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Annwyl Arolygwyr / Dear Inspectors,

**Re: CARMARTHENSHIRE REVISED LOCAL DEVELOPMENT PLAN (2018-2033)
EXAMINATION: INSPECTORS INITIAL QUESTIONS**

In response to your letter dated 31 July 2024, please find the Council's response to your initial questions providing further clarification and information as requested.

Procedural Matters

During the course of the hearing sessions, it may be necessary for the parties to discuss and agree changes to the structure and / or content of the RLDP. In order to ensure that this process is undertaken in an efficient and effective manner, we would be grateful if the Council could confirm that an officer, with delegated authority to make changes to the RLDP and agree the preparation of additional evidence, will be present at all hearing sessions.

Response

The Council can confirm that officers have delegated authority under the Council's scheme of delegation to agree changes that may be required and that an officer with that authority will be present at all hearing sessions. The relevant extract from the Scheme of Delegation is set out below. It is however noted that as required through the Scheme of Delegation that where any changes are substantive and relate to alterations to the Plan's strategy, reference will be required to internal reporting procedures. Whilst it is anticipated that such circumstances are unlikely, we will ensure provisions are in place to ensure any matters are expedited efficiently.

'To agree minor changes to the Carmarthenshire Unitary Development Plan or any subsequent plan which does not fundamentally alter the plan's basic strategy as agreed by County Council. Authority to the Head of Place and Sustainability to amend the policies where there are cartographical errors, typographical errors,

omission of objections or amendments to reflect emerging policies and guidelines from WG.'

Future Wales – The National Plan 2040

In light of the requirements of Policy 19 of Future Wales, which provides a framework for Strategic Policies in Regional Planning, it would be of assistance if the Council could confirm that the policies and allocations contained in the RLDP, specifically in relation to housing requirement and supply, would not have an adverse impact on the future formulation or delivery of the Strategic Development Plan for South West Wales.

Response

Yes, the Council considers that the content of the Revised LDP is in conformity with the content of Future Wales including Policy 19. It would specifically, in relation to housing requirement and supply have no adverse impact on the formulation and delivery of the forthcoming Strategic Development Plan (SDP). Reference is made to the response received from the Welsh Government (Representation Number 5541) in relation to the 2nd Deposit Revised LDP which states:

The following conformity statement is a 'caveated response'. Until the issues raised in Annex 2 of this letter regarding fundamental inconsistencies with the total housing provision are addressed, and their implications understood, it is not possible to give a firm view on matters of conformity at this time. The following statement 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. (See Annex 2 for detailed comments)

The Welsh Government is of the opinion that Carmarthenshire's Replacement Local Development Plan (2018-2033) is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).

Scale of growth: Future Wales Policies 1 and 28 identifies Swansea Bay and Llanelli as a National Growth Area, complimented with the identification of Regional Growth Areas at Carmarthen and the Teifi Valley (Policies 1 and 29). Collectively these places should provide the focus for sustainable growth, transport, services, and facilities. In addition, Policies 4 and 5 support appropriate rural housing (especially affordable housing) and economic growth in rural communities, to support the creation of age balanced communities and to help reverse de-population where this has been identified as an issue. The level of homes proposed in the Deposit LDP is 8,822 homes over the plan period, an uplift of 4,450 homes above the 2018 principal projection and 11% above the past five-year build rates. The Council considers that this scenario will provide a positive outlook both demographically and economically allowing flexibility to drive sustainable housing growth. The Council states that this level of growth will assist in the delivery of the Swansea City Deal, the

Councils regeneration objectives and ensure the delivery of affordable homes. This degree of aspiration aligns with the County's role within a national and regional growth area. This is supported by 71.21ha of employment land (Policy SP7) to help deliver a minimum of 4,140 new jobs (276 jobs per annum), which will help minimise rural de-population of working aged people and positively support the Welsh Language. Collectively, these approaches support the County as having a key role in the national growth area, aligning with Future Wales.

Distribution of growth: *The LDP has undertaken a settlement role and function analysis. The Council's strategy is a hybrid approach that reflects the role and function of settlements, investment, and economic benefits of the City Deal, whilst providing opportunities for sustainable growth in urban and rural areas. Policy SP3: Sustainable Distribution, identifies 6 clusters. Within each cluster is a functionally linked area with 4 settlement tiers comprising Tier 1: Principal Centres, Tier 2: Service Centres, Tier 3: Sustainable Villages and Tier 4: Rural Villages. Over 80% of housing growth and 90% of employment land is located in the more sustainable Tier 1 and Tier 2 settlements. This approach is in line with Future Wales and strikes an appropriate balance of locating growth to more sustainable settlements, while also supporting rural communities.*

Policy 19 – Regional Planning and 28 National Growth Area: *Future Wales brings a new perspective that all LDPs must embrace, that of how each LDP sits within the region as a whole and the relationship to other LDPs, in essence a strategic approach to planning in advance of the formal commencement of SDPs.*

We note that the region has produced the 'Swansea Bay and Llanelli National Growth Area Definition Project Research Report'. Regional collaboration is supported, and the preparation of joint evidence is welcomed. However, further clarification is required to understand how the level of growth proposed is complementary to neighbouring authorities and ensure key investment decisions support the National Growth Area and the wider region. This point is particularly pertinent given the current lack of transparency on the level of housing provision.

Other comments for consideration

The Plan itself is largely silent about Future Wales and its influence on the scale and location of growth, and the policies within the Plan. This should be made clearer and more explicit. See also specific comments in Annex 2 regarding renewable energy, the consideration of BMV land and Future Wales.

Reference is made to the Position Statement in respect of Regional Collaboration (CSD67). This statement has been prepared in collaboration with the other local planning authorities across the region. Reflecting its draft status, this statement will be subject to further development as the respective LDPs within each authority area progress through the replacement process. It seeks to provide an overview of cross boundary, strategic planning matters for the south-west Wales region and demonstrates how Local Development Plans (LDP) 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 for South West Wales (CJC).

Specific reference is made to paragraphs 5.16 - 5.19 and Table 1: Housing Requirement of the position statement in respect of housing. It should be noted that this statement was not a mechanism to consider the regional level of housing growth, or to consider matters of apportionment across the region. However, it provides a clear indication that should the respective housing requirement figures in any published Deposit Plans together with emerging housing need figures from the authorities developing replacement plans be adopted (see Table 1 of the position statement) then they would broadly accord with the regional figure of 25,600 in Future Wales. It also supports that the Swansea Bay and Llanelli National Growth Area will be the focus for growth and investment in the South West region in conformity with Future Wales Policy 28.

It should be noted that it would be a matter for the preparation of the SDP to consider the need for regional evidence on population and housing as part of its preparation.

Reference is also made to the Submission Documents CSD34 and CSD40 in relation to Housing and Economic Growth Report and Swansea Bay and Llanelli National Growth Area (NGA) Definition Project Research Report.

Planning Policy Wales, Edition 12 (February 2024)

A revised version of Planning Policy Wales (PPW) was issued by the Welsh Government in February 2024. The revisions to PPW are contained primarily in chapter 6 and relate to net benefit for biodiversity and ecosystems resilience (incorporating changes to strengthen policy on sites of special scientific interest, trees and woodlands and green infrastructure).

To assist the examination, we would be grateful if you could review the contents of the revised chapter 6 and provide a response which explains how the requirements of PPW have been addressed or any changes that maybe required to the submitted RLDP.

Response

In summary, the principal changes made to Chapter 6 represent significant enhancements to ensure that development planning prioritises biodiversity and ecosystem resilience. A critical update is the requirement for all developments to secure a net benefit for biodiversity, addressing the documented decline in habitats and species. The policy mandates a step-wise approach where developers must first avoid harm to biodiversity, then minimize and mitigate any unavoidable impacts, and, as a last resort, provide compensation. This approach is designed to ensure that developments contribute positively to the environment rather than depleting it. Additionally, the revisions emphasise the integration of green infrastructure into planning processes. The protection of designated sites, such as Sites of Special Scientific Interest (SSSIs) and peatlands, is also strengthened, with development in these areas being heavily restricted unless it directly contributes to their conservation or resilience. In accordance with other national policy, this approach reflects a stronger commitment to sustainability and the protection of natural resources in Wales. That said, the Revised LDP continues to align well with PPW given the emphasis placed upon sustainable placemaking, biodiversity enhancement, ecosystem resilience, and the protection and management of natural resources. While consideration has been given throughout the revised LDP to supporting the making of distinctive and natural places, specifically in response to biodiversity and green and blue infrastructure (GBI) through policies SP14, NE1, NE2, NE3, PSD3, and PSD4. These policies reflect key requirements such as protecting designated sites, maintaining and enhancing ecological connectivity, and ensuring net benefits for biodiversity. They also incorporate the mitigation hierarchy and recognise the importance of GBI within new development, which is consistent with the updated PPW's emphasis on integrating ecological and green infrastructure considerations. However, there are areas where the revised LDP policies could be refined or strengthened to better reflect the updated requirements of Chapter 6.

