

Carmarthenshire Revised Local Development Plan 2018-2033

Matters Arising Changes Consultation Report

July 2026

Contents

1. Introduction	2
2. Summary of Representations and Main Issues Raised	2
3. Index.....	3
4. MAC Representations Received and the Council's Responses	11
5. Representation and the Council Response made to the Habitats Regulation Assessment - Addendum to the Matters Arising Changes.....	148
6. Representation and the Council Response made to the Integrated Sustainability Assessment - Addendum to the Matters Arising Changes	150
7. Not Duly Made Representations.....	151

1. Introduction

- 1.1 The Carmarthenshire Revised Local Development Plan (RLDP) 2018-2033 is currently the subject of an Examination. Following the Hearing Sessions held as part of the EiP (from 15 October to 26 November 2024), and additional hearing sessions on 18 and 19 September 2025, the Council compiled a Schedule of Matters Arising Changes (MACs), considered necessary to make the Plan sound. This Schedule was subject to public consultation from 11 May to 26 June 2026 along with the Integrated Sustainability Appraisal (ISA) and Habitats Regulation Assessment (HRA) Addendums to the MACs.
- 1.2 All representors registered on the LDP database were notified of the consultation and the process was publicised via the Council's website. Documents were made available (in hard copy) to view at the Council's Customer Service Hwbs in Carmarthen, Llanelli and Ammanford, and (electronically) at all libraries.
- 1.3 The consultation related only to the changes proposed by the MACs. It did not provide an opportunity for interested parties to re-state previously made representations or submit new representations relating to those parts of the RLDP that remained unchanged. Representors were informed that each representation must specify the MAC or supporting document to which it relates, set out clearly whether the MAC is supported or opposed, and provide appropriate explanation and reasoning, including how the Plan should be changed to make it sound. The Council only considered representations to be duly made if they related specifically to a MAC.
- 1.4 Representations were received via the online consultation portal, by email and post. This report lists the representations made about each of the proposed MACs and provides a summary of the main issues raised and the Council's response to these issues. For those representations received using the online consultation portal the full representation is published within their respective summary section. For representations submitted via email and post, the full submission is available to view as attachments following each Council response.

2. Summary of Representations and Main Issues Raised

- 2.1 In total, 46 representors submitted responses to the consultation; commenting on 50 MACs in total. 5 of the representations did not comment on the specific changes proposed by the MACs and are therefore not considered to be duly made. In addition, one duly made representation was received in respect of the HRA, and one in relation to the ISA.
- 2.2 The following chapters provide a summary of the main issues raised by each representor during the MAC consultation and a Council response for each. Where multiple representations refer to the same MAC, these have been grouped together and a standard response given where appropriate.

3. Index

Respondent Number	Representation Number	Respondent Name	Organisation	MAC	Support / object / comment
5945	5957	Mr Stuart Crocker		MACM/SeC6/c	Object
5946	5958	Mr Mark Edwards		MACM/SeC6/c	Object
2558	5959	The Home Builders Federation (Mark Harris)	The Home Builders Federation	MAC057	Object
2558	5960	The Home Builders Federation (Mark Harris)	The Home Builders Federation	MAC023	Object
5947	5961	Mining Remediation Authority (Mrs Melanie Lindsley, Principal Planning & Development Manager)	Mining Remediation Authority	MAC046	Comment
2703	5962	Lyndon Kervin		MACM/SeC6/f (Most likely referring to MACM/SeC6/c)	Object
5948	5963	Mr Aled Francis		MACM/SeC6/f (Most likely referring to MACM/SeC6/c)	Object
2320	5964	Mr Dewi Griffiths	Dŵr Cymru/Welsh Water	MAC036	Support
2320	5965	Mr Dewi Griffiths	Dŵr Cymru/Welsh Water	MAC046	Comment
5949	5966	Miss Andrea Mckay		MACM/SeC6/f (Most likely referring to MACM/SeC6/c)	Object
2320	5967	Mr Dewi Griffiths	Dŵr Cymru/Welsh Water	MAC080	Comment

Respondent Number	Representation Number	Respondent Name	Organisation	MAC	Support / object / comment
2320	5968	Mr Dewi Griffiths	Dŵr Cymru/Welsh Water	MAC125	Comment
2320	5969	Mr Dewi Griffiths	Dŵr Cymru/Welsh Water	MAC126	Comment
5948	5970	Aled Francis		MACM/SeC6/f (Most likely referring to MACM/SeC6/c)	Object
4814	5971	Mr Richard Jones		MACM/SeC6/c	Object
4805	5972	Prof Bernard Twomey		MAC013	Object
5950	5973	Miss Bronwen Hill		MACM/SeC6/f (Most likely referring to MACM/SeC6/c)	Object
5950	5974	Miss Bronwen Hill		MACM/SeC6/b (Most likely referring to MACM/SeC6/c)	Object
5950	5975	Miss Bronwen Hill		MACM/SeC6/c	Object
5951	5976	Miss Sara Hill		MACM/SeC6/f (Most likely referring to MACM/SeC6/c)	Object
5952	5978	Mr Kallum Hayward		MACM/SeC6/f (Most likely referring to MACM/SeC6/c)	Object
5954	5979	Mirain Francis		MACM/SeC6/c	Object
5957	5980	Cerith Lewis		MACM/PrC3/d	Support
5955	5981	Benjamin Dicken		MACM/SeC6/c	Object
5958	5982	Adrian Pugh		MACM/PrC3/d	Support

Respondent Number	Representation Number	Respondent Name	Organisation	MAC	Support / object / comment
5959	5983	Ian Jones		MACM/SeC6/c	Object
2676	5984	Huw a Menna Watkins		MACM/SeC6/c	Object
5962	5985	Mike Mulroy		MACM/SeC6/c	Object
2770	5986	David T Davies		MACM/PrC2/b	Support
5963	5987	Huw Rees Davies		MACM/SeC6/c	Object
5964	5988	Lawri Powell		MACM/SeC6/c	Object
4810	5989	Gareth Thomas	Wales & West Housing	MAC024	Object
2320	5991	Dewi Griffiths	Dŵr Cymru / Welsh water	MAC036	Comment
2320	5992	Dewi Griffiths	Dŵr Cymru / Welsh water	MAC046	Comment
2320	5993	Dewi Griffiths	Dŵr Cymru / Welsh water	MAC080	Comment
2320	5994	Dewi Griffiths	Dŵr Cymru / Welsh water	MAC125	Comment
2320	5995	Dewi Griffiths	Dŵr Cymru / Welsh water	MAC126	Comment
3370	5996	Karen Burch		MAC045	Object
5966	5997	Steffan Beange		MACM/SeC6/c	Object
3410	5998	Kate Harrison	Persimmon Homes	MAC023	Object
3410	5999	Kate Harrison	Persimmon Homes	MAC057	Object

Respondent Number	Representation Number	Respondent Name	Organisation	MAC	Support / object / comment
3410	6000	Kate Harrison	Persimmon Homes	MAC013	Support
3410	6001	Kate Harrison	Persimmon Homes	MAC126	Support
3410	6002	Kate Harrison	Persimmon Homes	MACM/SeC6/c	Support
13	6003	Mark Newey	Welsh Government	General	Comment
5967	6004	Michael Davies		MACM/SeC6/c	Object
5968	6005	Mared Jones	Turley on behalf of Tata Steel	MACM/PrC2/a	Support
2699	6006	Dr Non Evans		MACM/SeC6/c	Object
3778	6007	Nick Horsley	Minerals Product Association	General	Comment
2703	6008	Lyndon Kervin		MACM/SeC6/f	Object
5969	6009	Sian Hinton		MACM/SeC6/c	Object
4665	6010	Craig Jones	JCR Planning	MAC080	Object
645	6011	Simon Barry	Boyer Planning	MAC012	Object
645	6012	Simon Barry	Boyer Planning	MAC013	Object
645	6013	Simon Barry	Boyer Planning	MACM/PrC2/c	Object
645	6014	Simon Barry	Boyer Planning	MAC122 Trajectory	Object
645	6015	Simon Barry	Boyer Planning	MAC126	Object
645	6016	Simon Barry	Boyer Planning	MAC010	Object
645	6017	Simon Barry	Boyer Planning	MAC036	Comment
645	6018	Simon Barry	Boyer Planning	MAC046	Comment

Respondent Number	Representation Number	Respondent Name	Organisation	MAC	Support / object / comment
645	6019	Simon Barry	Boyer Planning	MAC054	Comment
645	6020	Simon Barry	Boyer Planning	MAC057	Object
645	6021	Simon Barry	Boyer Planning	MAC085	Object
645	6022	Simon Barry	Boyer Planning	MAC080	Comment
2315	6023	Louise Edwards	Natural Resources Wales	MAC080	Support
2315	6024	Louise Edwards	Natural Resources Wales	MAC080	Support
2315	6025	Louise Edwards	Natural Resources Wales	MAC080	Object
38	6026	Laugharne Township Community Council		MAC007	Object
2315	6027	Louise Edwards	Natural Resources Wales	MAC080	Object
2315	6028	Louise Edwards	Natural Resources Wales	MAC080	Object
2379	6029	Mike Pugh		MACM/SeC6/c	Object
5972	6030	Paul Williams	Hywel Dda University Health Board	MAC001	Comment
2315	6031	Louise Edwards	Natural Resources Wales	MAC080	Object
2315	6032	Louise Edwards	Natural Resources Wales	MAC080	Object
2315	6033	Louise Edwards	Natural Resources Wales	MAC080	Object
2315	6034	Louise Edwards	Natural Resources Wales	MAC080	Object
2315	6035	Louise Edwards	Natural Resources Wales	MAC080	Object
2315	6036	Louise Edwards	Natural Resources Wales	MAC080	Object
2315	6037	Louise Edwards	Natural Resources Wales	MAC080	Object
2315	6038	Louise Edwards	Natural Resources Wales	MAC080	Object
5973	6039	Owain Enoch	Swansea Council	MAC036	Object
5973	6040	Owain Enoch	Swansea Council	MAC036	Object
5973	6041	Owain Enoch	Swansea Council	MAC036	Object

Respondent Number	Representation Number	Respondent Name	Organisation	MAC	Support / object / comment
2315	6042	Louise Edwards	Natural Resources Wales	MAC080	Object
5973	6043	Owain Enoch	Swansea Council	MAC036	Object
5973	6044	Owain Enoch	Swansea Council	MAC036	Object
2315	6045	Louise Edwards	Natural Resources Wales	MAC080	Object
5973	6046	Owain Enoch	Swansea Council	MAC036	Comment
5973	6047	Owain Enoch	Swansea Council	MAC036	Comment
2315	6048	Louise Edwards	Natural Resources Wales	MAC036	Object
2315	6049	Louise Edwards	Natural Resources Wales	MAC080	Object
2315	6050	Louise Edwards	Natural Resources Wales	MAC067	Object
2315	6051	Louise Edwards	Natural Resources Wales	MAC121	Object
2315	6052	Louise Edwards	Natural Resources Wales	MAC045	Object
2315	6053	Louise Edwards	Natural Resources Wales	MAC076	Object
2315	6054	Louise Edwards	Natural Resources Wales	MAC013	Support
5948	6055	Aled Francis		MACM/SeC6/c	Object
2315	6056	Louise Edwards	Natural Resources Wales	MAC033	Support
2315	6057	Louise Edwards	Natural Resources Wales	MAC037	Support
2315	6058	Louise Edwards	Natural Resources Wales	MAC065	Support
2315	6059	Louise Edwards	Natural Resources Wales	MAC066	Support
2315	6060	Louise Edwards	Natural Resources Wales	MAC069	Support
2315	6061	Louise Edwards	Natural Resources Wales	MAC070	Support
2315	6062	Louise Edwards	Natural Resources Wales	MAC071	Support
2315	6063	Louise Edwards	Natural Resources Wales	MAC075	Support
2315	6064	Louise Edwards	Natural Resources Wales	MAC081	Support
2315	6065	Louise Edwards	Natural Resources Wales	MAC083	Support

Respondent Number	Representation Number	Respondent Name	Organisation	MAC	Support / object / comment
2315	6066	Louise Edwards	Natural Resources Wales	MAC087	Support
2315	6067	Louise Edwards	Natural Resources Wales	MAC090	Support
2315	6068	Louise Edwards	Natural Resources Wales	MAC091	Support
2315	6069	Louise Edwards	Natural Resources Wales	MAC110	Support
2315	6070	Louise Edwards	Natural Resources Wales	MAC112	Support
2315	6071	Louise Edwards	Natural Resources Wales	MAC116	Support
2315	6072	Louise Edwards	Natural Resources Wales	MAC125	Support
5251	6073	Dylan Bryn Roberts	Dyfodol i'r laith	MAC004	Object
5251	6074	Dylan Bryn Roberts	Dyfodol i'r laith	MAC005	Object
5251	6075	Dylan Bryn Roberts	Dyfodol i'r laith	MAC013	Object
5251	6076	Dylan Bryn Roberts	Dyfodol i'r laith	MAC022	Object
5251	6077	Dylan Bryn Roberts	Dyfodol i'r laith	MAC023	Object
5251	6078	Dylan Bryn Roberts	Dyfodol i'r laith	MAC024	Object
5251	6079	Dylan Bryn Roberts	Dyfodol i'r laith	MAC031	Object
5251	6080	Dylan Bryn Roberts	Dyfodol i'r laith	MAC032	Object
5251	6081	Dylan Bryn Roberts	Dyfodol i'r laith	MAC043	Object
5251	6082	Dylan Bryn Roberts	Dyfodol i'r laith	MAC052	Object
619	6083	Mair Evans	Mudiad Amddiffyn Porthyrhyd	MAC057	Object
65	6084	Llanllawddog Community Council		MAC013	Comment
65	6085	Llanllawddog Community Council		MAC126	Support

Respondent Number	Representation Number	Respondent Name	Organisation	MAC	Support / object / comment
65	6086	Llanllawddog Community Council		MAC033	Support

4. MAC Representations Received and the Council's Responses

The Report sets out a summary of each duly made representation and the Council's response to it. It is in Plan order of the MAC content. Representations are either dealt with individually or where they have a common theme, they are grouped together.

