

CARMARTHENSHIRE
REVISED LOCAL DEVELOPMENT PLAN (2018-2033)
EXAMINATION

**Hearing Session 6 – Strong Connections – Climate Change, Renewable Energy,
Transportation, minerals and Waste**

Wednesday, 23 October 2024 between 10:00 and 17:00

Action Point	Council Response / Proposed MAC	Inspectors' Comments
AP6/1	<p>Amend Strategic Policy SP16 as follows:</p> <p>Strategic Policy – SP16: Climate Change</p> <p>Development proposals will be supported if they respond, adapt, increase resilience, and minimise the causes and impacts of climate change. Proposals must:</p> <ul style="list-style-type: none">a) Contribute to a reduction in carbon emissions by reflecting sustainable transport principles and minimising the need to travel, particularly by private motor car;b) Avoid, or where appropriate, minimise the risk of flooding including the incorporation of measures (such as SuDS and flood resilient design);c) Promote the energy hierarchy by reducing energy demand, promoting energy efficiency, and increasing the supply of renewable energy;	Change agreed.

	<p>d) Incorporate appropriate climate responsive design solutions including orientation, layout, density, and low carbon solutions (including design and construction methods) and utilise sustainable construction methods where feasible; and for</p> <p>e) Contribute towards the protection and enhancement of GBI assets and resilient ecological networks as carbon sinks.</p> <p>Development proposals which are located within areas at risk from flooding will not be permitted unless they accord with the provisions of Planning Policy Wales and TAN 15.</p>	
AP6/2	<p>The following policy changes have been sent to the Welsh Government and we are awaiting their response.</p> <p>Amend Policy CCH1 as follows:</p> <p>CCH1 - Renewable Energy within Pre-Assessed Areas and Local Search Areas</p> <p>Proposals for large scale wind farms of 10MW and over will be permitted within identified Pre-Assessed Areas for Wind Energy, as identified in “Future Wales” subject to them meeting them meeting criteria set below.</p> <p>Proposals for solar developments of 5MW and larger will be permitted in the following identified Local Search Areas and as identified on the proposals map, provided they do not have an unacceptable impact on visual amenity or landscape character and that they meet the criteria set below.</p> <p>LSA (A) – North East of Farmers LSA (B) – Mynydd Pencarreg LSA (C) – West of Talley</p> <p>a. The development will not have an unacceptable impact on roads, rail or aviation safety; electromagnetic interference to communications installations, radar or air</p>	<p>Please notify the Inspectors when the Welsh Government have responded.</p>

	<p>traffic control systems, emergency services communications or other telecommunications systems; and</p> <p>b. Proposals will not cause an unreasonable risk or nuisance to, and impact upon the amenities of, nearby residents or other members of the public, and will not result in unacceptable loss of public accessibility to the area; and</p> <p>c. Proposals should be accompanied with appropriate mitigation measures where required, including satisfactory restoration of land following decommissioning.</p>	
	<p>The addition of a sentence to the end of paragraph 11.476:</p> <p>11.482 Within Pre-Assessed Areas for Wind Energy, the Welsh Government has undertaken an assessment to identify these areas in order to provide certainty, in principle, where large-scale wind energy schemes would be acceptable. Developments of over 10MW within local search areas will be determined in accordance with Future Wales.</p>	
	<p>Amendment to paragraph 11.477 as follows,</p> <p>11.477 Policy ies CCH1 and CCH2 apply to all-renewable and low carbon energy developments that require planning permission and are determined by the Council. The policies and set out the criteria against which proposals will be assessed. Such developments may include onshore windfarms, wind turbines, solar installations, biomass, energy from waste, hydro-power and combined heat, and power. Large scale energy developments (of 10MW+) are determined by in accordance with Policy 18 in Future Wales: the National Plan 2040. These policies are only applicable to applications falling below this threshold.</p>	
AP6/3	<p>Insert new paragraphs in reasoned justification after para 11.482</p> <p>Agricultural land identified as best and most versatile good-quality (grades 1,2 or 3a) and high carbon soils should only be developed if there is an overriding need for the development. Other land should be considered first and where the proposal cannot be located on alternative land, it must be appropriately justified.</p>	<p>Subject to the suggested amendments the changes are agreed.</p>

Recognition is given to the diverse and high-quality landscapes across the county. In this respect, specific reference is made to policy BHE2: Conserving and Enhancing Landscape Character of this Plan which sets out the considerations in relation to Landscape character which comprises natural, cultural and perceptual factors and includes visual/scenic. Further reference is made to the supporting Landscape Character Assessment as prepared through Supplementary Planning Guidance (SPG). This SPG defines specific Landscape Character Areas which build upon LANDMAP aspect area evaluations and landscape and historical designations to provide a baseline tool for identifying the patterns and individual combinations of features that define a recognisable 'sense of place' which make each Landscape Character Area distinct and to inform decision making.