Below is an analysis of each policy's alignment with the updated Chapter 6 of PPW and suggestions for changes to the content of the Revised LDP (it should be noted that reference should also be made to the responses in relation to the individual hearing sessions – notably sessions 1 and 5):

SP14: Maintaining and Enhancing the Natural Environment

Policy SP14 is aligned with the updated PPW Chapter 6 by emphasising the protection and enhancement of the natural environment, including the need to avoid significant adverse effects on designated sites, contribute to ecosystem resilience, and provide net benefits for biodiversity. It aligns with the requirement for integrating the principles of the Sustainable Management of Natural Resources (SMNR) and considering NRW's South West Wales Area Statement. However, SP14 could strengthen the policy's alignment with PPW by adding the following specific references:

- Explicit mention of 'Ecosystem Resilience' and 'Resilient Ecological Networks'. Noting that Chapter 6 states that planning authorities must also take account of and promote the resilience of ecosystems in accordance with the DECCA Framework.
- The use of Green and Blue Infrastructure Statements is already identified within PSD3. However, this policy or its supporting text could also be amended to incorporate the need for applicants to produce a Green and Blue Infrastructure Statements.

NE1: Regional and Local Designations

Policy NE1 aligns with Chapter 6's focus on protecting non-statutory designations (e.g., Local Nature Reserves, SINC, RIGS). It follows the mitigation hierarchy and requires compensatory measures or demonstration of overriding reasons for development where adverse impacts are unavoidable. The policy is consistent with the requirement for no significant loss of habitats or species and providing net benefits for biodiversity. However, the following amendments may be considered:

- As Chapter 6 places significant emphasis on the connectivity between habitats and features (particularly in resilient ecological networks), NE1 should highlight the importance of maintaining ecological connectivity more explicitly. While this issue is already covered in NE3, loss of specific connectivity to Regional and Local Designations could be mentioned.
- while not representing a local or national designation, reference could be made to peatlands given PPW paragraph 6.4.34 states that "Where peat is identified within proposed developments considerable weight should be given to its protection because of its special importance in underpinning and supporting national natural resources such as soil carbon, biodiversity and flood management, and unless other significant material considerations indicate otherwise it will be necessary to refuse permission"
- reference to the 'mitigation hierarchy' should be updated to the 'step-wise approach' (as throughout the plan) to further ensure consistency.

NE2: Biodiversity

Policy NE2 is aligned with the updated Chapter 6's emphasis on the Section 6 Duty (Biodiversity and Resilience of Ecosystems Duty) of the Environment (Wales) Act 2016. It requires development to contribute to biodiversity net benefit and resilience which directly aligns with PPW. However, reference could be made to the need to consider information contained in State of Nature Report (SoNaRR), Area Statements, Local Nature Plans, Local Nature Recovery Action Plans, Local Biodiversity Action Plans and that held by Local Environmental Record Centres within the planning system (6.4.3). Additionally, the policy should be amended to ensure alignment with the step-wise approach.

NE3: Corridors, Networks, and Features of Distinctiveness

Policy NE3 aligns with Chapter 6's emphasis on maintaining and enhancing ecological corridors, networks, and features of distinctiveness. As previously mentioned, updating the mitigation hierarchy to the step-wise would continue to support the mitigation adverse effects whilst more proactively requiring enhancements to ecological connectivity, wherever feasible (and in line with NBB). Again, explicit reference to the DECCA Framework will need to be included within the supporting text of the policy.

PSD3: Green and Blue Infrastructure Network

Policy PSD3 aligns closely with Chapter 6's requirements on Green Infrastructure despite more explicitly highlighting the importance of blue assets. It emphasises retaining, enhancing, and connecting existing Green Infrastructure assets and achieving multi-functionality, which mirrors PPW.

However, a fundamental difference is the requirement for a Green and Blue Infrastructure Statements with the policy referencing them for major developments only, whereas Chapter 6 recommends all proposals should submit one. The policy will be amended to reflect this requirement (reference is made to the response below in relation to PSD3).

Additionally, given the emphasis on nature recovery, the prioritisation of quality and condition included within this policy may no longer be considered consistent with national policy and could be omitted.

PSD4: Green and Blue Infrastructure – Trees, Woodlands, and Hedgerows

Policy PSD4 aligns well with Chapter 6's updated emphasis on the protection and enhancement of trees, woodlands, and hedgerows as key components of Green and Blue Infrastructure. It aligns with the requirement to avoid impacts, provide appropriate compensation for loss, and deliver net benefits for biodiversity. However, paragraph 6.4.42 discusses the provision of compensatory planting (recommending a minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost). Reference is made to the content of the Council's statement for Hearing Session 1.

Second homes and short-term holiday lets

It is noted that PPW has also been amended to reflect changes to policy and legislation in respect of second homes and short-term holiday lets. Paragraph 4.2.10 is of relevance to the production of LDPs noting that measures can be introduced to restrict the occupancy of dwellings, however, this should be underpinned by 'robust local evidence'. Please see the Council's response to Question 10 in Hearing Session 2 which provides additional information on this issue. The Council considers it appropriate to give further consideration to this matter during the Examination in order to ensure that the LDP gives the matter full consideration.

Flood Maps for Planning

The latest updates to the Flood Maps for Planning (FMfP) were issued by Natural Resources Wales in May 2024. This update, together with earlier iterations, include a number of alterations to flood zones 2 and 3 across Wales and mapping improvements to the defended zones contained in Technical Advice Note 15 (TAN 15).

In light of the updated information, we would be grateful if the Council could review the policies and site allocations in the RLDP and provide response which identifies any policies or site allocations which conflict with the requirements of TAN 15 or the FMfP, explain how these matters have or will be addressed and if amendments will be required to the submitted RLDP.

The FMfP reflects the best available information in respect of flooding but has no official status until the new TAN15 is adopted. Nevertheless, the Revised LDP has regard to the FMfP and they have informed the site selection process.

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. The assessment identified sites which were affected by flood risk. Further to this assessment the sites have been reviewed again against the most recent FMfP and this data is set out in Appendix 1 of this response.

It is anticipated that a revised version of TAN15 will be published, and should this occur prior to the adoption of the Revised LDP then it may be considered appropriate to make amendments to the following policies to reflect its content. However, in its absence the current TAN15 (2004) remains extant and does not reflect the content of the Flood Maps for Planning or for their consideration.

CCH5: Flood Risk Management and Avoidance refers to the justification tests in national policy and the Development Advice Maps. It may be considered appropriate to include reference to Flood Zone 3 within the FMfP and an amended justification test should one be published in the revised TAN15.

Paragraph 11.522 provides an overview of the Development Advice Maps and the flood zones identified within them. This should be amended to also make reference to the FMfP and the flood zones identified within it.

Para 11.526 makes reference to the justification and assessment requirements contained within TAN15. This may need to be amended to ensure conformity with the new TAN15.

Contents of the Plan

Whilst we note that a significant amount of work has been undertaken to formulate the contents of the RLDP, there are nevertheless a number of areas of the Plan which need further clarification and / or revision. These relate specifically to:

- **The structure (layout and numbering) of policies in the Plan, which vary significantly throughout the document. To ensure the clarity and consistency, it is requested that the Council amend Policies HOM3, HOM7, HOM8, AHOM1, SP7, EME1, VE1, VE2, VE3, PSD3, PSD4, PSD5, RD3, NE1, NE2, NE3, NE6, NE7, BHE1, CCH1, CCH2, CCH3, SP17, MR1, MR3, SP19 and WM2 to reflect the predominant structure of policies which is exemplified by Policies SP1, PSD1 and PSD12.**

Response

The above comment is duly noted and the amendments to the policies as requested will be undertaken and included as part of the matters arising changes. This will ensure that any further amendments arising from the consideration of policies through the examination are contained within one proposed change.

- **Policies SP1, SP4, SP13, SP17, HOM2, EME4 and GTP1 which should be amended to make reference to Policy SP3, and**

Response

The above comment is duly noted and the amendments to the policies as requested will be undertaken and included as part of the matters arising changes. This will ensure that any further amendments arising from the consideration of policies through the examination are contained within one proposed change.