For each section of the Plan (whether a representation has been grouped, or is dealt with individually), the Structure is as follows:

Section Comments Relate to

Summary of representations
Summary of representation changes to plan
Response
Action

Object / Support
(This section can either be a summary and response to a group of representations, or an individual representation.)

Representation number
Respondent
Summary
Change Suggested by respondent
Attachments

Object / Support
(This section is an individual representation)

Where a respondent has provided a summary, these are reflected in the "Summary" section. Where no summary has been provided, the Council has summarised the response. The Council's response to a representation / group of representations is set out in the "Response" section, along with any action to be taken.

MAC 001

Comment

Summary of representations:

Confirms that Welsh Government does not object to any MACs.

Summary of representation changes to plan:

No change to the Plan

Response:

Comments noted.

Action:

None

6003

Comment

Document Element: MAC 001

Respondent: Welsh Government

Summary:

I wish to confirm that I have read the Matters Arising Changes (MACs) proposed for Carmarthenshire's Replacement Local Development Plan (RLDP) and discussed these with colleagues at the Council.

I can confirm that the Welsh Government does not object to any of the MACs.

Change suggested by respondent:

No change to the Plan

Attachments:

Cover email and response - <https://carmarthenshire.oc2.uk/a/6z9>

Comment

Summary of representations:

Hywel Dda University Health Board broadly supports the direction of the LDP Matters Arising Changes, subject to continued engagement and consideration of healthcare impacts.

We look forward to working with Carmarthenshire County Council to ensure that:

- Growth is supported by appropriate healthcare infrastructure
- Planning decisions contribute positively to population health
- Communities are designed to enable healthier lives
- Transport connectivity supports equitable access to services from across West Wales

Summary of representation changes to plan:

No change to the Plan

Response:

Comments welcomed. The Council will continue to work with partners in considering healthcare impacts and planning.

Action:

No change to the Plan

6030

Comment

Document Element: MAC 001**Respondent:** Mr Paul Williams**Summary:**

Hywel Dda University Health Board broadly supports the direction of the LDP Matters Arising Changes, subject to continued engagement and consideration of healthcare impacts.

We look forward to working with Carmarthenshire County Council to ensure that:

- Growth is supported by appropriate healthcare infrastructure
- Planning decisions contribute positively to population health
- Communities are designed to enable healthier lives
- Transport connectivity supports equitable access to services from across West Wales

Change suggested by respondent:

No change to the Plan

Attachments:

Email representation redacted - <https://carmarthenshire.oc2.uk/a/6mt>

MAC 004

Object

Summary of representations:

Yn awgrymu lleihau y nifer o dai sydd wedi ei dyrannu yn y Cynllun.

Suggests that the number of dwellings allocated in the Plan is reduced.

Summary of representation changes to plan:

Lleihau y nifer o dai sydd wedi ei dyrannu yn y Cynllun.

Reduce the number of dwellings allocated in the Plan.

Response:

Mae'r strategaeth twf ac angen tai y Sir wedi eu hystyried a'r ffigur tai wedi ei nodi yn y Cynllun wedi ei danseilio gan dystiolaeth.

The Plan's growth strategy and the County's housing need has been considered and the housing figure identified in the Plan is underpinned by evidence.

Action:

Dim newid i'r Cynllun.

No change to the plan.

6073

Object

Document Element: MAC 004**Respondent:** Dyfodol i'r Iaith Cyf**Summary:**

Polisi Strategol – SP1: Twf Strategol

“Bydd y CDLI yn darparu ar gyfer twf economi gynaliadwy a gofynion tai yn y dyfodol drwy ddarparu 9,814 o dai newydd i fodloni'r gofyniad tai a nodwyd o 8,822.”

Rydym yn gwrthwynebu adeiladu 9,814 o dai newydd yn y sir ac yn grediniol bod angen adeiladu tai ar gyfer y galw presennol yn y sir a thwf rhag dybiedig yn y boblogaeth sirol yn unig.

Strategic Policy – SP1: Strategic Growth

“The LDP will provide for the future growth of a sustainable economy and housing requirement through the provision of 9,814 new homes to meet the identified housing requirement of 8,822.”

We oppose the construction of 9,814 new homes in the county and believe that housing needs to be built for the current demand in the county and solely for the anticipated growth in the county's population.

Change suggested by respondent:

Lleihau nifer o dai yn y Cynllun

Reduce the number of houses in the Plan

Attachments:Full representation - Welsh - <https://carmarthenshire.oc2.uk/a/6kh>Translation of Comments - <https://carmarthenshire.oc2.uk/a/6kj>email cover redacted - <https://carmarthenshire.oc2.uk/a/6md>**MAC 005**

Object

Summary of representations:

Wrth gyfeirio at safle PrC1/MU1 - Gorllewin Caerfyrddin, Caerfyrddin mae'n nodi y dylid ymrwymo o'r cychwyn cyntaf i glustnodi pob ysgol newydd yn y sir fel rhai cyfrwng Cymraeg.

When referring to PrC1/MU1 - West Carmarthen, Carmarthen they noted that a commitment should be given from the beginning to earmark every new school in the county as Welsh medium ones.

Summary of representation changes to plan:

Nodi y dylai pob ysgol newydd yn y sir fod yn un cyfrwng Cymraeg.

Notes that every new school in the county should be Welsh medium.

Response:

Byddai'n dod y tu allan i gylch gwaith y Cynllun.

It would fall outside the Plan's remit

Action:

Dim newid i'r Cynllun

No change to the Plan

6074

Object

Document Element: MAC 005

Respondent: Dyfodol i'r Iaith Cyf

Summary:

Dylid ymrwymo o'r cychwyn cyntaf i glustnodi pob ysgol newydd yn y sir fel rhai cyfrwng Cymraeg er mwyn cyfrannu at wireddu strategaeth Cymraeg 2050 Llywodraeth Cymru ac yn sgil y dirywiad ieithyddol enbyd a welwyd yn y sir dros yr ugain mlynedd olaf.

A commitment should be made from the outset to identify all new schools in the county as Welsh-medium in order to contribute to making the Welsh Government's Cymraeg 2050 strategy a reality and in light of the severe linguistic decline seen in the county over the last twenty years.

Change suggested by respondent:

Cynnwys ymrwymiad i glustnodi'r ysgol newydd fel un cyfrwng cymraeg.

Include a commitment to earmark the new school as a welsh medium school.

Attachments:

Full representation - Welsh - <https://carmarthenshire.oc2.uk/a/6kh>

Translation of Comments - <https://carmarthenshire.oc2.uk/a/6kj>

email cover redacted - <https://carmarthenshire.oc2.uk/a/6md>

MAC 007

Object

Summary of representations:

Objects to MAC 007 as it does not include Laugharne within the Retail hierarchy in Policy SP2. The Respondent requests that the settlement and town-centre hierarchy within the Local Development Plan is reviewed to ensure that Laugharne is afforded appropriate recognition and policy support as a town centre serving both residents and visitors.

Summary of representation changes to plan:

Include Laugharne within the retail hierarchy in Policy SP2

Response:

MAC 007 does not propose any amendments to the retail hierarchy.

The review of town centres and identification of retail hierarchy took into consideration the existing retail offer and scale of each centre. The Carmarthenshire Retail Study Update (2023) reviewed the hierarchy identified in the Second Deposit revised LDP and did not suggest amendments to the hierarchy and Laugharne was not recommended for inclusion. The Respondent outlines plans for growth in Laugharne, particularly centred around tourism and visitor accommodation. Whilst Laugharne is not recognised as a retail centre within the retail hierarchy, this does not prevent the town's growth nor the development of services and facilities to support additional visitors to the town which can be considered through the Plan's other policies.

Action:

No change to the Plan

6026**Object**

Document Element: MAC 007

Respondent: Laugharne Town Council

Summary:

Laugharne Township Community Council welcomes the opportunity to comment on the Revised Carmarthenshire Local Development Plan.

The Community Council wishes to express its concern that Laugharne's role as a retail and service centre is not sufficiently recognised within the settlement and town-centre hierarchy of the Local Development Plan.

Laugharne is one of Carmarthenshire's historic towns and is recognised by Carmarthenshire County Council as one of the County's Ten Towns. It possesses a distinctive town centre which provides a range of retail, hospitality, tourism and community services that support both local residents and visitors throughout the year. The town serves not only its resident population but also a wider rural hinterland and a substantial seasonal visitor economy which is growing year-on-year. There is substantial planned growth in visitor accommodation including Dylan Thomas resort, Tipis and further holiday lets to be realised over the coming year or two. There is a Nationally renowned Literary and Arts Festival: The Laugharne Weekend where large numbers of visitors attend.

The Community Council considers that the current planning framework places significant emphasis on Laugharne's heritage and tourism functions, while giving insufficient weight to its continuing role as a centre for local shopping, independent businesses, hospitality enterprises and community facilities. The vitality and viability of these businesses are essential to the sustainability of the town and contribute significantly to the local economy.

We respectfully request that the Council review the settlement and town-centre hierarchy within the Local Development Plan to ensure that Laugharne is afforded appropriate recognition and policy support as a town centre serving both residents and visitors

We therefore request that the Local Development Plan:

- Formally recognises Laugharne's role as an important local retail and service centre within the County's settlement hierarchy.
- Acknowledges the contribution made by the town's independent businesses, shops, hospitality venues and community services to the economic and social wellbeing of the area.
- Supports policies that protect and enhance the vitality and viability of Laugharne as a town centre.
- Ensures that future planning decisions take account of the need to sustain and strengthen the retail function of the town alongside its heritage and tourism role.
- Recognises that a thriving town centre is essential to maintaining Laugharne's character, which will subsequently support local employment opportunities and reduce the need for residents and visitors to travel elsewhere for goods and services.

The Community Council believes that greater recognition of Laugharne's retail and service-centre function would better reflect the town's historic status, its importance within the Ten Towns programme, and its ongoing contribution to the economy and community life of Carmarthenshire

Change suggested by respondent:

Amend the Plan

Attachments:

Cover email - <https://carmarthenshire.oc2.uk/a/6zq>

Representation letter redacted - <https://carmarthenshire.oc2.uk/a/6mr>

MAC 010**Comment**

Summary of representations:

The scale of this proposal is considered to be an overdevelopment of the area and will have a detrimental impact to the semi-rural nature of the surrounding area of Fforest as well as impacting ecological diversity.

Summary of representation changes to plan:

We request a reduction in scale of the proposals and introduction of a 5m buffer strip to act as a wildlife corridor and mitigate against habitat loss.

Response:

This representation is not duly made as the respondent refers to a housing allocation that is not the subject of a MAC. Reference is made to the list of not duly made representations.

Action:

No change to Plan.

5977**Comment**

Document Element: MAC 010

Respondent: Mr Chris Davies

Summary:

We consider the scale of this proposal to be an overdevelopment of the area and believe it will have a detrimental impact to the semi-rural nature of the surrounding area of Fforest as well as impacting ecological diversity. We request a reduction in scale and introduction of a 5m buffer strip to act as a wildlife corridor and mitigate against habitat loss, inline with Deposit Draft Policies PSD3 and PSD4 (both of which we fully support) as well as the The Wellbeing of Future Generations (Wales) Act 2015 and Environment (Wales) Act 2016.

Change suggested by respondent:

-

Attachments: None

Object

Summary of representations:

The respondent strongly believe that the proposed allocation at Land off Heol y Mynydd, Bryn should be extended to account for the site in its entirety. This would require a corresponding amendment to the development limits to include the full 5.4 hectares of land under Barratt Redrow's control, thereby avoiding any potential reliance upon the adjoining parcel of undeliverable white land to contribute to future housing supply.

Reference is drawn to the area of unallocated "white land" immediately to the south of the proposed allocation (also accessed from Heol y Mynydd, Bryn) and would, by default, be incorporated within the settlement boundary. In procedural terms, the inclusion of this land within the development limits creates the potential for it to come forward as a windfall site during the plan period. However, the land is understood to be landlocked, unregistered in terms of ownership and, as such, cannot presently be considered deliverable or developable.

In addition to the above, there appears to be some technical inconsistencies relating to site reference numbers and the physical extent of the development limits shown within the current Matters Arising Consultation document.

Summary of representation changes to plan:

Include an additional parcel of land within the development limits and to be allocated within Bryn to accommodate further development promoted by the respondent. Reference is drawn to the full representation made relating to the proposed allocated site and the increase in housing numbers.

Response:

Noted. The site in question is included within the development limits as 'white land' with no designated proposed uses. Whilst it is noted that there would be potential for the site to be brought forward for potential development this would only be possible subject to access, amenity and infrastructural constraints being overcome. Consequently the site makes no contributions towards the Council's housing supply.

The potential for misinterpretation to site reference is noted, however these site references were only to the MAC consultation and a final adopted Revised LDP will contain a separate / new site reference for the new allocated site, therefore removing any potential confusion that may have occurred.

Action:

No change to the Plan

6016

Object

Document Element: MAC 010

Respondent: Ms Zoe Aubery

Agent: Boyer Planning

Summary:

As part of the Matter Arising Changes (MACs), it is understood that an additional paragraph has been inserted explaining that: "Development limits are a key mechanism for helping to manage future growth by defining the area within which development would normally be permitted, subject to material planning considerations. The development limits have been applied to the Principal Centres, Service Centres and Sustainable Villages as defined in Strategic Policy SP3: Sustainable Distribution – Settlement Framework."

Barratt Redrow supports the principle of amending the settlement boundary but maintain that the proposed changes should be further revised to ensure a sustainable pattern of growth is achieved at Bryn. In turn this approach will better contribute towards meeting identified housing needs, including the provision of homes for local people in an accessible and sustainable location. For the purposes of soundness, BR strongly believe that the proposed allocation at Land off Heol y Mynydd, Bryn should be extended to account for the site in its entirety. This would require a

corresponding amendment to the development limits to include the full 5.4 hectares of land under Barratt Redrow's control, thereby avoiding any potential reliance upon the adjoining parcel of undeliverable white land to contribute to future housing supply.