Amend Policy CCH2 as follows:

CCH2: Renewable Energy Outside Pre-Assessed Areas and Local Search Areas

Proposals for renewable and low carbon energy development and associated infrastructure, will be permitted provided they accord with the following:

- a. The development will not have an unacceptable impact on visual amenity or landscape character through the number, scale, size, design and siting of turbines and associated infrastructure;
- b. The development will not have an unacceptable impact upon **landscape character areas designated for their landscape value**;
- c. Wind turbine developments should not have unacceptable cumulative impacts in relation to existing wind turbines components, those which have permission or are proposed;
- d. The development will not have an unacceptable impact on roads, rail, or aviation safety; electromagnetic interference to communications installations, radar or air traffic control systems, emergency services communications or other telecommunications systems;
- e. Proposals will not cause an **unacceptable-unreasonable** risk or nuisance to, and impact upon the amenities of, nearby residents or other members of the public, and will not result in unacceptable loss of public accessibility to the area;

	<p>f. Proposals should be accompanied with appropriate mitigation measures where required, including satisfactory restoration of land following decommissioning.</p>	
AP6/4	<p>Amend Policy CCH4 as follows:</p> <p>CCH4: Water Quality and Protection of Water Resources</p> <p>Development proposals must make efficient use of water resources and, where appropriate, contribute towards improvements in water quality. Proposals will be permitted where they do not have an adverse effect upon water resources, water quality, fisheries, nature conservation, public access, or water related recreation use in the County.</p> <p>Where appropriate, SuDS must be implemented with approval required through the Sustainable Drainage Approval Body (SAB).</p> <p>Proposals will be supported if they promote the safeguarding of watercourses through ecological buffer zones or corridors, protecting aspects such as riparian habitats and species, water quality, and providing for flood plain capacity.</p> <p>Development will only be permitted if it can be demonstrated that there is no adverse effect on the integrity of phosphorus nutrient sensitive riverine Special Areas of Conservation (SACs). In the hydrological catchment area designated for riverine SACs, development creating wastewater discharges will be required to demonstrate there is no increase in phosphorus levels in the SAC. This can be achieved through implementation of mitigation measures and associated supplementary planning guidance. Where evidence demonstrates that adverse effects on the integrity of river SAC can be avoided or offset using mitigation, these must be agreed with the Council on a case-by-case basis, in consultation with NRW.</p> <p>Amend paragraph 11.511 of the reasoned justification for policy CCH4 as follows.</p> <p>11.511 Additional considerations apply to new development where there is the potential for increases in phosphorus, particularly because of waste water discharges, to have an adverse effect on the integrity of the Afon Cledau, Afon Teifi, Afon Tywi and River Wye Special Areas of Conservation (SAC's), in line with the Habitats Regulations 2017 (as amended). Additional considerations apply to development where</p>	Changes agreed.

there is the potential for excess nutrients to have an adverse effect on the integrity of Special Areas of Conservation (SAC), in line with the Habitats Regulations 2017 (as amended).

Amend the reasoned justification to policy CCH4 to include the following new paragraph after 11.512.

Within the hydrological catchment area designated for SACs, development will be required to demonstrate no adverse effect on the integrity of nutrient sensitive SACs. Where evidence demonstrates that adverse effects on the integrity of SAC can be avoided or mitigated or that sufficient capacity exists at the associated treatment works, this must be agreed with the **planning authority Council** on a case-by-case basis, in consultation with NRW.

Amend paragraphs 11.513 to 11.515 of the reasoned justification for policy CCH4 as follows.

11.513 In January 2021, **Natural Resources Wales (NRW)** set **new tighter** phosphorus standards for riverine Special Areas of Conservation (SACs). In respect of Carmarthenshire, compliance tests undertaken by NRW found failure to meet these new standards in the Afon Cleddau and Afon Teifi. Reference is made to the subsequent updates of the NRW Guidance which sets out the wider consideration of nutrients (as opposed to the singular issue of phosphates) within the protected riverine SACs.

11.514 To facilitate delivery of development which may be affected by this policy, the Council has **ve** prepared 'the 'Afon Tywi and Afon Teifi **Phosphorus Reduction Strategy** **Nutrient Neutrality Action Plan**'. The document sets out the strategic approach for delivering **nutrient reductions (including phosphorus) reductions** in these catchments while also facilitating LDP growth and demonstrating that mitigation can be delivered **in practice**. The document sets out a range of measures, which have been agreed in consultation with NRW. The 'Afon Tywi and Afon Teifi **Nutrient Neutrality Action Plan** **Phosphorus Reduction Strategy**' are living documents that will develop during the lifetime of the LDP, in consultation with NRW.

11.515 The delivery of the 'Afon Tywi and Afon Teifi **Nutrient Neutrality Action Plan** **Phosphorus Reduction Strategy**' will be supported by the established of Afon Tywi, Teifi and Cleddau Nutrient Management Boards (NMB's). ~~These Boards which will have wider duties with a broader aim to deliver the long-term solutions on a catchment basis, both to address the issue of excessive phosphorus in rivers, generated~~

~~from existing activities and land uses in the wider catchment, and to identify measures which might be relied upon to deliver wider benefits and net reductions across the catchment.~~ These collaborative partnerships work on a catchment scale across local authority boundaries. The remit of the Boards ascribed by Welsh Government is to produce actionable evidence-based plans to restore freshwater SACs to a favourable conservation status for phosphate, whilst also enabling sustainable development within nutrient sensitive catchments. These measures are outside the scope of the LDP ~~and planning~~ but are important for a robust approach to ~~reducing phosphorus~~ mitigating excess nutrients in Carmarthenshire's ~~riverine~~ SAC's.

The Council has advanced the Action Plan recommendations on both a strategic and developer-led basis. This work has and continues to be undertaken both through Carmarthenshire led initiatives, and the collaborative arrangements of the NMBs across the sub region, notably for the Afon Teifi and Tywi catchments. As a core member of the NMBs, Carmarthenshire have contributed to the NMPs to ensure the feasibility of delivering nutrient neutral housing requirements detailed in the 'Afon Tywi and Afon Teifi Nutrient Neutrality Action Plan'. In addition to measures being explored by the NMBs, the Council will also seek to expedite the plans through capital schemes and or through external funding opportunities. Delivery of the action plans will not only meet environmental water quality objectives but will address the growth requirements set out in the Revised LDP and the delivery trajectories. The Action Plan will be amended in a responsive manner to changes in NRW policy, and changes in headroom capacity offered through NRWs review of permits.