- **Policies SP10, SG2, MR1, INF3, NE4, CCH4, CCH5 and PSD8 should be amended to remove the reference to the ‘Council / Local Authority’, and**

Response

The above comment is duly noted and the amendments to the policies as requested will be undertaken and included as part of the matters arising changes. This will ensure that any further amendments arising from the consideration of policies through the examination are contained within one proposed change.

- **For completeness, it would be helpful if the Council could provide representation numbers for the comments made by Natural Resources Wales in their representations in respect of Policies SP3, PSD3, INF5 and NE3, and provide a response to the issues raised.**

Response

- Policy PSD3 - 5739;
- Policy INF5 - 5736; • Policy NE3 – 5750;
- Policy SP3 - no representation has been submitted by NRW.

A response to PSD3 is contained on page 732 of Appendix 12 of the Consultation Report: [Microsoft Word - Appendix 12 - Instructions \(gov.wales\)](#) .

The initial response as set out in the consultation report (see link above) is as follows:

'Comments noted.

It should be noted that given subsequent changes to Chapter 6 of PPW, a green and blue infrastructure statement will now be required on all planning applications (not just major developments).

Consideration will be required at the examination.'

In light of the publication of Planning Policy Wales Edition 12 and notably the changes in relation to Chapter 6 the following supplemental response is provided.

The Council recognises the changes in national planning policy requiring all applications to be accompanied by a Green and Blue Infrastructure Statement. Please see our response above proposing amendments to PSD3. Further amendments will be made to paragraphs 11.298 and 11.299 to reflect the requirements of national planning policy in relation to the preparation of Green and Blue Infrastructure Statements.

It is also proposed to amend criterion 4 to read as follows:

'Maximise opportunities to achieve multi-functionality by integrating GBI functions to deliver combined objectives which benefit Biodiversity, Climate Change and Sustainability, Health and Wellbeing, Sense of Place, and Economy; and where this will not compromise the purpose of the Green and Blue Infrastructure;'

In relation to the respondent's suggestion to include a new criterion 6, the wording as proposed reflects a supporting statement and not a policy requirement. It is however proposed to include the wording as part of the supporting text of the policy under the section 'Biodiversity'.

The potential impact of lighting on wildlife conservation is duly noted. Further amendments will be made to paragraphs 11.298 and 11.299 to reflect the requirements of national planning policy in relation to the preparation of Green and Blue Infrastructure provided for that purpose. Consequently, the following new policy criterion is proposed:

'6. Avoid illumination of Green and Blue Infrastructure provided for the purpose of wildlife conservation.'

The above proposed changes in wording to the policy and its supporting text will form part of the Matters Arising Changes.

It should be noted that SPG in relation to the Revised LDP is under preparation in relation to Green and Blue Infrastructure which will include guidance on the content

of Green and Blue Infrastructure Statements as well as other matters relating to the design and incorporation of Green and Blue Infrastructure in new developments.

INF5

Response to INF5 is contained on page 679 of Appendix 12 of the Consultation Report: [Microsoft Word - Appendix 12 - Instructions \(gov.wales\)](#).

The initial response as set out in the consultation report (see link above) is as follows:

'Regard should be had to the emerging nature of this impact pathway, the associated development in scientific understanding, and the subsequent advent of mitigative solutions and relevant guidance – factors which do not align well with the development plan process. As clarified within the HRA 2nd Addendum (Ref 61, Appendix A), the recommendations made in paragraph 4.2.11 were in the interest of specificity and are not considered to impact the soundness of the plan whether subsequently heeded (or not).'

This matter will be further considered during examination.'

The following supplemental response is provided.

In referencing the recommendation in paragraph 4.2.11 of the HRA Addendum Report (February 2023) it is proposed to amend INF5 to include the following wording at the end of the Policy.

'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'

The above proposed changes in wording to the policy will form part of the Matters Arising Changes.

NE3

Response to NE3 is contained on page 792 of Appendix 12 of the Consultation Report: [Microsoft Word - Appendix 12 - Instructions \(gov.wales\)](#).

Response:

'Comments noted.'

Policy NE2 provides the clarity requested relating to exceptional circumstances.'

****Correction:** the policy reference in the consultation report should refer to Policy NE3 not NE2.

The following supplemental response is provided.

In light of the changes to National Policy in relation to Chapter 6 of PPW it is proposed that the policy be amended to reflect the stepwise approach as contained in guidance. In this respect criterion 1 of the policy contains reference to the 'mitigation hierarchy'. This should be replaced with 'stepwise approach' with consequential changes to the supporting text. Further clarity on the stepwise approach will be contained in a forthcoming SPG.

It is also proposed to amend criterion 2 to include 'which will need to be completed prior to commencement' at the end of the criteria.

It is noted that PPW contains a number of references to wholly exceptional or exceptional circumstances within Chapter 6 and as such it is considered that the approach remains compatible with its provisions. To assist in the interpretation of the meaning of the policy it is proposed to insert the following wording into the supporting text:

'In exceptional circumstances, the need for a development might outweigh the need to protect a particular site. In such instances, the impact should be considered in light of the stepwise approach to mitigate, compensate and enhance for the loss of such features to ensure that alternative wildlife habitat provision or habitat creation is provided in order to ensure that there is no net loss in overall biodiversity of the area or feature.'

The above amendments ensure the policy remains reflective of national policy as set out in PPW and will be set out as part of the matters arising changes.

An initial list of proposed changes to the RLDP is also attached at Appendix 2, as requested.

Yours faithfully

Rhodri Griffiths

Head of Place and Sustainability / Pennaeth Lle a Chynaliadwyedd

Appendix 1 – Allocations against Flood Maps for Planning (FMfP)

The reference made to the Flood Maps for Planning (FMfP) and TAN15 is duly noted. However, whilst the FMfP represent the best available information on flood risk and are used by Natural Resources Wales (NRW) to inform their planning advice their initial publication was to be accompanied by a revised TAN15. The draft revised TAN which contained provisions in relation to their use in decision making would have provided a framework through which the FMfP and its flood zones including surface water would have been implemented at a plan making and policy level. This would have included the revised justification tests. However, the revised TAN whilst published in draft form wasn't formally adopted as national policy and as such has limited weight. In the absence of the revised TAN15 the current TAN15 (2004) remains extant as national planning policy.

Consequently, and as reflected by NRW, the FMfP which shows how climate change will affect flood risk, has no official status until the Welsh Government implements the revised TAN15.

It is noted at the time of writing there is no firm indication on the publication of a further revised TAN15 or clear indication of its content. In responding to the issues associated with flood risk and as part of the preparation of the Revised TAN15, Local Planning Authorities were asked to review their Strategic Flood Consequences Assessments in line with the then draft revised TAN15 as published in September 2021 and the Flood Map for Planning. This requirement was set out in the Welsh Government letter dated the 15th December 2021 and followed a letter by the Minister dated the 23 November 2021. As required an SFCA was undertaken within the South West Wales region (CSD227) and supplemented by an appraisal of sites at a local Carmarthenshire level (CSD226).

The WG letter also sets out that: 'When plans are reviewed, the flood risk considerations that feed into the settlement strategy and site allocations must be in accordance with the new TAN 15 and the Flood Map for Planning. The SFCA will be the principal source of evidence to inform those elements of the plan and locally specific flood risk policies.' In this respect the SFCA was undertaken and clearly informed the preparation of the 2nd Deposit version of the Revised LDP. It is however noted that the new TAN15 as referenced and its guidance in relation to the consideration of the content of FMfP did not come into force.

In preparing the Revised LDP the Council has had clear reference to the FMfP as well as the current TAN15 and the Development Advice Maps – reference is made to the evidence base in this regard (submission documents, CSD228, CSD227, CSD226). It is however noted that an update of the FMfP has been produced in May 2024 after the preparation of the 2nd Deposit Revised LDP – the implications of which are considered in the table set out below. It should however be noted that the response whilst informed by the content of the FMfP as providing the most up to date information also reflects the absence of an updated national planning policy to support its interpretation from a decision-making perspective.

Site Name	Flooding Constraint	Commentary
Housing Sites		
Cluster 1		
PrC1/h3 – 113 Priory Street, Carmarthen	A small portion of the site (less than 1%) falls within the NRW Surface Water and Small Water Courses (2 & 3)	Site is developed.
SuV15/h1 – Llanarthne School	Approx 20% of the site falls within the NRW Surface Water and Small Water Courses (2 & 3)	Site is developed.
SuV16/h1 - Llwynddewi Road	A small portion of the site (approx. 5%) falls within the NRW Surface Water and Small Water Courses (2 & 3)	Site is developed.