By contrast Barratt Redrow notes that, as a consequence of the revised development limits, an area of unallocated "white land" immediately to the south of the proposed allocation (also accessed from Heol y Mynydd, Bryn) would, by default, be incorporated within the settlement boundary. In procedural terms, the inclusion of this land within the development limits creates the potential for it to come forward as a windfall site during the plan period. However, the land is understood to be landlocked, unregistered in terms of ownership and, as such, cannot presently be considered deliverable or developable.

Barratt Redrow therefore requests that the additional land, directly to the west of the allocation, which has continuously been promoted for residential development should be incorporated within the allocation boundary. The land is available, within the control of the developer, and capable of being delivered during the early years of the Plan period. Moreover, its inclusion would provide greater certainty that future residential development in this location will be delivered in a more comprehensively, coherent and ultimately sustainable manner. Thereby avoiding piecemeal or speculative proposals coming forward on adjacent land. This approach would be more closely aligned with national policy and in particular WG's principles of good placemaking in order to contribute towards achieving sustainable development in accordance with Test 2 of the DPM.

In addition to the above, there appears to be some technical inconsistencies relating to site reference numbers and the physical extent of the development limits shown within the current Matters Arising Consultation document. Firstly, the settlement boundary illustrated within the PDF version of the Matter Arising Changes documents (Figure 3) appears to be at odds with the boundary presented within the Council's interactive online mapping (Figure 2). As mentioned above whilst we understand that the intension is to amend the development limits of Bryn to incorporate Phase 1 of the site known as 'Land off Heol y Mynydd, Bryn' and, by virtue of which the unregistered parcel of white land located immediately to the south (BR maintains concerns regarding this approach). Currently there are discrepancies between the two plans which creates uncertainty as to the physical extent of the defined urban area and in turn adds an unnecessary layer of complication when interpreting the proposed changes. It is therefore essential that the Council clarifies the proposed arrangements on the PDF version (Figure 3) and rectifies any inconsistencies to ensure that all interested parties are able to make informed decisions based on an accurate and robust evidence base.

Secondly, there also appear to be inconsistencies in the allocation reference numbers relating to Land off Heol y Mynydd, Bryn. Throughout the Revised LDP, the allocation is generally referred to as PrC2/(V). However, within the Matter Arising Changes documentation, the site is identified as (MACM)PrC2/c, with the land to the south-east of Land off Heol y Mynydd, Bryn is allocated as (MACM)PrC2/v. Similar to the above these inconsistencies create ambiguity and have the potential to undermine effective interpretation and implementation of the Plan.

For completeness it is important that both of these matters are rectified for the purposes of accuracy/ transparency, and that the Revised LDP and all associated documentation consistently reflect the Council's intended position. Notwithstanding Barratt Redrow's continuing concerns regarding the appropriateness of extending the settlement boundary to include the unregistered parcel of white land, priority should instead be given to extending the proposed allocation at Heol y Mynydd, Bryn so as to provide a more coherent and defensible settlement edge.

Change suggested by respondent:

Amend the plan

Attachments:

Cover email - <https://carmarthenshire.oc2.uk/a/6zn>

Representation form - <https://carmarthenshire.oc2.uk/a/6zy>

Full representation form - <https://carmarthenshire.oc2.uk/a/6zp>

Object

Summary of representations:

Additional housing through the allocation of the respondent's whole site would increase the housing supply and the flexibility of the Plan.

Please see the respondent's full summary below.

Summary of representation changes to plan:

Increase the housing supply by the introduction of a larger site which in turn increases the flexibility of the housing supply.

Response:

The Council considers sufficient flexibility within its housing supply. This has been subject to detailed consideration through the examination process and the current 11.24% being considered an appropriate flexibility

Action:

No change to the Plan.

6011**Object**

Document Element: MAC 012

Respondent: Ms Zoe Aubery

Agent: Boyer Planning

Summary:

Strategic Policy SP4 sets out the Council's overall housing requirement of 8,822 homes for the plan period (2018-2033), and to achieve it makes provision for up to 9,814 new homes. Whilst BR fully support the principle of increasing the Council's overall housing target. It is important to note that in reality the proposed increase only equates to a provision of 110no. new dwellings over the emerging plan period, and therefore is minimal in nature.

Although we appreciate that in turn the proposed amendments lead to an increase in CCC's flexible allowance bring it up to circa 11.24%. BR maintain there are sufficient circumstances to warrant increasing both the proposed housing figure and associated flexible allowance further in order to provide greater certainty that emerging RLDP is capable of meet housing across Carmarthenshire. This is particular important to ensure sufficient flexibility is built into the plan itself from the outset. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.

In terms of the proposed flexibility allowance, whilst we acknowledge the latest figure of 11.24% technically exceeds the 10% threshold commonly referenced in the plan-making process.

Paragraph 5.59 of the DPM clearly states that "The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility with any variation robustly evidenced".

Having reviewed the technical evidence base we understand the current housing figures have been informed by the trends set out within the 2018-based demographic projections. Although we appreciate that more recent data has emerged following consultation on the additional sites towards the end of last year. From a procedural perspective it is important to recognise that the 2018-based projections have now been formally superseded by more recent findings which includes Welsh Government's 2022-Based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).

Given the emerging RLDP is at an advanced stage of the plan-making process we would not necessarily expect the Council to formally reassess its housing need position. However, in the interests of soundness, we strongly believe the Council's housing target, and by virtue of which flexible allowance, should be uplifted to better align with the latest demographic evidence available. Most notably this includes the fact that in the case of Carmarthenshire, from mid-2022 to mid-2032 the overall number of households is projected to increases by around 7%, which is broadly in line with the national average.

In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone.

The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are better reflected within the emerging RLDP's overall housing requirement. This is fundamental to ensure the emerging RLDP is locally specific and thus supported by a robust, proportionate and credible evidence to demonstrate compliance with Test 2 of the DPM.

Change suggested by respondent:

Amend the plan

Attachments:

Cover email - <https://carmarthenshire.oc2.uk/a/6zn>

Representation form - <https://carmarthenshire.oc2.uk/a/6zy>

Full representation form - <https://carmarthenshire.oc2.uk/a/6zp>

Object

Summary of representations:

Defnyddio targed tai fforddiadwy cyson ar draws pob safle. Newid canran o dai fforddiadwy gan ddefnyddio canran o 50% fel isafswm

Apply a consistent affordable housing target across all sites. Amend the affordable housing percentage by utilising a 50% target as a minimum

Summary of representation changes to plan:

Newid y canran dapariaeth tai fforddiadwy i 50%.

Change the affordable housing provision percentage to 50%.

Response:

Mae Polisi AHOM1 yn nodi'r canrannau gofynnol. Mae'r gofynion yma wedi eu tansellio gan dystiolaeth gadarn sydd wedi bod yn destun archwiliad.

Policy AHOM1 notes the required percentages. These requirements are underpinned by robust evidence which has been subject to examination.

Action:

Dim newid i'r Cynllun

No change to the Plan

6075

Object

Document Element: MAC 013

Respondent: Dyfodol i'r Iaith Cyf

Summary:

Dyma enghreifftiau isod ond mae'n pwynt yn un cyffredinol ar gyfer pob clwstwr yn y CDU cyfan.

- ☒ PrC1/h4 Tir oddi ar Barc y Delyn 17 1.7 Blwyddyn 11-15
- ☒ PrC1/h5 I'r dwyrain o Lôn Devereaux 10 1 Blwyddyn 6-10
- ☒ PrC1/h10 Brynhyfryd 20 2.4 Blwyddyn 6-10
- ☒ PrC1/h12 Heol Castell Pigyn, Abergwili ☒ 35 4.2 Blwyddyn 6-10 Blwyddyn 11-15
- ☒ PrC1/MU1 Gorllewin Caerfyrddin ☒ 222 26.64 Blwyddyn 1-5 Blwyddyn 6-10
- ☒ PrC1/MU2 Pibwr-lwyd 247 61.75 Blwyddyn 11-15
- ☒ PrC1/(iv) Tir oddi ar Heol Trefechan 30 3.6 Blwyddyn 11-16

Pam fod cyfradd yr unedau fforddiadwy yn amrywio o ddatblygiad i ddatblygiad? Onid oes angen yr un canran drwyddi draw? Credwn fod y canrannau presennol uchod yn annigonol ac yn methu a chyfrannu at lefydd yr argyfwng tai sy'n bodoli yn y sir ac yn genedlaethol. Rydym yn argymhell canran o 50% fel isafswm. Datblygiadau tai ar lefel fasnachol i ddatblygwyr yw'r rhelyw a fydd ar werth ar y farchnad agored ac yn denu mwy o brynwyr ariannog sydd ar gyfraddau cyflog y tu hwnt i fwyafrif trigolion y sir.

Here are examples below but it's a general point for all clusters in the entire LDP.

- PrC1/h4 – Land off Parc y Delyn 17 1.7 Years 11-15
- PrC1/h5 - East of Devereaux Drive 10 1 Years 6-10
- PrC1/h10 Brynhyfryd 20 2.4 Years 6-10
- PrC1/h12 Castell Pigyn Road, Abergwili ☒ 35 4.2 Years 6-10 Years 11-15
- PrC1/MU1 West Carmarthen ☒ 222 26.64 Years 1-5 Years 6-10
- PrC1/MU2 Pibwrlwyd 247 61.75 Years 11-15
- PrC1/(iv) – Land off Trevaughan Road 30 3.6 Years 11-16

Why does the rate of affordable units vary from development to development? Isn't the same percentage needed throughout? We believe that the current percentages above are insufficient and fail to contribute to the places with a housing crisis that exist in the county and nationally. We recommend a percentage of 50% as a minimum. Housing developments on a commercial level for developers are the remainder that will be for sale on the open market and attract more wealthy buyers who are on wage rates that are beyond the majority of the county's residents.

Change suggested by respondent:

Newid canran o dai fforddiadwy gan ddefnyddio canran o 50% fel isafswm

Amend the affordable housing percentage by utilising a 50% target as a minimum

Attachments:

Full representation - Welsh - <https://carmarthenshire.oc2.uk/a/6kh>

Translation of Comments - <https://carmarthenshire.oc2.uk/a/6kj>

email cover redacted - <https://carmarthenshire.oc2.uk/a/6md>

Support

Summary of representations:

■ Supports inclusion of annotation to identify the sites which have an element of flood risk

Summary of representation changes to plan:

■ No change to the Plan

Response:

■ Support welcomed.

Action:

■ No change to the Plan

6054**Support**

Document Element: MAC 013

Respondent: Natural Resources Wales

Summary:

■ We support the annotation to identify the sites which have an element of flood risk - AP2/4; AP15/7; AP6/21.

Change suggested by respondent:

■ No change to Plan.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

Support

Summary of representations:

■ The respondent supports the inclusion of SeC6 (iii) Land at Fforest Road and [as landowner / developer] state they they will deliver in line with the trajectory.

Summary of representation changes to plan:

■ No change to Plan.

Response:

■ Support welcomed.

Action:

■ No change to Plan.

6000

Support

Document Element: MAC 013

Respondent: Persimmon Homes West Wales

Summary:

Persimmon Homes supports the inclusion of SeC6 (iii) Land at Fforest Road and will deliver in line with the trajectory

Change suggested by respondent:

No change to the Plan

Attachments:

Cover email - <https://carmarthenshire.oc2.uk/a/6m6>

Representation form redacted - <https://carmarthenshire.oc2.uk/a/6m8>

Object

Summary of representations:

The respondent wholly supports the principle of proposed allocation at Heol y Mynydd, Bryn, it is noted that the Council has identified only the eastern portion of the site for 80 dwellings. Given the context the respondent strongly believes there is sufficient evidence to justify allocating the site in its entirety for up to 160 dwellings.

Summary of representation changes to plan:

Increase the size of the site from 80 dwellings to 160 dwellings.

Response:

The Council considers that the scale of the site, and in particular the housing numbers associated with the land has been subject to detailed consideration through the examination process and is consistent and appropriate to its location. Whilst the respondent points in relation to additional housing numbers and the resultant housing supply are noted, these matters have been fully considered through the examination and the current proposed allocation is considered sufficient and appropriate in this respect.

Action:

No change to the Plan.

6012

Object

Document Element: MAC 013

Respondent: Ms Zoe Aubery

Agent: Boyer Planning

Summary:

Whilst BR wholly support the principle of proposed allocation at Heol y Mynydd, Bryn, it is noted that the Council has identified only the eastern portion of the site for 80 dwellings. Given the context we strongly believe there is sufficient evidence to justify allocating the site in its entirety for up to 160 dwellings.

Site Allocation PrC2/(v)

BR appreciate the inclusion of Land at Heol y Mynydd, Bryn as a housing allocation within the Revised Carmarthenshire Local Development Plan for 80 units. However, it is still considered that the site is able to accommodate further development in order to maximise the opportunities to deliver homes in a highly sustainable location which in turn forms part of the Swansea Bay & Llanelli National Growth Area in line with Future Wales.

By virtue of the above Barratt Redrow suggest that the draft LDP policy for Heol y Mynydd, Bryn (PrC2/(v)) should be increased to 160 homes for the following reasons:

1. It would make efficient use of the site in accordance with national policy;
 2. The site is being promoted by a national housebuilder that is committed to delivering homes in the short-medium term – increasing the quantum of development on this allocation would ensure the draft RLDP delivers sufficient homes throughout the first part of the Plan period and maintains a more consistent supply of dwellings over the entire plan period.
 3. The site falls within Cluster 2: Llanelli and Southern Gwendraeth Area which has been identified as a 'national growth area' within Future Wales. To this end, with the potential for up to 160 dwellings to be delivered, this site is genuinely deliverable and can contribute to the identified housing need within the locality.
- Ultimately the proposed allocation of the site in its entirety would provide greater certainty in ensuring the emerging RLDP is able to effectively meet local housing need over the emerging plan period. Whilst also supporting a more consistent supply of homes in accordance with the Council's trajectory with sufficient contingency built-in to account for any unforeseen slippages elsewhere.