The Tywi and Teifi NMBs have identified strategic actions that can be taken to allow development to continue within its respective catchments as identified in the Revised LDP without increasing the nutrient loading in the river. They have also identified broader actions to achieve the phosphorous favourable conservation target of the river. The NMBs have produced live Nutrient Management Plans for the affected catchments with evolving delivery agreements.

CCC has produced a library of resources to assist developers in bringing forward nutrient neutral proposals. These open access resources are regularly updated and can be accessed via the CCC website. The West Wales Nutrient Budget calculator, and Mitigation Guidance (published June 2023) remain the only catchment specific tools available in Wales. Developer led proposals further benefit from NMB expertise in appraising complex developers led mitigation proposals.

Further SPG will be prepared to supplement this policy ~~produced to support the policy and mitigation approaches identified and to further elaborate on the role of s106 and developer contributions.~~

<p>AP6/5</p>	<p>Delete Policy CCH5. This results in consequential changes to the following CCH policy numbers within the Plan.</p> <p>CCH5: Flood Risk Management and Avoidance Proposals for development located within areas of identified flood risk will only be permitted in exceptional circumstances, where:</p> <ul style="list-style-type: none"> a) In areas at risk of fluvial, pluvial, coastal and reservoir flooding, where it can be demonstrated that the development meets the justification tests set out within National Policy and is supported by robust technical evidential statement. However, only less vulnerable development will be permitted within Zone C2. b) Where it would not have a detrimental effect on the integrity of existing fluvial, pluvial, or coastal flood defences, or would impede access to existing and future defences for maintenance and emergency purposes; c) it would not lead to an unacceptable increase in the risk of flooding on the site or elsewhere will not be permitted; or, d) In areas subject to flood risk from localised sources, a drainage strategy is submitted which demonstrates to the Council's satisfaction that the impacts can be managed or alleviated. <p>Proposals should seek to incorporate effective and environmentally sympathetic flood risk mitigation measures, such as SuDS.</p> <p>Proposals where there is the potential for floodplain reconnection should be incorporated into the development to ensure that opportunities are maximised, and that floodplain storage and water flow are not adversely affected.</p> <p>11.520 The majority of Carmarthenshire's settlements are located by rivers or the coast. This reflects the historical development pattern and whilst the Plan cannot influence the spatial patterns of the past, it can help shape the decisions with the wellbeing of future generations in mind.</p>	<p>Change agreed.</p>

	<p>11.521 Whilst an understanding and recognition of river and tidal flooding has been implicit in planning practice for many years, there is now an increasing awareness of other sources of flooding—notably surface water. These other sources can impact upon settlements that are not close to a river or the coast.</p> <p>11.522 The policy, and the strategic direction of the Plan recognises and reflects the need for a sustainable approach to flood risk. As such, this Plan prioritises the protection of the undeveloped or unobstructed floodplain from development and seeks to prevent the cumulative effects of incremental development. However, it also seeks to recognise that the dynamics of flood risk are complex and extend beyond the on-site connotations in respect of the siting of an individual development.</p> <p>11.523 The Plan has regard to the provisions of national planning policy on flood risk and a precautionary approach has been taken in formulating policies which identify land use allocations and site specific proposals. The Plan also looks to recognise the dynamic nature of flood risk but also their vital contribution to the environmental qualities, biodiversity, green and blue infrastructure network, and the intrinsic landscape value of the County.</p> <p>11.524 The contribution of natural channel processes is recognised, and the policy encourages floodplain reconnection. Consequently, developments and notably new infrastructure should be designed in a way which does not result in the net loss of floodplain storage, impede water flows, or increase flood risk elsewhere. Regard should be had to the Working with Natural Processes (WWNP) Floodplain Reconnection Potential.</p> <p>11.525 National policy in respect of flood risk is set out within Technical Advice Note 15: Development and Flood Risk (2004). The fluvial and tidal flood risk areas are set out on the accompanying Development Advice Maps (DAM). These areas are categorised as 4 zones, namely Zone A, Zone B, and more notably Zones C1 and C2 which are more susceptible to flooding.</p> <p>11.526 Development will only be considered in areas at a high risk of flooding where it can be demonstrated that the site can comply with the justification and assessment requirements set out in TAN 15. Where a development is proposed in an area of identified flood risk an accompanying technical evidential statement must be provided to satisfy the provisions of TAN15 and show clearly that the new development will alleviate the threat and consequences of flooding.</p>	
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AP6/5	<p>Consequential amendment to the reasoned justification of Policy SP16 - paragraph 11.471:</p> <p>11.471 Proposals affected by flood risk will be required to submit a Flood Consequences Assessment as part of any planning application and the Council will consult with Natural Resources Wales (NRW). Where a site is in part impacted upon by flood risk, the developer will need to consider the impact of the risk on the developability of the remainder of the site. Where appropriate they should undertake the necessary evidential work (including a Flood eConsequences aAssessment) to the satisfaction of NRW. Development will only be considered in areas at a high risk of flooding where it can be demonstrated that the site can comply with the justification and assessment requirements set out in TAN 15. Where a development is proposed in an area of identified flood risk an accompanying technical evidential statement must be provided to satisfy the provisions of TAN15 and show clearly that the new development will alleviate the threat and consequences of flooding. Only less vulnerable development will be permitted within Zone C2. Regard should be had to Policy CCH4: Flood Risk Management and Avoidance as contained within this Plan.</p>	Subject to the suggested amendments the changes are agreed.
AP6/6	<p>Amend Policy CCH6 as follows. This is already considered through national policy in Future Wales (Policy 16) and represents unnecessary duplication.</p> <p>An amendment to the reasoned justification is proposed below to link over to the provisions of Future Wales.</p> <p>CCH6: Renewable and Low Carbon Energy in New Developments</p> <p>Development proposals which connect to that connect to existing sources of renewable energy, district heating networks, or use low carbon technology will be supported.</p> <p>Development proposals that include: residential development of 100 or more homes; or commercial development with a total floorspace of 10,000sq m 1,000sqm or more; will be required to submit an Energy Assessment to determine the feasibility of incorporating such a scheme, and where viable, would be required to implement the scheme.</p> <p>Major developments that consume significant energy will be encouraged to facilitate the development of, and/or connection to proposed District Heating and Cooling Networks.</p>	Changes agreed.