PrC1/MU1 – West Carmarthen	A small portion of the site (approx. 10%) falls within the NRW Surface Water and Small Water Courses (2 & 3)	<p>The site is a very large mixed-use area, and the elements of the site subject to fluvial flooding constraints have been excluded from being developed in the masterplan as set out in the adopted Planning & Development Brief. The site has a history of housing delivery and several valid planning permissions.</p> <p>The extents of floodplain 2 and 3 for rivers and the sea are well constrained to the river corridor. It should therefore be possible to wholly locate built development in flood zone 1.</p> <p>A site- specific FCA at application stage may be required for parts of site that lie within flood risk areas, demonstrating how the flood risk will be mitigated through site design. Additional information and review of the existing flood modelling may be required to include ditches and tributaries of the Tawelan Brook which could influence the extent and depths of flooding within the site.</p> <p>The surface water and small watercourses implications will be considered at a planning application level with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach</p>
		<p>with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse, where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
SuV5/h1 – Land at Maesglasnant	A small portion of the site lies within the NRW Flood Zone 3 Rivers	The part of the site that is affected by the identified Flood Zone has been developed.

PrC1/h18 – Castell Howell	A small portion of the site (less than 1%) falls within the NRW Surface Water and Small Water Courses (2 & 3)	The site has outline planning permission.
SuV3/h1 - Land to the rear of Maesgriffith	Part of the site (approx. 20%) lies within the NRW Flood Zone 3 Rivers	The site has full planning permission.
PrC1/h8 - Llansteffan Road	A small portion of the site (approx. 10%) falls within the NRW Surface Water and Small Water Courses (zone 2)	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse, where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>

<p>PrC1/h12 Castell Pigyn Road</p>	<p>–A large portion of the site (approx. 93%) lies within the NRW Flood Zone 2 Rivers & a very small portion (approx. 1%) falls within the NRW Surface Water and Small Water Courses (2 & 3)</p>	<p>When allocating the site in the 2nd Deposit LDP, the site was outside the C2 flood zone in the DAMs. However, the site is now identified as being in Flood Zone 2 for rivers according to NRW's FMfP. This represents an updated position from the previous FMfP and the SFCA and affects a significant element of the site.</p> <p>In relation to the risk of flooding identified in the FMfP as a material consideration, it is duly noted. However, its interpretation in policy terms is not informed by National planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>Whilst the flood impact as set out on the FMfP is noted it is not proposed to omit the site, pending further policy guidance through a further revised TAN15. Any planning application to deliver the site will be required to have regard to the FMfP and should be accompanied by appropriate evidence including a detailed FCA.</p> <p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse, where appropriate.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
<p>SuV12/h1- Adj. Gwyn Villa</p>	<p>A small portion of the site (approx. 1%) falls within the NRW Surface Water and Small Water Courses (zone 2)</p>	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is</p>

		<p>not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
SuV17/h1 - Rear of former joinery, Station Road	A small portion of the site (approx. 10%) falls within the NRW Surface Water and Small Water Courses (zone 2 & 3)	<p>The surface water and small watercourses implications will be considered at a planning application level with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
SuV14/h1 – Cefn Farm	A small portion of the site (approx. 15%) falls within the NRW Surface Water and Small Water Courses (zone 2 & 3)	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>

Cluster 2

PrC2/h3 – Parc y Strade	Approximately 60% falls within NRW flood zone Rivers (zone 2 & 3) – Corner of the site falls within NRW Flood Seas (zone2) – Approximately 30% NRW Surface Water and Small Water Courses (zone 2 & 3)	Site is developed
PrC2/h6 - 107 Station Road	100% falls within NRW flood zone rivers (zone 2) – 100% of the site falls within NRW flood zone seas (zone 3) – Site lies adjacent to NRW Surface Water and Small Water Courses (zone 2&3). 100% of the site falls within NRW TAN15 Defended Zone.	Site is developed
PrC2/h7 - 13-15 Station Road	100% falls within NRW flood zone rivers (zone 3) – Approximately 1% of the site falls within NRW flood zone seas (zone 2&3) – Approximately 20% of the site falls within NRW Surface Water and Small Water Courses (zone 2&3). 1% of the site falls within NRW TAN15 Defended Zone.	Site is developed
PrC2/h9 - 3-5 Goring Road	Approximately 15% falls within the NRW Surface Water and Small Water Courses (zone 2)	Site is developed
PrC2/h12 - Llys yr Hen Felin, Town Centre	Approximately 40% falls within the NRW Flood Zone Rivers (zone 2&3)	Site is developed
PrC2/h19 - Genwen, Bryn	Approximately 5% falls within the NRW Surface Water and Small Water Courses (zone 2&3)	Site is developed

SeC3/h2 - Llys Felin	Approximately 25% falls within the NRW Flood Zone Seas (zone 2&3)	Site is developed
SeC4/h3 - Glanmor Terrace	Approximately 3% falls within the NRW Flood Zone Rivers (zone 2) – Approximately	Site is developed

	60% falls within NRW Flood Zone Seas (zone 2)	
Sec5/h1 - Garreglwyd	Approximately 25% falls within the NRW Flood Zone Seas (zone 2&3)	Site is developed
SeC8/h1 - Ffos Las	Approximately 20% of the site falls within NRW Surface Water and Small Water Courses (zone 2&3)	Site is developed
SuV22/h1 - Gwenllian Gardens	Approximately 20% falls within NRW Surface Water and Small Water Courses (zone 2)	Site is developed
PrC2/h2 - Former Laboratory Pen y Fai Lane	Approximately 10% of the site falls within NRW Surface Water and Small Water Courses (zone 2)	Site is under construction
SeC8/h3 - Golwg Gwendraeth	Approximately 3% of the site falls within NRW Surface Water and Small Water Courses (zone 2&3)	Site is under construction
SuV23/h1 - Clos y Parc	Adjacent to NRW Surface Water and Small Water Courses Flood zone 2	Site is under construction
PrC2/h4 - North Dock (inc former Pontrilas)	Approximately 40% falls within the NRW Flood Zone seas (zone 2&3) – Approximately 10% falls within NRW Surface Water and Small Water Courses (zone 2)	Site has planning permission

PrC2/h15 - Maesarddafen Road / Erw Las, Llwynhendy	Approximately 25% falls within NRW Surface Water and Small Water Courses (zone 2&3)	Site has planning permission
PrC2/h16 - Ynys Las, Llwynhendy	Approximately 25% falls within NRW Surface Water and Small Water Courses (zone 2&3)	Site has planning permission
PrC2/h22 - Cwm y Nant, Dafen	Approximately 15% falls within NRW Surface Water and Small Water Courses (zone 2&3)	Site has planning permission
PrC2/h24 - Clos Ffordd Fach	Approximately 15% falls within NRW Surface Water and Small Water Courses (zone 2&3)	Site has planning permission
PrC2/h25 - Land off Clos-y-Berllan	Approximately 10% falls within NRW Surface Water and Small Water Courses (zone 2&3)	Site has planning permission
PrC2/h27 - 42 Stepney Street	100% falls within the NRW Flood Zone Rivers (zone 3) – Adjacent to NRW Surface Water and Small Water Courses Flood zone 2	Site has planning permission
PrC2/MU3 Former YMCA Building, Stepney Street	100% falls within the NRW Flood Zone Rivers (zone 3) – Approximately 20% falls within NRW Surface Water and Small Water Courses (zone 2&3)	Site has planning permission
SeC3/h3 - Llys Felin	Approximately 5% falls within NRW Surface Water and Small Water Courses (zone 2&3) – Approximately 30% of the site falls within NRW TAN15 Defended Zone	Site has planning permission
SeC3/h4 - Land at Former Dinas Yard	Approximately 5% falls within NRW Surface Water and Small Water Courses (zone 2&3)	Site has planning permission

SeC4/h2 - Burry Port Harbourside	Approximately 50% falls within the NRW Flood Zone rivers (zone 2) – Approximately 60% falls within NRW Flood Zone Seas (zone 2) - Approximately 15% falls within NRW Surface Water and Small Water Courses (zone 2&3)	Site has planning permission
SeC6/h3 - Bronallt Road	Approximately 13% falls within NRW Surface Water and Small Water Courses (zone 2)	Site has planning permission
SeC8/h2 - Cae Linda	Approximately 1% falls within NRW Surface Water and Small Water Courses (zone 2)	Site has planning permission
PrC2/h10 - Land adjacent The Dell, Furnace	Approximately 20% falls within NRW Surface Water and Small Water Courses (zone 2&3)	The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach

		<p>with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses, the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
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PrC2/h23 - Dafen East Gateway	Approximately 3% falls within NRW Surface Water and Small Water Courses (zone 2&3)	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
PrC2/SS1 - Pentre Awel	<p>Approximately 30% falls within the NRW Flood Zone rivers (zone 2&3) –</p> <p>Approximately 60% falls within NRW Flood Zone Seas (zone 2&3) - Approximately 15% falls within NRW Surface Water and Small Water Courses (zone 2&3) – Approximately 50% of the site falls within NRW TAN15 Defended Zone</p>	<p>Phase 1 of the site is in under construction.</p> <p>Currently, Phase 2 is awaiting the determination of a s73 application which considers an updated flood model. NRW, as the LPA's statutory advisor on flood risk has no concerns regarding flood risk to the proposed development or third parties.</p>
SeC7/h3 – Golwg Yr Afon	Approximately 15% falls within the NRW Flood Zone Seas (zone 3); Approximately	This Council owned site forms part of the Council's plans for housing delivery over the Plan period. Consultants were employed and a number of assessments have

	<p>10% falls within the NRW Surface Water and Small Water Courses (zone 2&3)</p>	<p>been carried out, however as the site is not identified in the current TAN15 Development Advice Maps as being at risk from flooding.</p> <p>In relation to the flooding identified in the FMfP as a material consideration, it is duly noted. However, its interpretation in policy terms is not informed by National planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>It should be noted that the area identified at risk of flooding in the FMfP is located along the eastern boundary of the site. It is not considered that the extent of flood risk and its impact on part of the site will prevent the allocation coming forward for the number residential units identified.</p> <p>Any planning application in relation of the site will be required to have regard to the FMfP and be supported by appropriate evidence including an FCA.</p> <p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
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SeC7/h4 - Opposite Parc Morlais	Approximately 1% falls within the NRW Flood Zone Rivers (zone 2); Approximately 20% falls within the NRW Surface Water and Small Water Courses (zone 2&3)	The presence of flood zone 2 as set out on the FMfP is noted. However, it is very minor in terms of the extent to which it impacts upon the site area and its deliverability. Consequently, it is considered the extent of impact can be accommodated through the design and layout of the site.
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		<p>Any planning application in relation of the site will be required to have regard to the FMfP and be supported by appropriate evidence including a detailed FCA.</p> <p>In relation to the flooding identified in the FMfP as a material consideration it is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
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SuV23/h2 - Adjacent Little Croft	Approximately 20% falls within NRW Surface Water and Small Water Courses (zone 2&3)	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
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PrC2/GT1 - Land at Penyfan, Trostre, Llanelli	<p>Approximately 1% falls within the NRW Flood Zone Rivers (zone 2). Approximately 75% falls within Flood 2 and 3 (Tidal). Those elements of the site fall within the TAN15 Defended Zones</p> <p>Approximately 5% falls within NRW Surface Water and Small Water Courses (zone 2&3)</p>	<p>The areas of the site that fall within NRW flood Zone 2 (rivers and Tidal and zone 3 (tidal) also fall within TAN15 Defended Zone. Any planning application in relation of the site will be required to have regard to the FMfP and be supported by appropriate evidence including a detailed FCA.</p> <p>The surface water and small watercourses implications will be considered at a planning application level with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
PrC2/GT2 - Penybryn (extension), Bynea, Llanelli	Approximately 10% falls within the NRW flood zones 2 & 3 (tidal). That element of the site falls within the TAN15 Defended Zones	The area of the site that falls within NRW flood Zone 2 & 3 (tidal) also falls within TAN15 Defended Zone. Any planning application in relation of the site will be required to have regard to the FMfP and be supported by appropriate evidence including a detailed FCA.
Cluster 3		
PrC3/h2 - Former Petrol Station, Wind Street	Approximately 23% falls within the NRW Flood Zone Rivers (zone 2); Approximately 5% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3)	Site is developed.
PrC3/h33 - Llys Dolgader	Approximately 70% falls within the NRW Flood Zone Rivers (zones 2 & 3);	Site is developed.

	Approximately 15% falls within the NRW	
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	Surface Water and Small Water Courses (zones 2 & 3)	
PrC3/h11 - Ffordd y Neuadd & Clos yr Eithin	Approximately 15% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3)	Site is developed.
PrC3/h24 - Land between 123 and 137 Waterloo Road	Approximately 15% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3)	Site is developed.
PrC3/h25 - Land off Gate Road	Approximately 5% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3)	Site is developed.
PrC3/h29 - Central Garage	Approximately 15% falls within the NRW Surface Water and Small Water Courses (zone 2)	Site is developed.
PrC3/h32 - Land south of Tycroes Road	Approximately 1% falls within the NRW Surface Water and Small Water Courses (zone 2)	Site is developed.
SuV28/h1 - Adjacent to Coedy Cadno	Approximately 20% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3)	Site is developed.
PrC3/h12 - Land adjoining A48 and Heol y Parc	Approximately 10% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3)	Site is under construction.

PrC3/h13 - Land at Heol Cae Pwnd	Approximately 5% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3)	Site is under construction.
PrC3/h19 - Land off Llys y Nant	Approximately 20% falls within the NRW Flood Zone Rivers (zones 2)	Site is under construction.
PrC3/h37 - Clos Felingoed	Approximately 20% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3)	Site is developed.

PrC3/h23 - Land at Waterloo Road	Approximately 10% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3)	Site is developed.
PrC3/h4 - Land at Tirychen Farm	Approximately 5% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3)	Site has outline planning permission
PrC3/h36 - Betws Colliery	Approximately 5% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3)	Site has full planning permission
PrC3/h9 - Land adjacent to Maesyrfhaf	Approximately 15% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3)	Site has full planning permission
PrC3/h22 - Adj to Pant y Blodau	Approximately 5% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3)	Site has full planning permission

<p>PrC3/h1 - Land at r/o No 16-20 & 24-30 Betws Road</p>	<p>Approximately 13% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3)</p>	<p>The SFCA concluded that there are no significant flood risk considerations for the site.</p> <p>The implications of surface water and small watercourses will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk, may include integration of design and layout solutions and submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
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PrC3/h6 - Land Adjoining Maes Ifan, Maesquarre Road	Approximately 2% falls within the NRW Surface Water and Small Water Courses (zone 2)	<p>The SFCA concluded that there are no significant flood risk considerations for the site.</p> <p>The implications of surface water and small watercourses will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. It may include integration of design and layout solutions and submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
PrC3/h8 - Land off Heol y Parc	Approximately 22% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3)	<p>The site is partially in flood zone 3 and 2 for surface water due to a watercourse which flows through the eastern part of the site. An FCA will be required for this site, demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and including the watercourse within the site layout. Modelling of the watercourse may be required to determine the extents and depths of flooding within the site.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>

PrC3/h14 - Nantydderwen	Approximately 28% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3)	The site is partially in flood zone 3 and 2 for surface water and small watercourses. Whilst this is likely partially related to a watercourse which flows through both of the parcels, a flow route unrelated to mapped watercourses is also represented in the
		<p>flood map. A FCA will be required for this site at planning application stage, demonstrating a sequential approach to development and that flooding elsewhere will not be increased as a result of development. Investigation of drainage in the area is recommended to determine the extent of flooding within the site.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
PrC3/h18 - Land adjoining Brynlluan	Approximately 35% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3)	<p>The northern half of the site is in flood zone 3 for surface water and small watercourses due to a watercourse which crosses the site.</p> <p>An FCA will be required for the site and site-specific modelling of the watercourse is recommended to determine the depths and extents of flood zones within the site boundary. A sequential approach to flood risk should be taken, demonstrating that the highest vulnerability uses are at the lowest risk of flooding.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>

PrC3/MU1 - Emlyn Brickworks	Approximately 8% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3)	<p>Part of the site has full planning permission.</p> <p>The SFCA concluded that there are no significant flood risk considerations for the site.</p> <p>The implications of surface water and small watercourses will be considered at a planning application level with the approach and information required dependent on</p>
		<p>the nature of the flood risk. It may include integration of design and layout solutions and submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>

PrC3/h27 - Land off Nant-y-Ci Road	Approximately 1% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3)	<p>The SFCA concluded that there are no significant flood risk considerations for the site.</p> <p>The implications surface water and small watercourses will be considered at a planning application level with the approach and information required dependent on the nature of the flood risk, and may include integration of design and layout solutions and submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
PrC3/h28 - Land at Factory site between No. 22 &	Approximately 6% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3)	The SFCA concluded that there are no significant flood risk considerations for the site.