For completeness, if the Inspectors were minded to recommend allocating Heol y Mynydd for the full 160 homes and retaining all other proposed site allocations as currently drafted, this would only result in an increase to 1,072 homes (as opposed to 992 set out in MAC document) equating to a housing supply of 9,894 homes. With regards to the proposed flexible allowance such changes would result in a figure of 12.15% compared to 11.24% as currently mentioned within the RLDP MAC version.

Although we appreciate these amendments are relatively minor in terms of plan-making they remain in keeping with the context of Carmarthenshire whilst providing greater certainty that the emerging plan is capable of meeting the identified housing need over the plan period.

Change suggested by respondent:

Amend the plan

Attachments:

Cover email - <https://carmarthenshire.oc2.uk/a/6zn>

Representation form - <https://carmarthenshire.oc2.uk/a/6zy>

Full representation form - <https://carmarthenshire.oc2.uk/a/6zp>

Object

Summary of representations:

You need to demonstrate that an increase in housing has taken into consideration the capability of the schools, GP's, road safety and amenities are capable of dealing with an increase in people and cars. Our public transport system is sub-standard compared to cities such as Swansea and Cardiff.

Summary of representation changes to plan:

The plans should not go ahead unless there is an impact analysis carried out on schools, NHS services, Dentists and the increase in traffic through places such as Hendy. Air pollution through Hendy needs monitoring. Access to public transport, busses and trains need to be evaluated. to ensure our services are fit for purpose.

Response:

The Revised LDP has been subject to detailed assessments including the consideration of population and household projections. The Health Board and other statutory consultees, in addition to those within the local authority have been consulted as part of the preparatory process of the Plan. Furthermore significant evidence has been gathered as presented as part of our submission documents, and considered as part of the examination process.

The plan whilst responding to, and recognising infrastructure pressures also sets a long term vision and series of proposals which guide the location of future investments and growth.

Action:

No change to the Plan.

5972

Object

Document Element: MAC 013

Respondent: Prof Bernard Twomey

Summary:

You need to demonstrate that an increase in housing has taken into consideration the capability of the schools, GP's, road safety and amenities are capable of dealing with an increase in people and cars. Our public transport system is sub-standard compared to cities such as Swansea and Cardiff.

Change suggested by respondent:

The plans should not go ahead unless there is an impact analysis carried out on schools, NHS services, Dentists and the increase in traffic through places such as Hendy. Air pollution through Hendy needs monitoring. Access to public transport, busses and trains need to be evaluated. to ensure our services are fit for purpose. If you are making claims, please provide the evidence to support the claims.

Can the sewage systems cope - where is the evidence

Can the electrical network support an increase in electrical load - where is the evidence

Attachments: None

Comment

Summary of representations:

The Community Council is supportive that the continuation of the Clos y Fedw / Dan y Dderwen development has 3.7 affordable units earmarked. This is particularly important as there is a deficit of affordable housing within Rhydargaeau for young people who are local to the area to buy.

Summary of representation changes to plan:

No change to the Plan.

Response:

Comments Noted.

A part of the site has been developed with 2 affordable dwellings. The remainder of the site as highlighted within the HOM1 table identifies 17 dwellings remaining which would provide an indicative number of 1.7 affordable dwellings based on the affordable housing targets set out in Policy AHOM1.

Action:

No change to the Plan.

6084

Comment

Document Element: MAC 013

Respondent: Llanllawddog Community Council

Summary:

Within the Habitats Regulation Assessment the only specific site within Llanllawddog is at Cefn Farm, Rhydargaeau (reference SuV14/h1) relating to Matters Arising Change MAC 13 which describes that part of the site has been completed and that the element within the Deposit Revised LDP forms the remainder of the site. The Community Council is supportive that the continuation of the Clos y Fedw / Dan y Dderwen development has 3.7 affordable units earmarked. This is particularly important as there is a deficit of affordable housing within Rhydargaeau for young people who are local to the area to buy.

Change suggested by respondent:

No change to the Plan

Attachments:

Email Representation redacted - <https://carmarthenshire.oc2.uk/a/6mw>

MAC 022

Object

Summary of representations:

Newid Polisi SP5 i gynyddu'r darpariaeth o dai fforddiadwy trwy'r Cynllun.

Amend Policy SP5 to increase the provision of affordable housing through the Plan.

Summary of representation changes to plan:

Cynyddu'r nifer o dai fforddiadwy.

Increase the number of affordable homes.

Response:

Mae'r nifer o dai fforddiadwy sydd wedi ei nodi ym mholisi SP5 wedi ei hysbysu a thanseilio gan dystiolaeth gadarn ynghylch anghenion tai y sir ac eisoes wedi bod yn destun archwiliad.

The number of affordable homes identified in Policy SP5 is informed and underpinned by robust evidence relating to the county's housing need and has already been subject to examination.

Action:

Dim newid i'r Cynllun

No change to the Plan.

6076**Object**

Document Element: MAC 022

Respondent: Dyfodol i'r Iaith Cyf

Summary:

Polisi Strategol – SP 5: Strategaeth Tai Fforddiadwy Bydd y Cynllun yn sicrhau bod cymaint o dai fforddiadwy ag sy'n bosibl yn cael eu darparu hyd at 2033 drwy ddarparu targed isafswm o 2,111 1,900 o dai fforddiadwy. Bydd hyn o gymorth i ddatblygu a gwella cymunedau cynaliadwy a chytbwys.

Tra bo ni'n cefnogi cynllunio cynyddu yn y nifer o dai fforddiadwy o 1,900 i 2,111 nid yw hyn yn fawr o newid mewn gwirionedd. Credwn hefyd bod angen cyfradd sylweddol uwch o dai fforddiadwy a hynny ar sail methodoleg o niferoedd unigolion sydd ar restr aros y sir, stoc tai presennol sydd ar gael i'w rhentu a rhagdybiaeth o dwf yn y boblogaeth sirol dros y 15-20 mlynedd nesaf. Does dim amheuaeth na fydd y nifer presennol yn llwyddo o ran bod "...o gymorth i ddatblygu a gwella cymunedau cynaliadwy a chytbwys."

"Rhif paragraff newydd: Wrth gyfuno'r holl ddulliau o ran cyfraniadau tai fforddiadwy drwy'r system gynllunio, y targed a nodwyd ym Mholisi SP5 yw'r man cychwyn ar gyfer darparu Tai Fforddiadwy yn y sir, ac mae'r Cynllun yn ceisio sicrhau'r ddarpariaeth fwyaf posibl lle bo hynny'n berthnasol."

Strategic Policy – SP 5: Affordable Homes Strategy. The Plan will maximise the delivery of affordable homes up to 2033 through the provision of a minimum target of 2,111 1,900 affordable homes. This will support the development and enhancement of sustainable, balanced communities.

While we support planning to increase the number of affordable homes from 1,900 to 2,111, this is not really much of a change. We also believe that there is a need for a significantly higher rate of affordable housing based on a methodology of the county's waiting list numbers, the current housing stock available for rent and an assumption of growth in the county's population over the next 15-20 years. There's no doubt that the current number will not succeed "...to help develop and improve sustainable and balanced communities."

"New paragraph number: In combining all methods of affordable housing contributions through the planning system the target set out in Policy SP5 is the starting point for the provision of Affordable Housing within the county, with the Plan seeking to maximise the provision where applicable."

Change suggested by respondent:

Cynyddu y nifer o dai fforddiadwy

Increase the number of affordable housing

Attachments:

Full representation - Welsh - <https://carmarthenshire.oc2.uk/a/6kh>

Translation of Comments - <https://carmarthenshire.oc2.uk/a/6kj>

email cover redacted - <https://carmarthenshire.oc2.uk/a/6md>

Object

Summary of representations:

Yn nodi bod y canrannau presennol ym mholisi AHOM1 yn annigonol ac yn methu â chyfrannu at leddfu yr argyfwng tai sy'n bodoli yn y sir ac yn genedlaethol. Maent yn argymhell canran o 50% fel isafswm.

Indicates that the current percentages in the AHOM1 policy are insufficient and fail to contribute to easing the housing crisis that exists in the county and nationally. They recommend a percentage of 50% as a minimum.

Summary of representation changes to plan:

Cynyddu canran y tai fforddiadwy ym mholisi AHOM1 i o leiaf 50%.

Increase the affordable housing percentage in policy AHOM1 to at least 50%.

Response:

Mae'r canrannau presennol ym mholisi AHOM1 wedi ei seilio ar dystiolaeth gadarn.

The current percentages in Policy AHOM1 are based on robust evidence.

Action:

Dim newid i'r Cynllun

No change to the Plan.

6077**Object**

Document Element: MAC 023

Respondent: Dyfodol i'r Iaith Cyf

Summary:

Credwn fod y canrannau presennol uchod yn annigonol ac yn methu â chyfrannu at leddfu yr argyfwng tai sy'n bodoli yn y sir ac yn genedlaethol. Rydym yn argymhell canran o 50% fel isafswm.

Datblygiadau tai ar lefel fasnachol i ddatblygwyr yw'r rhelyw a fydd ar werth ar y farchnad agored ac yn denu mwy o brynwyr ariannog sydd ar gyfraddau cyflog y tu hwnt i fwyaf trigolion y sir.

Mewnllifiad o bobl di-Gymraeg fydd y rhelyw, yn ôl patrymau symudedd l'r sir. Bydd hyn yn cyfrannu at ddirywiad pellach y Gymraeg yn y sir sydd eisoes wedi gostwng i 39% lle roedd dros 50% ugain mlynedd ynghynt. Rhaid wrth fesurau mwy cadarn i atal dirywiad pellach, ceisio sefydlogi os nad atgyfodi'r canran o siaradwyr Cymraeg yn y sir yn unol a Cymraeg 2050. Meddai gwefan Atlas yr iaith Gymraeg wrth drafod cyfrifiad 2021 yn Sir Gaerfyrddin:

"Collwyd 5,200 o siaradwyr Cymraeg yn y sir rhwng 2011 a 2021, ar ôl colled debyg o 5,800 rhwng 2001 a 2011, sy'n golygu lleihad o 11,000 mewn 20 mlynedd.

Mae pob grwp oedran, ac eithrio pobl ifanc rhwng 25 a 34 yn dangos lleihad, gyda'r colledion mwyaf i'w gweld ymysg pobl rhwng 35 a 64 oed. Ymysg y grwpiau oedran hyn mae'r canrannau lleiaf yn y sir bellach, gydag ond tua thraean ohonynt yn gallu siarad Cymraeg. Mae'r gyfran sy'n gallu'r iaith yn codi ymysg y to hŷn, i 36.0 y cant o bobl rhwng 65 a 74 oed a 45.0 y cant ymhlith pobl dros 75."

We believe that the current percentages above are insufficient and fail to contribute to alleviating the housing crisis that exists in the county and nationally. We recommend a percentage of 50% as a minimum.

Housing developments on a commercial level for developers are the remainder that will be for sale on the open market and attract more wealthy buyers who are at wage rates that are beyond the majority of the county's residents.

An influx of non-Welsh speakers will be the remainder, according to the patterns of moving to the county. This will contribute to a further decline in the Welsh language in the county which has already fallen to 39% where it was over 50% twenty years earlier. More robust measures must be in place to prevent further decline and seek to stabilise and revive the percentage of Welsh speakers in the county in line with Cymraeg 2050. When discussing the 2021 census in Carmarthenshire, the website Atlas y Gymraeg said:

"5,200 Welsh speakers were lost in the county between 2011 and 2021, after a similar loss of 5,800 between 2001 and 2011, which represents a reduction of 11,000 in 20 years.

All age groups, with the exception of young people aged 25 to 34 are showing a reduction, with the biggest losses being seen among those aged 35 to 64. These age groups now have the smallest percentages in the county, with only about a third of them able to speak Welsh. The proportion of people who are able to speak the language is rising among the elderly, to 36.0 per cent of people aged 65 to 74 and 45.0 per cent among those over 75."

Change suggested by respondent:

Cynyddu y canran o dai fforddiadwy ym Mholisi AHOM1.

Increase the percentage of affordable housing in Policy AHOM1.

Attachments:

Full representation - Welsh - <https://carmarthenshire.oc2.uk/a/6kh>

Translation of Comments - <https://carmarthenshire.oc2.uk/a/6kj>

email cover redacted - <https://carmarthenshire.oc2.uk/a/6md>

Object

Summary of representations:

Objection to the removal from Policy AHOM1 of the reference to variation if there are impacts upon a proposal's financial viability. This objection is to ensure that schemes can remain deliverable if unforeseen circumstances arise which were not accounted for in the LDP Viability studies.

Summary of representation changes to plan:

Reinsertion of the deleted wording from this policy:

'Where the above requirements cannot be achieved due to their impacts upon a proposal's financial viability, a variation may be agreed on a case-by-case basis.'

Response:

Noted. Reference is made to the new paragraph set out within AHOM1 (MAC023) which makes provision for the affordable housing target percentage within the policy to be a target to be used as a starting point for affordable housing negotiations. Further clarity will be provided out within the Affordable Housing Supplementary Planning Guidance.

Action:

No action.

5998

Object

Document Element: MAC 023

Respondent: Persimmon Homes West Wales

Summary:

AHOM1: Provision of Affordable Homes

Object to the removal of the reference to variation if there are impacts upon a proposal's financial viability. This objection is to ensure that schemes can remain deliverable if unforeseen circumstances arise which were not accounted for in the LDP Viability studies. An example of this would be the impact of the current Nitrates position in the County. Note the reference in MAC033 INF1: Planning Obligations

Change suggested by respondent:

Reinsertion of wording referred to by respondent.