	<p>Amend paragraph 11.528 the reasoned justification to Policy CCH6 as follows.</p> <p>11.528 An Energy Assessment will investigate the potential to incorporate and use low carbon technology, or to use existing sources of renewable energy or district heating networks. Assessments will be required to demonstrate how the development can make a contribution towards increased levels of energy generation from renewable or low carbon sources. Regard should be had to the provisions of Future Wales: the National Plan 2040 and specifically Policy 16. This requires that large scale, mixed-use developments of 100 or more dwellings or 10,000 sqm or more of commercial floorspace should, where feasible, have a heat network with a renewable / low carbon or waste heat energy source. In accordance with Future Wales planning applications for such development should prepare an Energy Masterplan to establish whether a heat network is the most effective energy supply option and, for feasible projects, a plan for its implementation.</p>	
AP6/7	<p>The inclusion of two policies in the Plan reflect substantive differences in their purpose. In this respect PSD4 relates specifically to trees woodlands and hedgerows where they form part of or are affected by new development proposals. It is noted that whilst the policy may require some new planting where it is related to or arising from the development.</p> <p>This contrasts with CCH7 which seeks to support the creation of woodland, forests, tree belts and corridors as well as supporting their protection and/or enhancement. The Council considers the inclusion of this policy to form an important support mechanism in relation to its ambition in responding to not only the climate and nature emergencies but also its responses in relation nutrients in protected riverine SACs and flood risk. In this respect the policy makes specific reference to multiple benefits accrued as they relate to ecosystems resilience and are not matters directly related to or considered through PSD4.</p> <p>It is also considered that the merging of the policies would potentially risk conflating their purpose and result in a lack of clarity.</p> <p>It is however, proposed to amend the policies and reasoned justification as set out below.</p>	<p>Subject to the suggested amendments the changes are agreed.</p>

Amend Policy PSD4 as follows. Undertake consequential changes within the Plan to reflect changes in the policy title. Reference is also made to the Council's response in relation to AP1/12 in relation to paragraph 11.306 of the reasoned justification to policy PSD4.

PSD4: Green and Blue Infrastructure – Trees, Woodlands and Hedgerows in New Developments

Proposals for development shall:

- a) Maximise retention, protection, and integration of existing trees, woodlands and hedgerows and prioritise those of highest value, quality, and condition within and on the development site boundaries through iterative site layout design which avoids potential impacts;**
- b) Minimise potential impacts to retained trees, woodlands and hedgerows through site specific design, method statements and protection measures.**
- c) Provide appropriate compensation planting for unavoidable loss of trees, woodlands, and hedgerows to deliver overall enhancement to extent and cover. Opportunities for translocation of existing hedgerows should be considered where feasible;**
- d) Provide sufficient space and rooting volume within site layout and in relation to adjacent land uses to enable effective growth of existing and newly planted trees, woodlands, and hedgerows to maturity and to avoid potential challenges to retention for the lifetime of the development;**
- e) Identify and deliver management works to improve the value, quality and condition of existing trees, woodlands, and hedgerows within and on the development site boundaries; and**
- f) Deliver additional planting of trees, woodlands, and hedgerows appropriate to the site and development type that will deliver both long term landscape benefits and net benefits for biodiversity.**

Amend paragraph 11.302, 11.303, 11.304 of the reasoned justification to Policy PSD4 as follows:

11.302 The policy recognises the important contribution trees, woodlands and hedgerows can have to the environment and to our communities. Trees and woodlands play an important role within the plan area and are intrinsic to the landscape and urban character whilst providing habitat and increasing climate change resilience. ~~Well-designed tree, woodland and hedgerow planting can help address both the Climate and Nature Emergencies, as declared by Welsh Government and the Council.~~

11.303 Their contribution within the urban form **and placemaking including as part of new developments** is particularly recognised. They can help tackle air pollutants, flooding, and noise pollution, and provide numerous other benefits including the provision of shade and visual amenity. They also provide extensive areas of habitat for wildlife, especially mature trees. Carmarthenshire's GBI network reflects tier importance in the urban realm and within our towns and villages - in both public and private spaces, along linear routes, and waterways, and in amenity areas.

11.304 **References to compensation planting and additional planting within Policy PSD4 should be considered in the context of the replacement planting ratios and specifications set out in Planning Policy Wales.** We consider their retention and additional new planting associated **with new development** to be an important part in creating a cohesive and healthy communities within a valued and biodiverse rural and landscape context. All planning applications **for development** should **(where appropriate)** be accompanied by a tree survey where trees are present on site. This should include protection, mitigation, and management measures. Appropriate long-term and short-term management measures must be implemented to protect newly planted and existing trees, woodlands, and/or hedgerows. ~~Reference may be made to Policy CCH7.~~

Amend Policy CCH7. In addition, amend reasoned justification to Policy CCH7 which include paragraphs 11.530 and 11.531, inserting a new paragraph after 11.531, and amend paragraphs 11.532 and 11.534.