<p>28 Bethesda Road</p>		<p>The implications surface water and small watercourses will be considered at a planning application level with the approach and information required dependent on the nature of the flood risk, and may include integration of design and layout solutions and submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
<p>SeC11/h1 - Land off Heol Llannon</p>	<p>Approximately 15% falls within the NRW Surface Water and Small Water Courses (zones 2 & 3)</p>	<p>The site is partially in flood zones 2 and 3 for surface water due to a watercourse which flows along the northern site boundary. Given the proximity of flood zones further consideration will be given to the flood risk and if needed an FCA will be required at planning application stage. However, given that the affected area is relatively small and along the site's northern and eastern boundaries, it is considered that there is sufficient flexibility to design a site layout which would minimise the flood risk to an acceptable level.</p> <p>In relation to the surface water flooding the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>

SuV27/h1 - Land adjacent to Tŷ Newydd	Approximately 5% falls within the NRW Surface Water and Small Water Courses (zone 2)	<p>The SFCA concluded that there are no significant flood risk considerations for the site.</p> <p>The implications surface water and small watercourses will be considered at a planning application level with the approach and information required dependent on the nature of the flood risk, and may include integration of design and layout</p>
		<p>solutions and submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
SuV30/h1 - Land off Pant y Brwyn	Approximately 5% falls within the NRW Surface Water and Small Water Courses (zone 2)	<p>The surface water and small watercourses implications will be considered at a planning application level with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
Cluster 4		

SeC12/h3 - Land to r/o Dolcoed	Approximately 20% falls within the NRW Surface Water and Small Water Courses (zone 2 & 3)	The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.
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		<p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
SuV37/h2 - Land south of Cae Coedmor	Approximately 10% falls within the NRW Surface Water and Small Water Courses (zone 2 & 3)	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>

SuV35/h1 - Land adj. Arwynfa	Approximately 20% falls within the NRW Surface Water and Small Water Courses (zone 2 & 3)	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
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Cluster 5		
SeC15/h1 - Land to north of Dan y Crug	Approximately 25% falls within the NRW Flood Zone Rivers (zone 2); Approximately 15% falls within the NRW Surface Water and Small Water Courses (zone 2&3)	Site has extant planning permission.

<p>SeC16/h1 - Llandeilo Northern Quarter</p>	<p>Approximately 10% falls within the NRW Surface Water and Small Water Courses (zone 2 & 3)</p>	<p>A current planning application is pending determination.</p> <p>The surface water and small watercourses implications will be considered at a planning application level with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
<p>SeC17/h1 - Land opp. Llangadog C.P School</p>	<p>Approximately 10% falls within the NRW Surface Water and Small Water Courses (zone 2)</p>	<p>The surface water and small watercourses implications will be considered at a planning application level with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p>
		<p>The above would be subject to review on publication of the revised TAN15.</p>

SuV51/h1 - Opp. Village Hall	Approximately 2% falls within the NRW Surface Water and Small Water Courses (zone 2)	<p>Part of the site is currently the subject of a planning application that is pending determination.</p> <p>The surface water and small watercourses implications will be considered as part of the current planning application with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
Cluster 6		
SeC18/h2 Former Butter Factory	Approximately 5% of the site falls within the NRW Surface Water and Small Water Courses (zone 2)	Site has been completed
SeC19/h4 - Parc y Dressig	Approximately 1% of the site falls within the NRW Surface Water and Small Water Courses (zone 2)	Site has been completed
SeC19/h3 - Gerddi Lingfield	Approximately 15% of the site falls within the NRW Surface Water and Small Water Courses (zone 2 & 3)	Site is under construction

SuV63/h1 - Land at Woodend	Approximately 20-25 % of the site falls within the NRW Flood Zone Seas (zone 2 & 3)	Site has planning permission and is under construction.
SeC19/h2 - Land at Whitland Creamery	Approximately 1% of the site falls within the NRW Flood Zone Rivers (zone 2)	<p>The site has planning permission on the northern element, and a technical start has been made.</p> <p>The presence of flood zone 2 as set out on the FMfP is noted for the remainder of the site. However, it is very minor in terms of the extent to which it impacts upon the site area and its deliverability.</p> <p>Any planning application in relation of the site will be required to have regard to the FMfP.</p> <p>In relation to the flooding identified in the FMfP as a material consideration it is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p>
SeC18/h3 - Land adjacent to Cefn Maes	Approximately 2% of the site falls within the NRW Surface Water and Small Water Courses (zone 2)	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>

SeC18/h4 - Land at Heol Llaindelyn	Approximately 10% of the site falls within the NRW Surface Water and Small Water Courses (zone 2 & 3)	The site is identified as being in Flood Zone 2 and 3 for Surface Water and Small Water Courses according to NRW's FMfP. In relation to the surface water flooding the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by National planning policy as a result of the delay in the adoption of the revised TAN15. .
SeC18/h6 - Land to the rear of Station Road	Approximately 3% of the site falls within the NRW Surface Water and Small Water Courses (zone 2 & 3)	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
SeC19/h1 - Land at Park View, Trevaughan	Approximately 10% of the site falls within the NRW Flood Zone Rivers (zone 2)	<p>A small portion of the site is now identified in NRW's Flood Zone 2 for Rivers. This represents an updated position from the previous FMfP and the SFCA It is not considered that the extent of flood risk and its impact on part of the site will prevent the allocation coming forward for the number residential units identified. However, any consideration of Zone 2 will have to be accommodated in the site layout. Any planning application to deliver the site will be required to have regard to the FMfP and should be accompanied by appropriate evidence.</p> <p>In relation to the flooding identified in the FMfP as a material consideration it is duly noted. However, its interpretation in policy terms is not informed by National planning policy as a result of the delay in the adoption of the revised TAN15.</p>

SuV56/h1 - Land to the r/o Talar Wen	Approximately 2% of the site falls within the NRW Surface Water and Small Water Courses (zone 2)	The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.
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		<p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
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SuV60/h1 - Land at College Bach	Approximately 5% of the site falls within the NRW Surface Water and Small Water Courses (zone 2)	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
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Regeneration & Mixed Use Sites

<p>PrC2/MU1 - Former Old Castle Works, Llanelli</p>	<p>Approximately 25% falls within the NRW Flood Zone Rivers (zone 2); Approximately 30% falls within the NRW Flood Zone Seas (zone 2); Approximately 15% falls within the NRW Surface Water and Small Water Courses (zone 2&3)</p>	<p>The site is previously developed land and part of a regeneration proposal consisting of less vulnerable uses. Less vulnerable development within areas of Flood Zone 3 will only be justified in exceptional circumstances. Highly Vulnerable Development is not allowed in areas of FZ3, and would need to be directed to the limited areas of FZ1 and FZ2. A detailed and robust FCA will be required to support any application demonstrating if, and how, the acceptability criteria can be met and demonstrating a sequential approach to flood risk across the site, with the highest vulnerability uses at the lowest risk of flooding.</p> <p>The surface water and small watercourses implications will be considered at a planning application level with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout</p>
		<p>solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>

<p>PrC2/MU2 - Trostre Gateway, Llanelli</p>	<p>Approximately 99% falls within the NRW Flood Zone Rivers (zone 2&3); Over 50% NRW Flood Zone Seas (zone 3&3); Over 50% falls within NRW TAN15 Defended Zones; Approximately 15% falls within the NRW Surface Water and Small Water Courses (zone 2&3)</p>	<p>The majority of the site has been developed for retail uses including a supermarket and drive through food and drink outlet. Only a small part of the site remains undeveloped with uses proposed being contiguous with retail uses in the main.</p> <p>The surface water and small watercourses implications will be considered at a planning application level with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
<p>SeC4/MU1 - Burry Port Waterfront</p>	<p>Approximately 60% falls within the NRW Flood Zone Rivers (zone 3); approximately 50% falls within NRW Flood Zone Seas (zone 2&3); Approximately 7% falls within</p>	<p>Whilst the site is previously developed land and part of a regeneration scheme made up of less vulnerable development the impact of Flood Zone 3 on part of the site is noted and would be subject to justification tests. No highly Vulnerable Development as defined in the extant TAN is proposed.</p>