Attachments:

Cover email - <https://carmarthenshire.oc2.uk/a/6m6>

Representation form redacted - <https://carmarthenshire.oc2.uk/a/6m8>

Object

Summary of representations:

Objects to the removal of the reference to a variation if there are impacts upon a proposal's financial viability. By removing this wording, you are removing the clear statement that the requirement for affordable homes is flexible and can be negotiated where a reason based on viability can be shown.

Summary of representation changes to plan:

Reinstate the words 'Where the above requirements cannot be achieved due to their impacts upon a proposal's financial viability, a variation may be agreed on a case-by-case basis.'

If this is not acceptable, the wording should be included in the supporting text after the policy requirements.

Response:

Noted. Reference is made to the new paragraph set out within AHOM1 (MAC023) which makes provision for the affordable housing target percentage within the policy to be a target to be used as a starting point for affordable housing negotiations. Further clarity will be provided out within the Affordable Housing Supplementary Planning Guidance.

Action:

No action.

5960

Object

Document Element: MAC 023

Respondent: The Home Builders Federation

Summary:

HBF objects to the removal of the reference to a variation if there are impacts upon a proposal's financial viability. By removing this wording, you are removing the clear statement that the requirement for affordable homes is flexible and can be negotiated where a reason based on viability can be shown.

Not all potential costs have been accounted for in the high-level viability, which sets the affordable requirement percentages; an example of this would be the impact of the current Nitrates position in the County. Note the reference in MAC033 INF1: Planning Obligations

Change suggested by respondent:

Reinstate the words 'Where the above requirements cannot be achieved due to their impacts upon a proposal's financial viability, a variation may be agreed on a case-by-case basis.'

If this is not acceptable, the wording should be included in the supporting text after the policy requirements.

Attachments: None

MAC 024

Object

Summary of representations:

Newid ystyriaethau polisi gosod tai cymdeithasol er mwyn diogelu ac atgyfnerthu y iaith Gymraeg.

Change the considerations of the social housing letting policy to protect and strengthen the Welsh language.

Summary of representation changes to plan:

Newid ystyriaethau polisi gosod tai cymdeithasol er mwyn diogelu ac atgyfnerthu y iaith Gymraeg.

Change the considerations of the social housing letting policy to protect and strengthen the Welsh language.

Response:

Nodwyd. Mae hyn y tu hwnt i gylch gwaith y Cynllun.

Ni fyddai'n bosib cyflwyno'r newidiadu yma yn y Cynllun mewn modd sy'n cydymffurfio â pharagraff 3.28 o Bolisi Cynllunio Cymru sy'n nodi, 'Ni ddylai polisïau a phenderfyniadau gyflwyno unrhyw elfen o wahaniaethu rhwng unigolion yn seiliedig ar eu gallu ieithyddol, ac ni ddylent geisio rheoli deiliadaeth tai ar sail ieithyddol

Noted. This is beyond the remit of the Plan

It would not be possible to introduce these changes to the Plan in a manner that conforms with paragraph 3.28 of Planning Policy Wales, which notes 'Policies and decisions must not introduce any element of discrimination between individuals on the basis of their linguistic ability, and should not seek to control housing occupancy on linguistic grounds.

Action:

Dim newid i'r Cynllun.

No change to the Plan.

6078

Object

Document Element: MAC 024

Respondent: Dyfodol i'r iaith Cyf

Summary:

Rydym yn cefnogi'r paragraff newydd ond hefyd yn tynnu eich sylw at y sefyllfa ganlynol a nodir gan Jayne Bryant, cyn-Ysgrifennydd y Cabinet dros Lywodraeth Leol a Thai mewn gohebiaeth â ni dyddiedig 17eg Tachwedd 2025.

"yn ofynnol i awdurdodau lleol o dan adran 167 o Ddeddf Tai 1996 fod â chynllun dyrannu tai cymdeithasol ar gyfer pennu blaenoriaethau wrth ddyrannu tai cymdeithasol. Mae'r ddeddfwriaeth yn nodi'n glir bod 5 categori y dylid rhoi blaenoriaeth neu flaenoriaeth resymol iddynt wrth ddyrannu tai cymdeithasol, o fewn eu cynlluniau dyrannu tai cymdeithasol, er ei fod yn ôl disgrisiwn a dyluniad yr awdurdod lleol o ran sut mae'r grwpiau dewisol hynny'n cael eu trefnu neu eu blaenoriaethu o fewn eu cynlluniau unigol. Wrth benderfynu ar eu cynlluniau penodol, rhaid i bob awdurdod lleol yng Nghymru roi sylw i Gôd Canllawiau Llywodraeth Cymru ar gyfer Awdurdodau Lleol: Dyrannu Llety a Digartrefedd ynghyd â'u rhwymedigaethau statudol.

Fodd bynnag, ochr yn ochr â'u cynlluniau dyrannu ac mewn ymateb i anghenion lleol eu hardaloedd, gall awdurdodau lleol ystyried disgrifiadau penodol eraill o bobl y dylid dyrannu llety iddynt fel rhan o bolisi gosod lleol y gellir ei gynllunio i ddyrannu llety o fewn ardal benodol o'u hawdurdod lleol. Mae adran 167(2E) o Ddeddf 1996 yn caniatáu i awdurdodau lleol ddyrannu llety i bobl o ddisgrifiad penodol, a allai gynnwys gofynion iaith, p'un a ydynt yn dod o fewn y categorïau dewis rhesymol ai peidio, ar yr amod bod yr awdurdod lleol yn gallu sicrhau nad yw hyn yn dominyddu eu cynllun dyrannu, ac y dylid blaenoriaethu pobl gyffredinol sydd â ffafriaeth

resymol y mae gan yr awdurdod lleol ddyletswydd statudol drostynt dros y rhai nad oes ganddynt ddyletswydd drostynt.

Dylai'r polisïau gydymffurfio â gofynion adran 167 o Ddeddf Tai 1996 ac unrhyw ddyletswyddau statudol eraill, megis y rhai o dan y Ddeddf Cydraddoldeb. Rhaid i bolisïau o'r fath hefyd fod yn seiliedig ar dystiolaeth, asesu a monitro effaith cydraddoldeb i sicrhau eu bod yn cyflawni'r cynaliadwyedd cymunedol y bwriedir iddynt ei gyflawni."

Byddai mabwysiadu polisi ymarferol fel hyn yn gyfle euraidd i'r Cyngor Sir ddangos ymrwymiad clir a phendant o blaid ceisio diogelu ac atgyfnerthu'r iaith mewn sir sydd wedi gweld y dirywiad mwyaf mewn 20 mlynedd.

We support the new paragraph but also draw your attention to the following position set out by Jayne Bryant, former Cabinet Secretary for Local Government and Housing in correspondence with us dated the 17th of November 2025.

"local authorities under section 167 of the Housing Act 1996 are required to have a social housing allocation plan for setting priorities in the allocation of social housing. The legislation clearly sets out that there are 5 categories that should be given priority or reasonable priority while allocating social housing, within their social housing allocation plans, although it is at the discretion and design of the local authority as to how those discretionary groups are organised or prioritised within their individual plans. When deciding on their specific schemes, all local authorities in Wales must have regard to the Welsh Government's Code of Guidance for Local Authorities: Allocation of Accommodation and Homelessness along with their statutory obligations. However, alongside their allocation plans and in response to the local needs of their areas, local authorities may consider other specific descriptions of people to whom accommodation should be allocated as part of a local lettings policy that can be designed to allocate accommodation within a particular area of their local authority.

Section 167(2E) of the 1996 Act allows local authorities to allocate accommodation to people of a particular description, which may include language requirements, whether or not they fall within the reasonable preference categories, provided that the local authority is able to ensure that this does not dominate their allocation plan, and that preference should be given to ordinary people with a reasonable preference for whom the local authority has a statutory duty over those for whom they have no duty.

The policies should comply with the requirements of section 167 of the Housing Act 1996 and any other statutory duties, such as those under the Equality Act. Such policies must also be evidence-based, as well as assess and monitor the impact of equality to ensure they achieve the community sustainability they are intended to achieve."

Adopting a practical policy such as this would be a golden opportunity for the County Council to demonstrate a clear and firm commitment to seeking to protect and reinforce the language in a county that has seen the greatest decline in 20 years.

Change suggested by respondent:

Newid ystyriaethau polisi gosod tai cymdeithasol er mwyn diogelu ac atgyfnerthu y iaith Gymraeg.

Change the considerations of the social housing letting policy to protect and strengthen the Welsh language.

Attachments:

Full representation - Welsh - <https://carmarthenshire.oc2.uk/a/6kh>

Translation of Comments - <https://carmarthenshire.oc2.uk/a/6kj>

email cover redacted - <https://carmarthenshire.oc2.uk/a/6md>

Object

Summary of representations:

Requests wording change to Policy AHOM 2 - Amendments to policy AHOM2: Affordable Housing - Exceptions Sites as follows: All new affordable local need housing on exception sites will be restricted to those who can demonstrate they have a need to live in the Town or Cluster Area, as defined in policy SP3, within which the site is situated, and are in Affordable Housing Need. Reference is drawn to the Glossary of Terms which considers the Local Need Eligibility, and the criteria which must be satisfied to permit local need housing.

Summary of representation changes to plan:

Insertion of additional text

Response:

Noted. AHOM2 and its reasoned justification provides sufficient certainty and clarity in relation to the provision of exception sites and the local needs eligibility criteria as set out within the glossary of terms. In this respect, the provision for the reference to Town or Community Council area or the adjoining Town or Community Council area provides appropriate spatial flexibility in consideration to affordable housing exception sites as set out in AHOM2.

Action:

No change to the Plan

5989

Object

Document Element: MAC 024

Respondent: Wales & West Housing

Summary:

Proposes amendments to policy AHOM2: Affordable Housing - Exceptions Sites as follows: All new affordable local need housing on exception sites will be restricted to those who can demonstrate they have a need to live in the Town or Cluster Area, as defined in policy SP3, within which the site is situated, and are in Affordable Housing Need. Reference is drawn to the Glossary of Terms which considers the Local Need Eligibility, and the criteria which must be satisfied to permit local need housing.

The reasons for the suggested change are the wording of the paragraph is too geographically restrictive in its reference to community council area, and imprecise.

Change suggested by respondent:

Amend Policy AHOM2: Affordable Housing - Exceptions Sites.

Attachments:

New affordable local need housing - <https://carmarthenshire.oc2.uk/a/6z6>

MAC 031

Object

Summary of representations:

Newid y frawddeg gyntaf i egluro mae canran cenedlaethol yw 17.8%.

Dylid ystyried a ellir datblygu modelau, o ran gosod tai cymdeithasol neu wrth lunio cytundebau adran 106, lle gallai'r gymraeg fod yn ystyriaeth gadarnhaol, ochr-yn-ochr ag ystyriaethau eraill.

Amend the first sentence to explain that 17.8% is a national percentage.

Should consider whether models can be developed in terms of letting social housing, or when drafting S106 agreements, where the Welsh language could be a positive consideration, alongside other considerations

Summary of representation changes to plan:

Newid y frawddeg gyntaf i egluro mae canran cenedlaethol yw 17.8%.

Dylid ystyried a ellir datblygu modelau, o ran gosod tai cymdeithasol neu wrth lunio cytundebau adran 106, lle gallai'r gymraeg fod yn ystyriaeth gadarnhaol, ochr-yn-ochr ag ystyriaethau eraill.

Amend the first sentence to explain that 17.8% is a national percentage.

Should consider whether models can be developed in terms of letting social housing, or when drafting S106 agreements, where the Welsh language could be a positive consideration, alongside other considerations

Response:

Byddai nodi mai canran cenedlaethol yw 17.8% yn gwella eglurder y Cynllun.

Byddai ymgorffori gallu ieithyddol fel ystyriaeth mewn polisi gosod tai cymdeithasol yn anghydnaws â pharagraff 3.28 o Bolisi Cynllunio Cymru, sy'n nodi 'Ni ddylai polisiâu a phenderfyniadau gyflwyno unrhyw elfen o wahaniaethu rhwng unigolion yn seiliedig ar eu gallu ieithyddol, ac ni ddylent geisio rheoli deiliadaeth tai ar sail ieithyddol.'

Noting that the national percentage is 17.8% would improve the clarity of the Plan.

Incorporating linguistic ability as a consideration into social housing lettings policy would be incompatible with paragraph 3.28 of Planning Policy Wales, which notes 'Policies and decisions must not introduce any element of discrimination between individuals on the basis of their linguistic ability, and should not seek to control housing occupancy on linguistic grounds.'

Action:

Awgrymu egluro bod 17.8% yn ymwneud â'r ffigur cyfartalog cenedlaethol.

Suggest clarifying that 17.8% relates to the national average figure.

6079

Object

Document Element: MAC 031

Respondent: Dyfodol i'r Iaith Cyf

Summary:

Rydym yn croesawu'r polisi a'r paragraff newydd canlynol

"Ystyrir Sir Gaerfyrddin yn ei chyfanrwydd yn ardal o sensitifrwydd ieithyddol. Mae Cyfrifiad 2021 yn dynodi bod 17.8% o'r boblogaeth yn gallu siarad Cymraeg, tra bod y ffigur cyfatebol ar gyfer Sir Gaerfyrddin yn 39.9%. O ran dadansoddiad daearyddol o gyfran y siaradwyr ledled y Sir, mae ar ei hisaf yn ward Tyisha lle mae 18.9% yn siarad Cymraeg, ac ar ei uchaf ym Mhontyberem lle mae 60.7% yn siarad Cymraeg. Mae cyfran y siaradwyr Cymraeg yn uwch na'r cyfartaledd cenedlaethol ar draws pob ward yn y Sir, ac am y rheswm hwn yn bennaf y mae Sir Gaerfyrddin yn ei chyfanrwydd yn cael ei hystyried yn sensitif yn ieithyddol. Hefyd, mae data'r Cyfrifiad diwethaf wedi dangos gostyngiad sylweddol yn nifer y siaradwyr Cymraeg ledled y Sir sy'n dangos natur fregus yr iaith yn Sir Gaerfyrddin." Ond mae angen esbonio ar gychwyn y frawddeg gyntaf mai 17.8% yw'r canran cenedlaethol sy'n gallu siarad Cymraeg gan nad yw hynny'n eglur. Mae'r frawddeg olaf yn cadarnhau ein sylwadau blaenorol a'r unig ffordd i daclo 'gostyngiad sylweddol' yw trwy gyfres o fesurau radical a phellgyrhaeddgar. Heb hynny, parhau i golli tir fydd hynt y Gymraeg yn sir Gâr.