CCH7: Climate Change – Forest, Woodland, and Tree Planting

Support will be given to **development** proposals which seek the creation **and protection** of new (or the enhancement of existing) woodland, forests, tree belts and corridors, and where they promote the delivery of the national and local decarbonisation targets.

Support will be given to proposals that will deliver the multiple **(ecosystems)** benefits associated with well-designed and well managed trees, woodlands, and forests (e.g., carbon sequestration, flood alleviation, improvements in air and water quality, nutrient mitigation, biodiversity and nature recovery, landscape, health and well-being, and amenity value).

Proposals should consider potential adverse effects upon the environment, **flood risk management**, cultural heritage, communities, and landscape, and, where appropriate, follow the mitigation hierarchy.

11.530 In 2021, Welsh Government has identified a target of increasing woodland cover in Wales by at least 5,000 hectares per annum to tackle the climate emergency ^[101]. This policy reflects this national objective and the commitment to the creation of a national forest. There are opportunities to create links to GBI, ~~incorporate active travel facilities~~ and enhance tourism and leisure opportunities, as well as promoting enhanced biodiversity, connectivity, and ecosystems resilience. Well-designed woodland planting can address both the Climate and Nature Emergencies, as declared by Welsh Government and the Council.

11.531 Trees are recognised as have multiple benefits, as outlined within the South West Wales Area Statement ^[102] and The Welsh Government's Strategy for Woodlands and Trees ^[103]. Trees, forest, and woodland provides a range of ecosystem services, such as improving air quality, providing a cooling effect and shade in summer, reducing noise, carbon sequestration and increasing resilience to climate change trees, forests and woodlands also offer aesthetic and amenity value, ~~and can act as landmark features within our settlements and open countryside~~. They can contribute to nature conservation and increase biodiversity, and often have historic and recreational value. They also help to generate a feeling of 'well-being' and have an economic benefit.

	<p>New paragraph number - As part of this ecosystem's services approach tree and woodland planting also bring benefits in minimising run off from soils and can assist in mitigation for nutrients in our rivers particularly where they relate to the NRW Guidance on protected riverine SACs. This can have shared benefits for instance in relation to upstream flood solutions but also creating planted riverine corridors.</p> <p>11.532 The planting of trees, woodlands and forests can assist in tackling issues around flood risk, providing a soft engineering solution which can be undertaken in isolation or in conjunction with hard infrastructure (man-made structures). Proposals will be expected to demonstrate how they will contribute to flood risk alleviation. The planting of trees, woodlands and forests can, in some locations, assist in tackling issues around flood risk, providing a soft engineering solution which can be undertaken in isolation or in conjunction with hard infrastructure (man-made structures). Proposals will be expected to demonstrate how they will contribute to flood risk alleviation and not result in adverse flood risk consequences.</p> <p>11.534 Proposals must be appropriate to the cultural and ecological character of the locality, in addition to the wider landscape. The Plan supports the planting of a type, scale, design, and species mix (including the planting of native species) that is appropriate to the locality. Where appropriate, support may also be given towards land-use change for proposals which are design to mitigate the impacts of climate change and have multiple benefits (as highlighted above). As proposals should consider potential adverse effects upon the landscape, nature conservation, and the historic environment in line with the mitigation hierarchy, specific reference is made to Policies NE1, NE2, and BHE 12.</p>	
AP6/8	<p>Amend Strategic Policy SP17 as follows:</p> <p>Strategic Policy – SP-17: Transport and Accessibility</p> <p>Sustainable and deliverable development requires an integrated, accessible, reliable, efficient, safe, and sustainable transport network to underpin delivery. The Plan therefore contributes to the delivery of a sustainable transport system and associated infrastructure through:</p> <p>a) Reducing the need to travel, particularly by private motor car;</p>	Changes agreed.

	<ul style="list-style-type: none"> b) Addressing social inclusion through increased accessibility to employment, services, and facilities; c) Supporting and, where applicable, enhancing alternatives to the motor car, such as public transport (including park and ride facilities and encouraging the adoption of travel plans) and active travel through cycling and walking; d) Re-enforcing the function and role of settlements in accordance with the settlement framework as defined within Policy SP3; e) Promoting the efficient use of the transport network; f) Enhancing accessibility to places of employment, homes, services, facilities, and other significant trip generating proposals at locations with access to appropriate transport infrastructure; g) The incorporation of design and access solutions within developments to promote accessibility; h) Providing walking and cycling routes, linking in with active travel and green and blue infrastructure networks; i) Providing for new technological solutions through Ultra Low Emission Vehicles Charging Points in new developments; and, j) Adopting a sustainable approach to the design, function, and layout of new development, including providing appropriate levels of parking. 	
AP6/9	<p>Amend policy TRA2 to make paragraph 2 clearer.</p> <p>TRA2: Active Travel</p> <p>Development P proposals which enhance walking and cycling access by incorporating the following within the site, and/or making financial contributions towards the delivery of off-site provision, will be supported:</p> <ul style="list-style-type: none"> a) Permeable, legible, direct, convenient, attractive and safe walking and cycling routes connecting the development to: surrounding settlements; public transport nodes; community facilities; commercial and employment areas; tourism facilities; and, leisure opportunities; 	<p>Subject to the suggested amendments the changes are agreed.</p>

- b) Improvements, connections, and/or extensions to: footpath network and existing PROWs (including bridleways); cycle network and routes; Safe Routes to School; and, routes forming part of the Green and Blue Infrastructure network; and
- c) Facilities that encourage the uptake of walking and cycling, including: appropriate signage; secure and convenient cycle parking; and changing and associated facilities.