	<p>the NRW Surface Water and Small Water Courses (zone 2)</p>	<p>A detailed and robust FCA will be required to support any application demonstrating if, and how, the acceptability criteria can be met and demonstrating a sequential approach to flood risk across the site, with the highest vulnerability uses at the lowest risk of flooding.</p> <p>The surface water and small watercourses implications will be considered at a planning application level with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
<p>SeC16/MU1 - Beechwood, Llandeilo</p>	<p>Small amount of Flood Zone 2 on the edge. Approximately 5% falls within the NRW Surface Water and Small Water Courses (zone 2&3)</p>	<p>The presence of flood zone 2 as set out on the FMfP is noted. However, it is minor in terms of the extent to which it impacts upon the site area and its deliverability. Consequently, it is considered the extent of impact can be accommodated through the design and layout of the site. It is noted that the proposed use is less vulnerable as set out within the extant TAN15.</p> <p>Any planning application in relation of the site will be required to have regard to the FMfP and be supported by a appropriate evidence including an FCA.</p> <p>In relation to the flooding identified in the FMfP as a material consideration it is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p>

		<p>The surface water and small watercourses implications will be considered at a planning application level with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
SeC20/MU1 - Laugharne Holiday Park	Approximately 2% falls within the NRW Surface Water and Small Water Courses (zone 2)	<p>The surface water and small watercourses implications will be considered at a planning application level with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>

PrC1/MU3 - Nantycaws Regeneration and Mixed Use Site	Approximately 20% falls within the NRW Surface Water and Small Water Courses (zone 2&3)	<p>The surface water and small watercourses implications will be considered at a planning application level with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is</p>
		<p>not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
PrC1/SS1 - Yr Egin, Carmarthen	Approximately 5% falls within the NRW Surface Water and Small Water Courses (zone 2&3)	Site has planning permission and phase 1 is complete.
Employment Sites		
PrC1/E1 Cillefwr Industrial Estate	A small portion of the site lies within the NRW Flood Zone 2&3 Rivers – see (i) & (ii) below	

PrC1/E1 (i) Land west of Cillefwr Road West	A very small portion of the site (approx. 1%) lies within the NRW Flood Zone 3 Rivers.	<p>The presence of flood zone 3 as set out on the FMfP is noted. However, it is minor in terms of the extent to which it impacts upon the site area and its deliverability. Consequently, it is considered the extent of impact can be accommodated through the design and layout of the site. It is noted that the proposed use is less vulnerable as set out within the extant TAN15.</p> <p>Any planning application in relation of the site will be required to have regard to the FMfP and be supported by a appropriate evidence including an FCA.</p> <p>In relation to the flooding identified in the FMfP as a material consideration it is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p>
PrC1/E1 (ii) Land north of Alltynap Road	A portion of the site (approx. 10%) lies within the NRW Flood Zone 2&3 Rivers.	<p>The presence of flood zone 2 and 3 as set out on the FMfP is noted. However, it is minor in terms of the extent to which it impacts upon the site area and its deliverability. Consequently, it is considered the extent of impact can be accommodated through the design and layout of the site. It is noted that the proposed use is less vulnerable as set out within the extant TAN15.</p> <p>Any planning application in relation of the site will be required to have regard to the FMfP and be supported by a appropriate evidence including an FCA.</p>
		<p>In relation to the flooding identified in the FMfP as a material consideration it is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p>
PrC1/MU1 West Carmarthen	A portion of the site (approx. 15%) lies within the NRW Flood Zone 2 Rivers and approx. 5% falls within the NRW Surface Water and Small Water Courses (flood zone 2 & 3).	See Comments above

PrC1/MU2 Pibwrlwyd	A portion of the site (approx. 5%) falls within the NRW Surface Water and Small Water Courses (flood zone 2 & 3).	<p>The surface water and small watercourses implications will be considered at a planning application level with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
PrC2/E2 Dafen	Portions of the site lie within the NRW Flood Zone 2&3 Rivers & portions fall within the NRW Surface Water and Small Water Courses (flood zone 2 & 3) – see individual portion info. below – Sites PrC2/E2 (i)-(iv)	
PrC2/E2 (i) Land east of Calsonic	A portion of the site (approx. 10%) falls within the NRW Surface Water and Small Water Courses (flood zone 2).	<p>The surface water and small watercourses implications will be considered at a planning application level with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is</p>
		<p>not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>

PrC2/E2 (ii) Land west of Gestamp Tallent	A portion of the site (approx.20%) falls within the NRW Surface Water and Small Water Courses (flood zone 2&3).	<p>The surface water and small watercourses implications will be considered at a planning application level with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
PrC2/E2 (iii) Land at Heol Aur	A portion of the site (approx. 25%) lies within the NRW Flood Zone 2 & 3 Rivers. A portion of the site (approx.25%) falls within the NRW Surface Water and Small Water Courses (flood zone 2&3).	<p>The presence of flood zone 2 and 3 as set out on the FMfP is noted. However, it is considered the extent of impact can be accommodated through the design and layout of the site. It is noted that the proposed use is less vulnerable as set out within the extant TAN15. It is recognised that the development of the vulnerable area would require assessment against the justification tests as identified in any future revised TAN15.</p> <p>Any planning application in relation of the site will be required to have regard to the FMfP and be supported by a appropriate evidence including an FCA.</p> <p>In relation to the flooding identified in the FMfP as a material consideration, it is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p>

		<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
PrC2/E2 (iv) Land west of Heol Gors	A portion of the site (approx.40%) falls within the NRW Surface Water and Small Water Courses (flood zone 2&3).	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>

PrC2/E2 (v) Land at Heol Croppin	A small portion of the site (approx. 1%) lies within the NRW Flood Zone 2 Rivers. A portion of the site (approx.3%) falls within the NRW Surface Water and Small Water Courses (flood zone 2&3).	The presence of flood zone 2 as set out on the FMfP is noted. However, it is minor in terms of the extent to which it impacts upon the site area and its deliverability. Consequently, it is considered the extent of impact can be accommodated through the design and layout of the site. It is noted that the proposed use is less vulnerable as set out within the extant TAN15.
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		<p>Any planning application in relation of the site will be required to have regard to the FMfP and be supported by a appropriate evidence including an FCA.</p> <p>In relation to the flooding identified in the FMfP as a material consideration it is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
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PrC2/E2 (vi) Land west of the Beacon	A portion of the site (approx.5%) falls within the NRW Surface Water and Small Water Courses (flood zone 2&3).	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
PrC2/E2 (vii) Land east of Air ambulance Base	A portion of the site (approx.20%) falls within the NRW Surface Water and Small Water Courses (flood zone 2&3).	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach</p>
		<p>with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>

PrC2/E2 (viii) Land at Llanelli Gate, off Heol Aur	A portion of the site (approx.10%) falls within the NRW Surface Water and Small Water Courses (flood zone 2&3).	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
PrC2/E2 (ix) Land west of Llys Aur	A portion of the site (approx.15%) falls within the NRW Surface Water and Small Water Courses (flood zone 2&3).	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is</p>
		<p>not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>

PrC3/E1 Cross Hands East	A portion of the site (approx.25%) falls within the NRW Surface Water and Small Water Courses (flood zone 2&3).	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
PrC3/E2 Cross Hands West Food Park	Portions of the fall within the NRW Surface Water and Small Water Courses (flood zone 2 & 3) – see individual portion info. below – sites PrC3/E2 (i) & (iii).	
PrC3/E2(i) Land west of Castell Howell	A portion of the site (approx.5%) falls within the NRW Surface Water and Small Water Courses (flood zone 2&3).	Site has planning permission and part is built.
PrC3/E2(iii) Land north of Dunbia	A portion of the site (approx.3%) falls within the NRW Surface Water and Small Water Courses (flood zone 2&3).	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is</p>

		<p>not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
PrC3/E3 Cross Hands Business Park	Portions of the site fall within the NRW Surface Water and Small Water Courses (flood zone 2 & 3) – see individual portion info. below: Sites PrC3/E3 (i)-(iii)	
PrC3/E3 (i) Heol Stanllyd (West)	A portion of the site (approx. 20%) falls within the NRW Surface Water and Small Water Courses (flood zone 2&3).	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>

PrC3/E3 (ii) Heol Stanllyd (South)	A portion of the site (approx.7%) falls within the NRW Surface Water and Small Water Courses (flood zone 2&3).	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p>
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		The above would be subject to review on publication of the revised TAN15.
PrC3/E3 (iii) Heol Stanllyd (East)	Site lies adjacent to an area identified as NRW Surface Water and Small Water Courses (flood zone 2 & 3).	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>