Hefyd, mae'n debygol iawn y bydd Llywodraeth Cymru yn cefnogi a mabwysiadu argymhellion adroddiad Comisiwn Cymunedau Cymraeg ("Grymuso cymunedau, cryfhau'r Gymraeg") yn fuan sy'n cynnwys dynodi o arwyddocâd ieithyddol dwysedd uwch. Bydd hyn felly yn berthnasol iawn o fewn eich sir a adnabyddir fel un ardal ieithyddol sensitif yn barod. Hefyd mae angen cyfeirio at argymhelliad 33: Dylai awdurdodau lleol ac awdurdodau cynllunio ystyried a ellir datblygu modelau, o ran gosod tai cymdeithasol neu wrth lunio Cytundebau Adran 106, lle gallai'r Gymraeg fod yn un ystyriaeth gadarnhaol, ochr-yn-ochr ag ystyriaethau eraill. Dylid craffu ar unrhyw fodelau a ddatblygir er mwyn sicrhau nad oes anfantais annerbyniol i'r boblogaeth ddi-Gymraeg, ac i sicrhau cydymffurfiaeth â deddfwriaeth gydraddoldeb berthnasol.

We welcome the policy and the following new paragraph

"Carmarthenshire in its entirety is considered an area of linguistic sensitivity. The 2021 Census indicates that 17.8% of the population can speak Welsh, whilst the correlating figure for Carmarthenshire stands at 39.9%. In terms of the geographical breakdown of the proportion of speakers across the County, this is lowest in the Tyisha Ward where 18.9% speak Welsh, and highest in Pontyberem where 60.7% speak Welsh. The proportion of Welsh speakers is higher than the national average across each ward in the County, and it is largely for this reason Carmarthenshire in its entirety is considered to be linguistically sensitive. Additionally, the most recent Census data has shown a substantial decrease in the number of Welsh speakers across the County illustrating the language's vulnerability in Carmarthenshire."

But it needs to be explained at the beginning of the first sentence that the national percentage who can speak Welsh is 17.8% as that is not clear. The last sentence confirms our previous comments and the only way to tackle a 'significant decline' is through a series of radical and far-reaching measures. Without that, the future of the Welsh language in Carmarthenshire will continue to lose ground.

It is also very likely that the Welsh Government will soon support and adopt the recommendations of the Commission for Welsh-speaking Communities' report ("Empowering communities, strengthening the Welsh language") which includes designating areas of higher density linguistic significance. This will therefore be very relevant within your county which is already known as one linguistically sensitive area. Reference should also be made to recommendation 33: Local authorities and planning authorities should consider whether models can be developed, in terms of letting social housing or in compiling Section 106 Agreements, where the Welsh language could be one positive consideration, alongside other considerations. Any models developed should be scrutinised to ensure that there is no unacceptable disadvantage to the non-Welsh speaking population, and to ensure compliance with relevant equality legislation.

Change suggested by respondent:

Newid y frawddeg gyntaf i egluro mae canran cenedlaethol yw 17.8%

Dylid ystyried a ellir datblygu modelau, o ran gosod tai cymdeithasol neu wrth lunio cytundebau adran 106, lle gallai'r gymraeg fod yn ystyriaeth gadarnhaol, ochr-yn-ochr ag ystyriaethau eraill.

Amend the first sentence to explain that 17.8% is a national percentage.

Should consider whether models can be developed in terms of letting social housing, or by drafting S106 agreements, where the Welsh language could be a positive consideration, alongside other considerations

Attachments:

Full representation - Welsh - <https://carmarthenshire.oc2.uk/a/6kh>

Translation of Comments - <https://carmarthenshire.oc2.uk/a/6kj>

email cover redacted - <https://carmarthenshire.oc2.uk/a/6md>

MAC 032**Object****Summary of representations:**

Gwrthwynebu dileu testun a gwrthwynebu ychwanegu testun newydd fel y nodwyd yn MAC 032.

Objects to the deletion of text and objects to the addition of new text as noted in MAC 032.

Summary of representation changes to plan:

Cadw'r paragraff wedi'i ddileu. Dileu y paragraff newydd.

Retain the deleted paragraph. Delete the new paragraph.

Response:

Mae'r Polisi wedi bod yn destun y broses archwiliad. Mae'r gwelliannau hyn sydd wedi eu gosod trwy'r Newdidadau yn Sgil Materion a Godwyd yn sicrhau cadernid y Cynllun.

The Policy has been the subject to consideration through the examination process. The amendments set out through the MACs consequently ensure the Plan's soundness.

Action:

Dim newid i'r Cynllun.

No change to the Plan

6080**Object**

Document Element: MAC 032

Respondent: Dyfodol i'r Iaith Cyf

Summary:

Rydym yn gwrthwynebu'r paragraff newydd canlynol:

"Bydd yn ofynnol i gynigion ar gyfer datblygiadau tai ar raddfa fawr ar hap-safleoedd mawr, a fydd yn unigol neu gyda'i gilydd yn fwy na'r lwfans hap-safleoedd blynyddol o fewn y Cynllun, gyflwyno Asesiad o'r Effaith ar y Gymraeg a fydd yn nodi sut y bydd y datblygiad arfaethedig yn diogelu, yn hyrwyddo ac yn gwella'r Gymraeg."

Credwn bod nifer o ddatblygiadau tai ar raddfa fechan o'u cwmpasu gyda'i gilydd ar draws y sir yn creu clwstwr sy'n

debygol iawn o gael effaith ar iaith cymunedau'r sir, yn arbennig mewn cymunedau bychain gwledig lle mae dyfodiad 5 tŷ a 5 teulu newydd yn newid natur a gwead y gymuned honno. O gofio'r "gostyngiad sylweddol o ran yn nifer y siaradwyr Cymraeg ledled y Sir sy'n dangos natur fregus yr iaith yn Sir Gaerfyrddin" mae gwir angen cynnal asesiad o'r effaith ar y Gymraeg ar pob datblygiad tŷ newydd o 5 uned neu fwy.

Rydym yn gwrthwynebu dileu'r paragraff canlynol...

"11.181 Mae Strategaeth y Cynllun yn darparu ar gyfer twf organig ar raddfa fach o fewn y Pentrefi Gwledig ac mae polisiâu HOM1 a HOM3 yn adeiladu ar hyn gan ganiatáu datblygu ar raddfa briodol ac mewn lleoliadau priodol. Ystyrir bod datblygiad bob yn dipyn ar y raddfa hon yn gallu gwneud cyfraniad cadarnhaol tuag at dwf cynaliadwy'r Gymraeg mewn cymunedau gwledig, a bod unrhyw effeithiau negyddol yn debygol o gael eu hamsugno gan y gymuned. Efallai nad yw datblygiad nas rhagwelwyd ar raddfa sylweddol nas caniateir ym mhollisiau'r Cynllun yn gydnaws â Strategaeth y Cynllun, ac felly mae ei effeithiau heb eu hasesu ac yn anhysbys. Os caiff cynigion o'r fath eu cyflwyno i gael eu hystyried, bydd angen cyflwyno asesiad llawn gyda hwy sy'n nodi eu heffeithiau tebygol ar y Gymraeg." Mae hepgor y gofyniad yma yn gwanhau ymhellach y cyfres o fesurau i ddiogelu'r Gymraeg fel iaith fyw gymunedol ac ni chynigir unrhyw esboniad dros ei ddileu. Ond mae angen herio'r gosodiad yn y geiriad gan fod datblygiadau bob yn dipyn ar y raddfa hon hefyd yn gallu bod yn negyddol a does dim gwarant bod modd eu hamsugno gan y gymuned. Mae tystiolaeth y 3 cyfrifiad olaf yn cadarnhau hynny sy'n tanlinellu'r angen am gadw'r gofyniad yma yn y CDU. Fel arall mae'r gosodiad yn haerid goddrychol, dadlennol, di-sail ac anghywir.

Fel ag y saif ar hyn o bryd felly, nid yw Polisi Strategol – SP 8: Y Gymraeg a Diwylliant Cymru yn ddigonol na digon cadarn i wrthsefyll effaith datblygiadau tai fydd yn cyfrannu at greu effaith negyddol ac andwyol pellach ar y Gymraeg mewn sir lle mae bregustra ieithyddol yn endemig. O ganlyniad, NID yw'r brawddegau "Ni fydd cynigion datblygu sy'n cael effaith andwyol ar fywiogrwydd a hyfywedd y Gymraeg a diwylliant Cymru'n cael eu caniatáu oni bai y gellir lliniaru'r effaith. Bydd disgwyl i'r holl gynigion datblygu y mae WL1 yn berthnasol iddynt nodi mesurau sy'n gwella buddiannau'r Gymraeg a diwylliant Cymru." yn ffeithiol gywir.

We object to the following new paragraph:

"Proposals for large scale housing development on large windfall sites which will individually or cumulatively exceed the annual windfall allowance within the Plan will be required to submit a Welsh Language Impact Assessment which will set out how the proposed development will protect, promote and enhance the Welsh language."

We believe that a number of small scale housing developments when considered together across the county create a cluster that is very likely to have an impact on the language of the county's communities, particularly in small rural communities where the arrival of 5 new houses and 5 families changes the nature of that community. Given the "significant reduction in the number of Welsh speakers across the County which shows the fragile nature of the language in Carmarthenshire" there is a real need to carry out an assessment of the impact on the Welsh language on all new housing developments of 5 or more units.

We oppose the deletion of the following paragraph...

"11.181 The Plan's Strategy provides for organic growth on a small scale within the Rural Villages and policies HOM1 and HOM3 build upon this allowing development of appropriate scale and in appropriate locations. It is considered that incremental development on this scale can make a positive contribution towards the sustainable growth of the Welsh language in rural communities, and any negative impacts are likely to be absorbed by the community. Unforeseen development of significant scale which is not allowed for in the Plan's policies may not be compatible with the Plan's Strategy, and their impacts are therefore unassessed and unknown. In the event that such proposals are presented for consideration, they will need to be accompanied by a full assessment of their likely effects upon the Welsh language."

The omission of this requirement further weakens the series of measures to protect Welsh as a community living language and no explanation is offered for its deletion. But the wording needs to be challenged as developments of this scale can also be negative and there is no guarantee that they can be absorbed by the community. The evidence of the last 3 censuses confirms that, and this underlines the need for this requirement to be retained in the LDP.

Otherwise the statement is a subjective, illuminating, baseless and incorrect assertion.

As it currently stands, Strategic Policy – SP 8: Welsh Language and Culture is not sufficient or robust enough to withstand the impact of housing developments which will contribute to creating a further negative and adverse impact on the Welsh language in a county where linguistic vulnerability is endemic. As a result, the sentences "Development proposals which have a detrimental impact on the vitality and viability of the Welsh language and culture will not be permitted unless the impact can be mitigated. All development proposals subject to WL1, will be expected to identify measures which enhance the interests of the Welsh language and culture." are NOT factually correct.

Change suggested by respondent:

Cadw'r paragraff wedi'i ddileu. Dileu y paragraff newydd.

Retain the deleted paragraph. Delete the new paragraph.

Attachments:

Full representation - Welsh - <https://carmarthenshire.oc2.uk/a/6kh>

Translation of Comments - <https://carmarthenshire.oc2.uk/a/6kj>

email cover redacted - <https://carmarthenshire.oc2.uk/a/6md>

MAC 033

Support

Summary of representations:

Supports change in relation to Planning obligations to include ecology

Summary of representation changes to plan:

No change to the Plan

Response:

Support welcomed

Action:

No change to the Plan.

6056

Support

Document Element: MAC 033

Respondent: Natural Resources Wales

Summary:

Support the change in relation to Planning obligations to include ecology.

Change suggested by respondent:

No change to Plan.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

Support

Summary of representations:

The Council is supportive of contributions required to deliver or fund improvements to infrastructure, ecology, community facilities and other services and facilities to address requirements or impacts arising from the development and of contributions towards the future and ongoing maintenance of such provision.

Summary of representation changes to plan:

No change to the Plan.

Response:

Support welcomed.

Action:

No change to the Plan.

6086**Support**

Document Element: MAC 033

Respondent: Llanllawddog Community Council

Summary:

The Council is supportive of contributions required to deliver or fund improvements to infrastructure, ecology, community facilities and other services and facilities to address requirements or impacts arising from the development and of contributions towards the future and ongoing maintenance of such provision.

Change suggested by respondent:

No change to the Plan

Attachments:

Email Representation redacted - <https://carmarthenshire.oc2.uk/a/6mw>

MAC 036

Object

Summary of representations:

In the interests of clarity / accuracy, we suggest that first new paragraph after paragraph 11.205 of Policy INF4 is amended.

Summary of representation changes to plan:

Amend the third sentence in the first new paragraph after paragraph 11.205 as follows:

'It is acknowledged that the removal of surface water may offer wider benefits including making a contribution towards achieving nutrient neutrality where required'.

Response:

The Council agrees with the changes suggested by the respondent in the interest of clarity and meaning.

In the interest of consistency the Council's proposes to insert the word 'and minor' after the words 'major' within the first sentence of the new paragraph after paragraph 11.205.

Action:

Amend the third sentence in the first new paragraph after paragraph 11.205 to:

'It is acknowledged that the removal of surface water may offer wider benefits including making a contribution towards achieving nutrient neutrality where required'.