P-Any development proposals which have a significant adverse impact on a **Public Rights of Way ROW** or existing routes identified through the Active Travel (Wales) Act 2013 will be expected **to provide alternative routes through the** ~~contribute to the~~ delivery of the **Council's Cycling Strategy and Active Travel Network Map.** ~~Active Travel Plan.~~

Amend paragraph 11.552 of the reasoned justification to policy TRA2 as follows.

11.552 The Plan seeks to promote accessibility to alternative means of transport to help reduce car use, and to support the Council in fulfilling its legal duty under the Active Travel (Wales) Act 2013 to develop, improve and maintain local walking and cycling networks. Proposals will be encouraged to use Standards of good practice including the Active Travel Act Design Standards and other relevant guidance to ensure the design principles reflect and deliver Active Travel. **Appendix 5 of the Plan identifies the Active Travel Routes.** Regard should also be had to the Council's Highways Design Guide.

Amend Policy TRA5 to make mention of the Council's parking standards

TRA5: Highways and Access Standards in Development

Proposals for development will be permitted where they:

- a) Incorporate the necessary access standards reflecting the road classification and conditions;
- b) Include appropriate visibility splays and design features necessary to ensure highway safety and that the ease of movement is maintained, and enhanced where required;

	<p>c) Do not generate unacceptable levels of traffic which has a detrimental impact on the surrounding road network, highway safety, or would cause significant harm to the amenity of residents.</p> <p>d) Are in accordance with the Council's parking standards.</p> <p>e) Will not result in offsite congestion in terms of parking or service provision</p> <p>-----</p> <p>Amend paragraph 11.560 of the reasoned justification of policy TRA5 to reference the relevant documents associated with the parking standards.</p> <p>11.560 In using this policy, reference should also be made to Policy PSD1: Sustainable and High-Quality Design and to the content of the Highways Design Guide, and the Council's parking standards (CSS Wales Parking Standards (2014)). The Highways Design Guide and the authority's parking standards will be adopted as SPG. The parking standards shall be applied flexibly in accordance with national policy.</p>	
AP6/10	<p>Amend Strategic Policy SP18 as follows.</p> <p>Strategic Policy SP 18: Mineral Resources</p> <p>The County's identified mineral resources will be sustainably managed by:</p> <p>a) Ensuring an adequate supply of minerals, including maintaining an adequate landbank of permitted aggregate reserves (a minimum 10 years for hard crushed rock, and a minimum 7 years for sand and gravel) throughout the Plan period;</p> <p>b) Encouraging the efficient and appropriate use of high quality minerals and maximising the potential for the re-use and recycling of suitable minerals as an alternative to primary won aggregates;</p> <p>c) Safeguarding minerals infrastructure, and areas underlain by minerals of economic importance where they could be worked in the future, to ensure that such resources and infrastructure are not unnecessarily sterilised by other forms of development;</p>	Change agreed.

	<p>d) The use of buffer zones to reduce the conflict between mineral development and sensitive development; and</p> <p>e) Securing appropriate restoration which can deliver specific environmental and community benefits.</p> <p>An 'Area of search' for Sand and Gravel has been defined on the Proposals Map which will form the basis for future exploration and production in order to satisfy the broader subregional requirements.</p>	
AP6/11	<p>Amend Policy MR1 as follows.</p> <p>MR1: Mineral Proposals</p> <p>Proposals for mineral extraction will be permitted where there is a proven national, regional or local need for the mineral which cannot be met from existing sources or from secondary or recycled material, and where they would not result in any significant adverse impacts upon public health, the environment, local amenity and the local transport network. Applications for minerals proposals will be assessed against the following criteria:</p> <p>a) Suitable access and transport routes have been identified and the potential for minerals to be transported by means other than road has been adequately assessed;</p> <p>b) Noise is demonstrated to be within acceptable levels;</p> <p>c) The best practicable means are identified to control dust, smoke, fumes and to ensure that operations do not cause a deterioration in local air quality or an unacceptable impact on public health;</p> <p>d) Blasting is controlled within acceptable levels;</p> <p>e) Potential impacts on groundwater resources, surface water resources and water supplies are identified and demonstrated to not cause adverse effects and be within acceptable levels;</p>	<p>Subject to the suggested amendments the changes are agreed.</p>

	<p>f) There are no unacceptable adverse impacts upon sites of nature conservation importance and ecological features, and adverse impacts upon sites of historic, cultural and landscape importance are identified and demonstrated to be minimal;</p> <p>g) Effective mitigation measures proposed to minimise any potential effects from subsidence or land instability have been identified and demonstrated to the planning authority's Council's satisfaction;</p> <p>h) Adverse impact on landscape character and visual amenity is not significant;</p> <p>i) Opportunities for the re-use and/or recycling of mineral waste are maximised;</p> <p>j) Satisfactory proposals have been submitted for restoration, landscaping, after use, and after care of the site; and</p> <p>k) Effective measures should ensure that utilities infrastructure is protected.</p>																	
AP6/12	<p>Amend Policy MR2 as follows.</p> <p>MR2: Mineral Buffer Zones</p> <p>Provision has been made for Buffer Zones around all sites with extant planning permission for mineral working.</p> <p>New sensitive non-mineral development will not normally be permitted within the identified buffer zones. All buffer zones have been identified on the proposals map, and are listed in the following table:</p> <table><tr><th colspan="4">Active/Inactive Sites</th></tr><tr><th>LDP Reference</th><th>Quarry Name</th><th>Site Status</th><th>Mineral Extracted</th></tr><tr><td>M1</td><td>Alltygarn</td><td>Inactive</td><td>Silica Sandstone</td></tr><tr><td>M2/M3</td><td>Garn Bica/Maesdulais</td><td>Active</td><td>Limestone</td></tr></table>	Active/Inactive Sites				LDP Reference	Quarry Name	Site Status	Mineral Extracted	M1	Alltygarn	Inactive	Silica Sandstone	M2/M3	Garn Bica/Maesdulais	Active	Limestone	Changes agreed.
Active/Inactive Sites																		
LDP Reference	Quarry Name	Site Status	Mineral Extracted															
M1	Alltygarn	Inactive	Silica Sandstone															
M2/M3	Garn Bica/Maesdulais	Active	Limestone															