PrC3/E6 Capel Hendre Industrial Estate	A portion of the site (approx.10%) falls within the NRW Surface Water and Small Water Courses (flood zone 2&3).	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
PrC3/E7 Parc Hendre, Capel Hendre	Portions of the site lie within the NRW Surface Water and Small Water Courses (flood zone 2 & 3) – see individual portion info. below – sites PrC3/E7 (i)-(iv)	
PrC3/E7(i) Parc Hendre (West), Capel Hendre	A portion of the site (approx.2%) falls within the NRW Surface Water and Small Water Courses (flood zone 2&3).	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>

PrC3/E7(ii) Parc Hendre (North), Capel Hendre	A portion of the site (approx. 10%) falls within the NRW Surface Water and Small Water Courses (flood zone 2&3).	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
PrC3/E7(iii) Parc Hendre (East), Capel Hendre	A portion of the site (approx. 1%) falls within the NRW Surface Water and Small Water Courses (flood zone 2&3).	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>

PrC3/E7(iv) Parc Hendre (South), Capel Hendre	A portion of the site (approx.5%) falls within the NRW Surface Water and Small Water Courses (flood zone 2&3).	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
PrC3/E8 Cilyrychen Industrial Estate	A portion of the site (approx.2%) falls within the NRW Surface Water and Small Water Courses (flood zone 2&3).	<p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p>
		The above would be subject to review on publication of the revised TAN15.

SeC4/E1 Dyfatty, Burry Port	A small portion of the site (approx.1%) falls within the NRW Surface Water and Small Water Courses (flood zone 2). A small portion of the site (approx. 2%) lies within the NRW flood zone seas (flood zone 2&3)	Site has planning permission.
SeC16/MU1 Beechwood, Rhosmaen, Llandeilo	A small portion of the site lies within the NRW Flood Zone 2 Rivers (approx. 1%). A portion of the site (approx.5%) falls within the NRW Surface Water and Small Water Courses (flood zone 2&3).	<p>The presence of flood zone 2 as set out on the FMfP is noted. However, it is minor in terms of the extent to which it impacts upon the site area and its deliverability. Consequently, it is considered the extent of impact can be accommodated through the design and layout of the site. It is noted that the proposed use is less vulnerable as set out within the extant TAN15.</p> <p>Any planning application in relation of the site will be required to have regard to the FMfP and be supported by a appropriate evidence including an FCA.</p> <p>In relation to the flooding identified in the FMfP as a material consideration it is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. And may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
SeC19/E2 Land South of Former Creamery, Whitland	A portion of the site (approx.7%) falls within the NRW Surface Water and Small Water Courses (flood zone 2&3).	The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. This may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach

		<p>with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.</p> <p>In relation to the surface water and flooding from small watercourses the FMfP as a material consideration is duly noted. However, its interpretation in policy terms is not informed by national planning policy as a result of the delay in the adoption of the revised TAN15.</p> <p>The above would be subject to review on publication of the revised TAN15.</p>
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Appendix 2 - List of Proposed Changes

The following list of proposed changes include those identified as part of the Habitat Regulations Report (including Addendum) as well as those proposed in this response to the initial questions and those which part of the forthcoming Hearing Session Statements.

Plan Element	Change
Policies HOM3, HOM7, HOM8, AHOM1, SP7, EME1, VE1, VE2, VE3, PSD3, PSD4, PSD5, RD3, NE1, NE2, NE3, NE6, NE7, CCH1, CCH2, CCH3, SP17, MR1, MR3, SP19 and WM2	Amend the policies' structure.
Policies SP1, SP4, SP13, SP17, HOM2, EME4 and GTP1	Include reference to Policy SP3.
Policies SP10, SG2, MR1, INF3, NE4, CCH4, CCH5 and PSD8	Remove reference to 'Council / Local Authority'
Policies SP14, NE1, NE2, NE3, PSD3 (including paras. 11.298, 11.299, 11.300)	Amendments to strengthen the Policy's alignment with PPW. Please refer to the Council's response to the Inspector's Initial Questions and the Council's response to Q.1 and Q.2 Hearing Session 5.
Introductory Text and the Glossary	Add the Plan period end date in the Plan.
Strategic Policy SP1	Change the year of the Corporate Strategy from <i>2018-2033</i> to <i>2018-2023</i>
Policy SG2 Reserve Sites	The Council proposes removal of this Policy in response to representations received during the consultation on the Second Deposit revised LDP.
Strategic Policy SP4	Whilst the make-up of the housing supply was set out in background topic papers to make the Written Statement more streamlined, on reflection, the reasoned justification for Policy SP4 should include the make-up of the housing supply for transparency reasons.

	Proposed change to the housing supply figure in line with the Council's response to Question 2 – Hearing Session 2.
Strategic Policy SP5	The provision of 1900 affordable homes will be amended to consider an up-to-date position following 2 further years of housing data on planning permissions and completions.
Strategic Policy SP5	<p>Insert the word 'target' into the policy and to read as follows: <i>The Plan will maximise the delivery of affordable homes up to 2033 through the provision of a target of 1,900 affordable homes. This will support the development and enhancement of sustainable, balanced communities.</i></p> <p>This proposed change is reflected within the Council's response to Question 3, Hearing Session 3</p>
Strategic Policy SP7	The strategic site of Pentre Awel is also mentioned in this policy due to its strategic nature and associated employment offer. However, the site only has a small proportion of B uses associated with it and does not form part of the 71.21ha of employment allocation. This can be made clearer in the policy wording as an amendment.
Policy EME1	The Council considers it may be appropriate in the interests of clarity to omit the word 'existing' from the 1 st sentence of para. 11.153 in the supporting text of this policy. The policy relates to new allocations as well as existing sites.
Strategic Policy SP8 Para 11.173	Wording amended to reflect the 2021 Census data as follows: <i>Carmarthenshire in its entirety is considered to be an area of linguistic sensitivity. The 2021 Census indicates that 17.8% of the Welsh population are able to 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.</i>

Policy INF5	Rural Allocations outside Public Sewerage System Catchments could be further mitigated by directly referencing in the policy wording that ' <i>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</i> '. 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)."
Policies PSD1 and PSD3	Amend Policy wording. Please see the Council's response to Questions 16a – Hearing Session 1.
Policy PSD5	Policy wording to be changed from natural materials management plan to natural material management plan to reflect the wording in PPW12. Also, in para.11.311 of the supporting text to Policy PSD5, change reference from natural resources management plan to natural material management plan.
Policy PSD6 / Community Facilities	New policy proposed to safeguard community facilities. Please see the Council's response to Q.11 Hearing Session 2.
Policy NE4	Amend wording for clarity. Please see the Council's response to Q.3 Hearing Session 5.
Policy NE7 - Para 11.438	Delete reference to www.southwalescoast.org to www.southwalescoastalgroup.cymru
Policy BHE2	Whilst it is considered that BHE2 as set out within the 2nd Deposit LDP is satisfactory as a mechanism in managing the impact of development on the landscape, the preparation of the Landscape Character Assessment (LCA) along with its methodology and outputs has necessitated a review of the policy. In this respect a revision to the policy and its supporting text is proposed. This will ensure it better reflects the emerging assessment and landscape management and decision-making that's reflects the content of the LCA. The amended policy BHE2 is set out in Appendix A of the statement to hearing session 5.
Policy CCH1	<ul style="list-style-type: none"> • Remove reference to pre-assessed areas for wind energy within the Policy. Please see the Council's response to Q.4 Hearing Session 6. • Identify the three LSAs for solar and the contribution from each area within the Policy • Amend reasoned justification to explain that large scale energy developments (of 10MW+) are determined by Policy 18 in Future Wales: the National Plan 2040 and that these developments are acceptable within or outside the boundaries of the Local Search Areas.

Policy CCH4	Proposed changes to policy wording Change <i>Phosphates</i> to <i>Nutrients</i> . Additionally, in the interest of specificity, “ <i>development creating wastewater discharges</i> ” 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.
Policy MR2	In the interests of clarity, reference to be added to Policy MR2 setting out where the list of mineral sites and their associated buffer zones can be viewed in the Plan, namely Appendix 4, and on the Proposals Maps.
Glossary	The Plan Period description needs amending.
Appendix 3	Amend the target dates for the adoption of SPGs to reflect the plans date of adoption.
Appendix 7	Amend all elements of the Housing Trajectory in line with the most recent update which is provided in the Council's response to the Hearing Session 2 – elements include the timing and phasing of allocations for allocated and committed sites, housing trajectory table, housing trajectory graph and the spatial distribution of housing table.