In the first sentence within the new paragraph after 11.205 to state
'As part of granting planning permission for relevant major and minor development'

6048

Object

Document Element: MAC 036

Respondent: Natural Resources Wales

Summary:

We have one further comment with regards to MAC 036 and the proposed amendments to Policy INF4. Again, this comment relates to further edits to the proposed text for reasons of clarity / accuracy.

In regard to the new paragraphs added after paragraph 11.205, we suggest that the third sentence is amended as follows:

'It is acknowledged that the removal of surface water may offer wider benefits including making a contribution towards achieving nutrient neutrality where required'.

Change suggested by respondent:

Amend wording as set out above.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

Support

Summary of representations:

The Policy should recognise that surface water removal may not necessarily outright “secure nutrient neutrality” but could be utilised as part of its strategy.

We commend the Council’s inclusion of a ‘Burry Inlet’ SPG and welcome the reference to flow calculations in its supporting appendices.

Summary of representation changes to plan:

The Policy should recognise that surface water removal may not necessarily outright “secure nutrient neutrality” but could be utilised as part of its strategy.

Response:

Reference is made to MAC036 and the insertion of the paragraph after 11.205 which clearly references the opportunity for surface water removal to contribute to nutrient neutrality.

The Council welcomes the support relating to the SPG and flow calculations

Action:

No action.

5964

Support

Document Element: MAC 036

Respondent: Dwr Cymru/Welsh Water

Summary:

The Policy should recognise that surface water removal may not necessarily outright “secure nutrient neutrality” but could be utilised as part of its strategy.

We commend the Council’s inclusion of a ‘Burry Inlet’ SPG and welcome the reference to flow calculations in its supporting appendices.

Change suggested by respondent:

-

Attachments: None

Object

Summary of representations:

Broadly supportive of the policy with objections to aspects of Policy INF4. The detail are considered within Swansea’s other representations to INF4

Summary of representation changes to plan:

Changes in light of other representations.

Response:

Noted. Support is welcomed for the policy. Reference is made to other responses submitted by the respondent. These are dealt with through separate representations.

Action:

No action.

6039

Object

Document Element: MAC 036**Respondent:** City & County of Swansea**Summary:**

Broadly supportive of the policy with objections to aspects of Policy INF4. The detail are considered within Swansea's other representations to INF4

Change suggested by respondent:

Change to the Plan considered in Swansea City Council's other representations

Attachments:

Email Representation redacted - <https://carmarthenshire.oc2.uk/a/6mv>

Object

Summary of representations:

"...the interest that compensatory surface water removal in fact serves is the shellfish water protected areas of the Burry Inlet, designated under the Water Framework Directive – a bacteriological water-quality interest... That is a distinct matter from the nutrient-enrichment interests of the European Marine Site under the Habitats Regulations. Consequently... it is proposed to replace the reference to 'Carmarthen Bay and Estuaries European Marine Site' with 'Water Framework Directive'."

Summary of representation changes to plan:

Replace reference to 'Carmarthen Bay and Estuaries European Marine Site' with 'Water Framework Directive'."

Response:

Noted. The Council recognises the point of clarity and accuracy made by the respondent and is supportive of this change to make sure the policy is clear in its purpose and meaning

Action:

Amend the reference to Carmarthen Bay and Estuaries European Marine Site' with 'Water Framework Directive'."

6040

Object

Document Element: MAC 036**Respondent:** City & County of Swansea**Summary:**

"...the interest that compensatory surface water removal in fact serves is the shellfish water protected areas of the Burry Inlet, designated under the Water Framework Directive – a bacteriological water-quality interest... That is a distinct matter from the nutrient-enrichment interests of the European Marine Site under the Habitats Regulations. Consequently... it is proposed to replace the reference to 'Carmarthen Bay and Estuaries European Marine Site' with 'Water Framework Directive'."

Change suggested by respondent:

Amend the wording within the plan

Attachments:

Email Representation redacted - <https://carmarthenshire.oc2.uk/a/6mv>

Object

Summary of representations:

The reference is limited to minor developments whilst the first paragraph relates to major developments. The omission of major from the second paragraph would seem at odds with the overall approach in relation to nutrient mitigation. It is proposed to add 'major' alongside minor within the second paragraph."

Summary of representation changes to plan:

Add the word major alongside minor within the second paragraph.

Response:

Noted. The Council recognises the point of clarity and accuracy made by the respondent and is supportive of this change to make sure the policy is clear in its purpose and meaning by including the word 'major' alongside minor within the second paragraph

Action:

Amend the wording within the second paragraph.

6041

Object

Document Element: MAC 036

Respondent: City & County of Swansea

Summary:

The reference is limited to minor developments whilst the first paragraph relates to major developments. The omission of major from the second paragraph would seem at odds with the overall approach in relation to nutrient mitigation. It is proposed to add 'major' alongside minor within the second paragraph."

Change suggested by respondent:

Amend wording within the Plan

Attachments:

Email Representation redacted - <https://carmarthenshire.oc2.uk/a/6mv>

Object

Summary of representations:

"the term 'will be required to remove' surface water — this suggests that there are no examples where on a case by case basis that requirement will not need to be applied. It also leaves no route to the use of surplus betterment (paragraph 11.209) ... It is proposed to amend the policy through the replacement of 'will' with 'may'.

Summary of representation changes to plan:

proposed to amend the policy through the replacement of 'will' with 'may'.

Response:

Noted. The Council recognises the point of clarity and accuracy made by the respondent and is supportive of this change to make sure the policy is clear in its purpose and meaning through the inclusion of the word 'may' instead of 'will'. This ensures there is consistency of approach with that set out within the reasoned justification and reflects the collaborative cross border approach which underpins the Burry Inlet strategy applied by the authorities.

Action:

Amend the wording within the policy through the replacement of 'will' with 'may'.

6043

Object

Document Element: MAC 036

Respondent: City & County of Swansea

Summary:

The term 'will be required to remove' surface water – this suggests that there are no examples where on a case by case basis that requirement will not need to be applied. It also leaves no route to the use of surplus betterment (paragraph 11.209) ... It is proposed to amend the policy through the replacement of 'will' with 'may'.

Change suggested by respondent:

Amend wording within the Plan

Attachments:

Email Representation redacted - <https://carmarthenshire.oc2.uk/a/6mv>

Object

Summary of representations:

"the proposed inclusion of the 'quantifiable amount calculated as 0.013 litres/second'... does not reflect how this is calculated in practice. This is typically done on a case-by-case base, using the latest evidence available to determine likely foul flows."

Summary of representation changes to plan:

Include a statement to reflect the case by case basis of such calculations.

Response:

Noted. In the interest of clarity and consistency MAC036 would benefit from the inclusion of an additional statement to reflect the case by case nature of such calculations in practice and the contribution made by the latest evidence in determining flow rates.

Further information in relation to such calculations and their application will also be set within the Burry Inlet SPG.

Action:

Inclusion of an additional statement to reflect the case by case nature of such calculations in practice.

6044

Object

Document Element: MAC 036

Respondent: City & County of Swansea

Summary:

"the proposed inclusion of the 'quantifiable amount calculated as 0.013 litres/second'... does not reflect how this is calculated in practice. This is typically done on a case-by-case base, using the latest evidence available to determine likely foul flows."

Change suggested by respondent:

Amend wording within the Plan

Attachments:

Email Representation redacted - <https://carmarthenshire.oc2.uk/a/6mv>

Comment

Summary of representations:

'it may well be the case that over the Plan period, potential future DCWW investment may mean that the position in respect of the need for surface water removal to be undertaken by developers will be no longer applicable, therefore again – flexibility is key.

Summary of representation changes to plan:

No change.

Response:

Comments noted. The Council recognises that the position will change over the plan period. This will continually be under review.

Action:

No action.

6046

Comment

Document Element: MAC 036

Respondent: City & County of Swansea

Summary:

'it may well be the case that over the Plan period, potential future DCWW investment may mean that the position in respect of the need for surface water removal to be undertaken by developers will be no longer applicable, therefore again – flexibility is key.

Change suggested by respondent:

No change to the Plan

Attachments:

Email Representation redacted - <https://carmarthenshire.oc2.uk/a/6mv>

Comment

Summary of representations:

We appreciate that the above proposed changes may result in the requirement for some consequential amendments to the reasoned justification but hope that such amendments are not extensive. Also, with reference to the proposed SPG, we would welcome the opportunity to contribute and comment at the appropriate time

Summary of representation changes to plan:

No change.

Response:

Comments noted.

Action:

No change.

6047

Comment

Document Element: MAC 036**Respondent:** City & County of Swansea**Summary:**

We appreciate that the above proposed changes may result in the requirement for some consequential amendments to the reasoned justification but hope that such amendments are not extensive. Also, with reference to the proposed SPG, we would welcome the opportunity to contribute and comment at the appropriate time

Change suggested by respondent:

No change to the Plan

Attachments:

Email Representation redacted - <https://carmarthenshire.oc2.uk/a/6mv>

Comment

Summary of representations:

Supports the principle of the proposed amendments to INF4, subject to further information being provided by the emerging Burry Inlet SPG.

Please see the respondent's full summary below.

Summary of representation changes to plan:

Supports the principle of the proposed amendments to INF4, subject to further information being provided by the emerging Burry Inlet SPG. In that regard it will be important that the requirements are clearly set out and applied proportionately through the development management process to provide certainty for applicants and ensure that the delivery of much needed housing is not unnecessarily delayed or constrained, whilst continuing to secure appropriate environmental safeguards.

Response:

Noted. The Council is preparing Supplementary Planning Guidance to support the implementation of its policies in respect of the Burry Inlet.

Action:

No change to the Plan.

6017

Comment

Document Element: MAC 036**Respondent:** Ms Zoe Aubery**Agent:** Boyer Planning**Summary:**

Policy INF4 (Llanelli Wastewater Treatment Works Catchment Surface Water Removal). "In order to protect the water quality of the Carmarthen Bay and Estuaries European Marine Site, proposals for major development that would drain directly into the Llanelli Waste Water Treatment Works will be required to remove a quantifiable amount of surface water from the combined sewer system.

Minor development which drains directly into the Llanelli Wastewater Treatment Works may also introduce the removal of surface water as a mitigation measure to secure nutrient neutrality where required in accordance with Policy CCH4."

BR supports the principle of the proposed amendments and acknowledges that Dŵr Cymru Welsh Water (DCWW) have confirmed there is sufficient capacity exists within the Llanelli Wastewater Treatment Works (WwTW) to accommodate the level of growth identified within the RLDP.

It is also noted that DCWW has requested that major development proposals draining directly to the Llanelli WwTW should be required to remove a quantifiable amount of surface water from the combined sewer network. This requirement is reflected within the proposed policy wording.

The rationale for this approach is understood to be associated with the fact the majority of the sewerage network within the Llanelli WwTW catchment comprises a combined system conveying both foul and surface water flows. Therefore, requiring major development proposals to undertake compensatory surface water removal as part of the planning process remains consistent with Welsh Government guidance and is intended to ensure that development does not give rise to adverse effects on the Carmarthen Bay and Estuaries SAC and/or the Burry Inlet SPA.

Supporting text explains that, as part of the determination of planning applications for relevant major developments, CCC will require the removal of a quantifiable amount of surface water from the combined sewer system. Whilst this figure is not expressly contained within the proposed policy wording, it is understood that the amount of new foul flow identified within Policy INF4 has been calculated at 0.013 litres per second per residential property. BR raises no objection in principle to this approach on the basis that further guidance will be produced in the form of the emerging Burry Inlet Supplementary Planning Guidance (SPG). In the interest of soundness clear and robust guidance must be provided setting out the Council's expectations in respect of the details needed considered at the planning application stage via drainage reports.

It is recognised that the removal of surface water from the combined sewer network is likely to require bespoke solutions, dependent upon the scale, characteristics and location of individual developments. BR therefore supports the approach whereby mitigation measures are considered on a site-specific basis. As identified within the Council's Habitats Regulations Assessment – Additional Sites Addendum (March 2025), the site at Land off Heol y Mynydd, Bryn (Ref. PrC2/(v)) is located approximately 1.4km from the Carmarthen Bay and Estuaries SAC and approximately 2 km from the Burry Inlet SPA. Whilst the Council concludes that localised effects associated with the site's proximity to these designated sites are unlikely. BR remains committed to ensuring that appropriate mitigation measures are secured where necessary. Such measures may include a combination of:

- design-led mitigation measures;
 - utilisation of existing headroom and permit capacity associated with the relevant WwTW;
- and
- strategic mitigation solutions capable of addressing any additional nutrient loading arising from future development.

By virtue of the above BR supports the principle of the proposed amendments, subject to further information being provided by the emerging Burry Inlet SPG. In that regard it will be important that the requirements are clearly set out and applied proportionately through the development management process to provide certainty for applicants and ensure that the delivery of much needed housing is not unnecessarily delayed or constrained, whilst continuing to secure appropriate environmental safeguards.

Change suggested by respondent:

No change to the Plan, however guidance is required and clearly set out and applied proportionately through the development plan process.

Attachments:

Cover email - <https://carmarthenshire.oc2.uk/a/6zn>

Representation form - <https://carmarthenshire.oc2.uk/a/6zy>

Full representation form - <https://carmarthenshire.oc2.uk/a/6zp>

Comment

Summary of representations:

MAC 036 Policy INF4: Llanelli Wastewater Treatment Works Catchment Surface Water Removal

As highlighted in our original comments, we welcome the inclusion of Policy INF4 and are supportive of its principles to satisfy the requirements of the Burry Inlet Memorandum of Understanding (MoU) through compensatory surface water removal. We note that these amendments (MAC036) propose to define the threshold for major development sites and the possible requirement for surface water removal for minor developments. However, whilst we acknowledge this provision is to identify a mitigation measure for nutrient neutrality, the NRW/Welsh Government 'Mitigation Measures Menu' recognises that surface water removal (or SuDS) can only provide a modest removal rate. Therefore, whilst the principle may be acceptable, the Policy should recognise that surface water removal may not necessarily outright "secure nutrient neutrality", in accordance with Policy CCH4, but could be utilised as part of its strategy.