M4/M5/M6	Torcoed/Torcoed Fawr/Crwbin	Active	Limestone
M7	Blaenyfan	Inactive	Limestone
M8	Pennant	Active	Sandstone
M9	Coygen	Active	Limestone
M10	Garn Wen	Active	Igneous
M11	Dinas	Inactive	Sandstone
M12	Llwynjack Farm	Active	River Shoal / Sand and Gravel
M13	Glan Lash Opencast Coal Site	Inactive	Opencast Coal
M14	Foelfach	Active	Sandstone
M15	Llanelli Sand Dredging Ltd ¹	Active	Marine Sand
Dormant Sites			
LDP Reference	Quarry Name	Site Status	Mineral Extracted
M16	Pwllymarch	Dormant	Limestone
M17	Llwynyfran	Dormant	Limestone
M18	Tyr Garn	Dormant	Limestone
M19	Garn	Dormant	Sandstone
M20	Limestone Hill	Dormant	Limestone

¹ Operations do not involve the extraction of minerals and so no buffer zone is required around the site. Also safeguarded is the marine landing site situated approximately 800m to the east of the Llanelli Sand Dredging site due to its importance in the landing of marine sand.

	<table><tr><td>M21</td><td>Penybanc</td><td>Dormant</td><td>Limestone</td></tr><tr><td>M22</td><td>Cynghordy</td><td>Dormant</td><td>Sandstone</td></tr><tr><td>M23</td><td>Glantowy</td><td>Dormant</td><td>Sand and Gravel</td></tr></table> <p style="text-align: right;">Table XX</p> <p>N.B. a small portion of the buffer zone of Gilfach Quarry (in Pembrokeshire) extends over the border into Carmarthenshire and has been identified on the Proposals Map</p>	M21	Penybanc	Dormant	Limestone	M22	Cynghordy	Dormant	Sandstone	M23	Glantowy	Dormant	Sand and Gravel	
M21	Penybanc	Dormant	Limestone											
M22	Cynghordy	Dormant	Sandstone											
M23	Glantowy	Dormant	Sand and Gravel											
AP6/13	Reference is made to Appendix 1 below.	Changes agreed.												
AP6/14	<p>Amend Strategic Policy SP19 as follows.</p> <p>Strategic Policy – SP 19: Sustainable Waste Management</p> <p>Provision will be made to facilitate the sustainable management of waste through:</p> <ul style="list-style-type: none">a) The allocation of adequate, appropriate land to provide for an integrated network of waste management facilities;b) Supporting proposals for waste management which involve the management of waste in accordance with the ranking set out within in the waste hierarchy;c) Supporting proposals which have regard to the nearest appropriate installation concept and principles of proximity and self-sufficiency²;d) Supporting proposals for new in-building waste management facilities at existing and allocated industrial sites (B2 use) which are suitable for waste management facilities;e) Acknowledging that certain types of waste facility may need to be located outside the development limits of settlements;	Changes agreed.												

² Article 16 of the EU Waste Framework Directive, 2008

	<p>f) Ensuring that provision is made for the sustainable management of waste in all new development, including securing opportunities to minimise the production of waste.</p> <p>Development proposals must ensure that:</p> <ul style="list-style-type: none"> i. 1. There are no significant, adverse effects upon public health, the environment, local amenity and the local transport network; and ii. 2. The proposal is compatible with any neighbouring uses or activities. <p>The co-location of waste management facilities to enable the development of heat networks will be supported, subject to the above criteria; and</p> <p>Waste related proposals must be supported by an appropriate Waste Planning Assessment.</p>	
AP6/15	<p>Amend Policy PSD5 as follows.</p> <p>PSD5: Development and the Circular Economy</p> <p>Development proposals will be required to demonstrate, via the submission of a natural materials management plan, how the generation of waste has been minimised and any waste generated managed in order to keep resources in use for as long as possible in:</p> <ul style="list-style-type: none"> a. the layout and design of the development; b. any demolition and construction phase; c. respect of any opportunities for utilising waste for re-use and recycling; and d. respect of any opportunities for utilising residual waste as a source of fuel. <p>Amend paragraph numbers 11.308 and 3.311 of the reasoned justification as follows</p> <p>11.308 In order to facilitate the requirements of this policy, all development proposals, regardless of scale, will need to be accompanied by a natural materials management plan. The Plan should identify</p>	<p>Subject to the suggested amendments the changes are agreed.</p>

	<p>all the natural materials on the site prior to the development, these may be existing buildings to be demolished or the natural ground to be disturbed. It should explain how the generation of waste from these materials will be minimised and that the design and layout has fully considered the need to ensure that a cut and fill balance is as close to neutral as possible. The content of the natural material management plan shall be proportionate to the scale of proposed development.</p> <p>11.311 Construction sites inevitably require a degree of cut and fill engineering operations. As part of site treatment, the cut and fill balance of materials excavated should be assessed so as to avoid the creation of waste which cannot be effectively re-used due to lack of suitable storage facilities. As part of the natural material resources management plan developers should design proposals to achieve an earthwork balance which seeks to minimise cut and fill or which may provide for remediation of land elsewhere in the area.</p> <p>NB reference is made to Action point AP1/10 in relation to Policy PSD5 in Hearing Session 1.</p>	
AP6/16	<p>Amend Policy WM3 as follows.</p> <p>WM3: Agricultural Land – Disposal of Inert Waste</p> <p>Proposals for the deposit of imported inert waste materials for the improvement of low-grade agriculture land will only be permitted where:</p> <ul style="list-style-type: none"> a) It can be demonstrated that the improvement sought is reasonably necessary for the purposes of agriculture within the holding; b) The volume of waste to be deposited is the minimum necessary to achieve the improvement sought; c) Arrangements are in place for the separation and removal of any non-inert waste, or contaminated soils, received in error; and d) The extent, thickness and final surface treatment of the deposit is compatible with the surrounding landform. 	Change agreed.

AP6/17	<ol style="list-style-type: none"> 1. Reference is drawn to the commentary set out within Appendix A of the Financial Viability Report -May 2024 (CSD32) which sets out the comments raised by Burrows Hutchinson Limited (BHL) regarding the general allowance for sprinkler systems, ULEV charging points and other costs associated with Part L changes to Building Regulations. In total the figures £2,000 per dwelling for sprinklers, £550 per dwelling for ULEV charging points, and £3,000 per dwellings for Part L are taken forward within the high viability assessment. The summary of costs is set out within Appendix B of the Addendum report with the total of £5,550 considered within the costs report. Therefore, this allowance covers the requirements of Policy CCH3. 2. In terms of the commentary from the viability workshop no further evidence was provided by stakeholders relating to ULEV charging points, therefore the assumptions set out by BHL have been factored into the high-level assessment. 	Noted and accepted.
AP6/18	<p>MR3: Mineral Safeguarding Areas</p> <p>Planning permission will not be granted for development proposals where they would permanently sterilise mineral resources of aggregate (identified within the mineral safeguarding areas on the proposals map), and minerals related infrastructure unless:</p> <ol style="list-style-type: none"> a. The applicant can demonstrate that the extraction of the mineral is impracticable, uneconomic or environmentally unacceptable (including compromising amenity and social considerations); or b. The mineral resource has already been extracted; or c. The mineral can be extracted satisfactorily prior to the development taking place; or d. The development is of a temporary nature and can be completed and the site restored within the timescale that the mineral is likely to be needed; or, 	Changes agreed.

	<p>e. The nature and location of the development would have no significant impact on the potential working of the resource.</p> <p>11.573 PPW stresses the importance of safeguarding mineral resources, which society may need, as well as the minerals related infrastructure to deliver this need. that meet society's needs now and in the future. This, however, does not necessarily indicate a presumption in favour of working the mineral deposits, merely that the location of the mineral is known. The safeguarded areas shown on the Proposals Map relate to the British Geological Survey (BGS) Aggregate Safeguarding Map for South West Wales.</p>	
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Appendix 1: Minerals Sites

Active/Inactive Sites

LDP Reference	Quarry Name	Site Status	Mineral Extracted	ROMP ³ Review Date
M1	Alltygarn	Inactive	Silica Sandstone	06 Mar 2032
M2	Garn Bica/			01 Feb 2024
M3	Maesdulais	Active	Limestone	13 Mar 2032
M4/M5/M6	Torcoed/Torcoed Fawr/Crwbin	Active	Limestone	01 Sep 2032
M7	Blaenyfan	Inactive	Limestone	04 Oct 2031
M8	Pennant	Active	Sandstone	N/A
M9	Coygen	Active	Limestone	07 Feb 2033
M10	Garn Wen	Active	Igneous	01 Feb 2024
M11	Dinas	Inactive	Sandstone	08 Oct 2028
M12	Llwynjack Farm	Active	River Shoal/ Sand and Gravel	08 Jan 2029
M13	Glan Lash Opencast Coal Site	Inactive	Opencast Coal	N/A
M14	Foelfach	Active	Sandstone	15 Aug 2029
M15	Llanelli Sand Dredging Ltd ⁴	Active	Marine Sand	N/A

³ ROMP – Review of Old Minerals Permissions

⁴ Operations do not involve the extraction of minerals and so no buffer zone is required around the site. Also safeguarded is the marine landing site situated approximately 800m to the east of the Llanelli Sand Dredging site due to its importance in the landing of marine sand.

Dormant Sites

LDP Reference	Quarry Name	Site Status	Mineral Extracted	ROMP Review Dates
M16 M17	Pwllymarch	Dormant	Limestone	Dormant
	Llwynyfran	Dormant	Limestone	Dormant
M18	Tyr Garn	Dormant	Limestone	Dormant
M19	Garn	Dormant	Sandstone	Dormant
M20	Limestone Hill	Dormant	Limestone	Dormant
M21	Penybanc	Dormant	Limestone	Dormant
M22	Cynghordy	Dormant	Sandstone	Dormant
M23	Glantowy	Dormant	Sand and Gravel	Dormant

N.B ROMP reviews are carried out on a 15-year basis. Some sites have N/A due to the remaining permissions being under 15 years. There is no specified date for the submission of applications for the determination of conditions relating to dormant sites, but such sites cannot lawfully recommence working until a new scheme of conditions has been approved.