Turning to Paragraph 11.205, we commend the Council's inclusion of a 'Burry Inlet' SPG and welcome the reference to flow calculations in its supporting appendices. We are supportive of this text and would add that the quantifiable amount of surface water to be removed can be expressed as l/s or in terms of its area (sqm), for residential development, which aligns to the SPG appendices.

Summary of representation changes to plan:

No change to the Plan.

Response:

Comments Welcomed.

Action:

No change to the Plan.

5991

Comment

Document Element: MAC 036**Respondent:** Dwr Cymru/Welsh Water**Summary:****MAC 036 Policy INF4: Llanelli Wastewater Treatment Works Catchment Surface Water Removal**

As highlighted in our original comments, we welcome the inclusion of Policy INF4 and are supportive of its principles to satisfy the requirements of the Burry Inlet Memorandum of Understanding (MoU) through compensatory surface water removal. We note that these amendments (MAC036) propose to define the threshold for major development sites and the possible requirement for surface water removal for minor developments. However, whilst we acknowledge this provision is to identify a mitigation measure for nutrient neutrality, the NRW/Welsh Government 'Mitigation Measures Menu' recognises that surface water removal (or SuDS) can only provide a modest removal rate. Therefore, whilst the principle may be acceptable, the Policy should recognise that surface water removal may not necessarily outright "secure nutrient neutrality", in accordance with Policy CCH4, but could be utilised as part of its strategy.

Turning to Paragraph 11.205, we commend the Council's inclusion of a 'Burry Inlet' SPG and welcome the reference to flow calculations in its supporting appendices. We are supportive of this text and would add that the quantifiable amount of surface water to be removed can be expressed as l/s or in terms of its area (sqm), for residential development, which aligns to the SPG appendices.

Change suggested by respondent:

-

Attachments:Written Response - <https://carmarthenshire.oc2.uk/a/6m4>Cover email - <https://carmarthenshire.oc2.uk/a/6m5>

MAC 037

Support

Summary of representations:

■ Support MAC 037 in relation to INF5: Rural Allocations outside Public Sewerage System catchments.

Summary of representation changes to plan:

■ No change to the Plan

Response:

■ Support welcomed.

Action:

■ No change to the Plan.

6057

Support

Document Element: MAC 037

Respondent: Natural Resources Wales

Summary:

■ Support MAC 037 in relation to INF5: Rural Allocations outside Public Sewerage System catchments.

Change suggested by respondent:

■ No change to Plan.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

MAC 043

Object

Summary of representations:

Newid y geiriad i gydnabod y caiff 'gor-grynodiad' o ddatblygiadau Carafanau Teithiol, Gwersylla a Llety Gwersylla Amgen nad yw'n Barhaol effaith negyddol ar y Gymraeg mewn cymunedau.

Amend the wording to acknowledge that an 'over concentration' of Touring Caravan, Camping and Non - Permanent Alternative Camping Accommodation has a negative impact on the Welsh language within communities.

Summary of representation changes to plan:

Newid y geiriad fel yr eglurwyd.

Amend the wording as explained.

Response:

Mae'r Polisi wedi bod yn destun archwiliad ac o ganlyniad cynigiwyd y gwelliannau hyn i sicrhau cadernid y Cynllun. Byddai angen i welliannau pellach gael eu cefnogi gan dystiolaeth gadarn a bod yn weithredadwy yn ystod y cam cais cynllunio. Nid oes digon o wybodaeth wedi'i darparu i sicrhau bod hyn yn wir.

The Policy has been the subject of examination with these amendments consequently proposed to ensure the Plan's soundness. Further amendments would need to be supported by robust evidence and be implementable at the planning application stage. There is insufficient information provided to demonstrate that this is the case.

Action:

Dim newid i'r Cynllun

No change to the Plan.

6081**Object**

Document Element: MAC 043

Respondent: Dyfodol i'r Iaith Cyf

Summary:

VE3: Carafannau Teithiol, Gwersylla a Llety Gwersylla Amgen nad yw'n Barhaol

"Dylid ychwanegu'r canlynol fel paragraff newydd rhwng paragraff 11.254 a pharagraff 11.255

Mae'r term "gor-grynodiad" yng nghyd-destun y Polisi hwn yn cyfeirio at amlhau safleoedd carafannau teithiol, safleoedd gwersylla, a safleoedd gwersylla amgen nad ydynt yn barhaol sy'n arwain at effeithiau andwyol ar gymeriad, swyddogaeth ac amwynder yr ardal. Dylid ystyried nifer a dwysedd cyfleusterau tebyg yn yr ardal yn ogystal â'u patrwm dosbarthiad ac a yw'r effeithiau gweledol neu amgylcheddol cronol yn tynnu sylw oddi wrth gymeriad y dirwedd, y forwedd neu'r drefwedd."

Caiff hyn hefyd effaith negyddol ar y Gymraeg mewn cymunedau ac mae angen cydnabod ac ychwanegu hynny yn y geiriad newydd.

VE3: Touring Caravan, Camping and Non-Permanent Alternative Camping Accommodation

"The following is to be added as a new paragraph between paragraph 11.254 and paragraph 11.255

The term "over concentration" in the context of this Policy refers to the proliferation of touring caravans, camping, and alternative non-permanent camping sites leading to adverse impacts on the character, function, and amenity of the locality. The number and density of similar facilities in the area should be considered as well as their pattern of distribution and whether the cumulative visual or environmental impacts detracts from the landscape, seascape or townscape character."

This will also have a negative impact on the Welsh language in communities and this needs to be recognised and added in the new wording.

Change suggested by respondent:

Newid y geiriad i gydnabod y caiff hyn effaith negyddol ar y gymraeg mewn cymunedau.

Amend the wording to acknowledge that this has a negative impact on the Welsh language within communities.

Attachments:

Full representation - Welsh - <https://carmarthenshire.oc2.uk/a/6kh>

Translation of Comments - <https://carmarthenshire.oc2.uk/a/6kj>

email cover redacted - <https://carmarthenshire.oc2.uk/a/6md>

MAC 045

Object

Summary of representations:

In order to comply with TAN15 we advise expanding point l. of Policy SP12 to include incorporating resilient design into redevelopment / alteration of existing development and not just confined to new development.

Summary of representation changes to plan:

Expand point l. of Policy SP12 to include incorporating resilient design into redevelopment / alteration of existing development.

Response:

The Council agrees with the amendment proposed by the respondent in order to maximise flood resilience

Action:

Expand on point l of Policy SP12 as follows

Incorporate flood resilient design into new construction and redevelopment / alterations of existing development in areas defined as Zones 2 and 3 within the Flood Map for Planning (and the TAN 15 Defended Zones).

6052

Object

Document Element: MAC 045

Respondent: Natural Resources Wales

Summary:

Strategic Policy – SP 12: Placemaking and Sustainable Places.

We welcome the incorporation of flood resilient design to new construction in a flood zone. However, it should be stressed that new construction in a flood zone should only happen if it can be compliant with TAN15 and that resilient design should not be used as a reason, or as mitigation, for inappropriate development in flood zones.

We advise expanding point i. to include incorporating resilient design into redevelopment / alteration of existing development and not just confined to new development.

Change suggested by respondent:

Expand point i of Strategic Policy SP12 as set out above.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

Object

Summary of representations:

The added words are not robust enough to protect equestrian access to the countryside under SP12

Summary of representation changes to plan:

Strengthen the policy to protect equestrian access through both Active Travel and general planning considerations.

Response:

Noted. The plan makes appropriate provision for equestrian access. Whilst we note the comments made in relation to the FOI and Active Travel, these are matters outside the remit of this MAC consultation

Action:

No change.

5996

Object

Document Element: MAC 045

Respondent: Mrs Karen Burch

Summary:

I don't think the added words are robust enough to protect equestrian access to the countryside under SP12, which I have commented on previously.

A recent FOI request to CCC asking about equestrian consultation both for Active Travel and other communication under general planning, provides insufficient action or consideration of equestrians and the resulting decisions create a barrier for us to access our off road networks due to changes in the road network, development, and Active Travel routes. The Planning System only allows the Rights of Way Team to comment on actual rights of way, not how we access them and there are no other Statutory consultees that speak for us. We cannot teleport to our bridleways and green space. The FOI request reply confirms that comments by equestrians are not recorded at scheme level because we are not considered active travellers. In order to ensure that we have a voice, particularly about our safety when roadside paths are created or off road routes, it is necessary to include that we should not be worse off from a scheme that is designed to make improvements for other users.

How is CCC identifying whether equestrians are already using a route highlighted for AT improvement or whether there is demand to be included in any scheme, as per ATAG guidance below? The current public consultation process is not robust enough to conform to the guidance below and something needs to be added to the LDP SP12 to ensure that we are not put at risk on roads we have legal right to use and informal off road paths (railway lines) that we currently ride. More is needed to identify routes that we currently use and where there is demand for safe off road links in our ever shrinking network within our community because roads are now too dangerous to ride.

section 1.3.6:

"Equestrianism is overwhelmingly for leisure purposes rather than as a mode of transport as it rarely displaces a car journey. Forms of equestrian travel (horse riding, carriage driving, pony and trap etc.) are not considered forms of active travel. However, in delivering the provisions of the Act, local authorities should be aware that equestrians are vulnerable road users and should not restrict equestrian access to routes that they currently enjoy. Bridleways can be used by equestrians, walkers and cyclists and so may form part of an active travel route. Enhancements to bridleways should not impede equestrian use or require them to use a less safe route instead. In some cases, it may be more appropriate for all users if separate provision is made for walkers, cyclists and equestrian users. Where active travel routes are planned on an alignment for which there is also high demand from horse riders, the feasibility of accommodating them should also be assessed."

8.2.10:

"Effective consultation at network and scheme level needs to target both current and potential users of walking and cycling infrastructure. Whilst the focus of active travel engagement will be upon utility journeys, these routes may also be used for leisure and sports purposes, including equestrians in rural/semi-rural areas and so this should be borne in mind when targeting who to seek input from during the engagement and consultation process."

11.32.5:

"Equestrians should not be denied access to routes that they currently have the right to use by changing the classification of the rights of way. There needs to be clear signing of which routes are intended for use by equestrians. If widths permit, a separate unsealed surface may be preferable for equestrians."

*Attachment re Towy Valley Path where equestrians robustly attended consultations and requested access to this route but there is no mention of equestrians in the Statement of Case

Change suggested by respondent:

Change to the Plan

Attachments:

Further evidence attachment - <https://carmarthenshire.oc2.uk/a/6hn>

Cover email - <https://carmarthenshire.oc2.uk/a/6z7>

MAC 046**Comment****Summary of representations:**

The Coal Authority, trading as the Mining Remediation Authority, is pleased to see that modifications to the policy have not impacted criteria (e) which requires development proposals to take account of ground conditions and address ground stability.

Summary of representation changes to plan:

No change to the Plan

Response:

Comments welcomed

Action:

No action

5961**Comment**

Document Element: MAC 046

Respondent: Mining Remediation Authority

Summary:

The Coal Authority, trading as the Mining Remediation Authority, is pleased to see that modifications to the policy have not impacted criteria (e) which requires development proposals to take account of ground conditions and address ground stability.

Change suggested by respondent:

-

Attachments: None

Comment

Summary of representations:

Acknowledge amendments (MAC 046) proposed to the criteria for Policy PSD1 and welcome reference to maximised opportunities for water resilience in criteria (g). Agree that water efficiency in new developments can offer multiple benefits and we recognise it can positively contribute to nutrient neutrality provided it forms part of a wider package of mitigation,

Summary of representation changes to plan:

No change to the Plan

Response:

Noted.

Action:

No change to the Plan.

5965

Comment

Document Element: MAC 046

Respondent: Dwr Cymru/Welsh Water

Summary:

We acknowledge amendments (MAC 046) proposed to the criteria for Policy PSD1 and welcome reference to maximised opportunities for water resilience in criteria (g). We agree that water efficiency in new developments can offer multiple benefits and we recognise it can positively contribute to nutrient neutrality provided it forms part of a wider package of mitigation, as referenced in Paragraph 11.284. Similar to the above (MAC 036), we would highlight that water efficiency measures may not secure nutrient neutrality, in accordance with Policy CCH4, but could be utilised as part of its strategy

Change suggested by respondent:

-

Attachments: None

Comment

Summary of representations:

MAC 046 Policy PSD1: Effective Design Solutions: Principles of Placemaking

We acknowledge amendments (MAC 046) proposed to the criteria for Policy PSD1 and welcome reference to maximised opportunities for water resilience in criteria (g). We agree that water efficiency in new developments can offer multiple benefits and we recognise it can positively contribute to nutrient neutrality provided it forms part of a wider package of mitigation, as referenced in Paragraph 11.284. Similar to the above (MAC 036), we would highlight that water efficiency measures may not secure nutrient neutrality, in accordance with Policy CCH4, but could be utilised as part of its strategy.

Summary of representation changes to plan:

No change to the Plan.

Response:

Noted.

Action:

No change to the Plan.

5992

Comment

Document Element: MAC 046**Respondent:** Dwr Cymru/Welsh Water**Summary:**

MAC 046 Policy PSD1: Effective Design Solutions: Principles of Placemaking

We acknowledge amendments (MAC 046) proposed to the criteria for Policy PSD1 and welcome reference to maximised opportunities for water resilience in criteria (g). We agree that water efficiency in new developments can offer multiple benefits and we recognise it can positively contribute to nutrient neutrality provided it forms part of a wider package of mitigation, as referenced in Paragraph 11.284. Similar to the above (MAC 036), we would highlight that water efficiency measures may not secure nutrient neutrality, in accordance with Policy CCH4, but could be utilised as part of its strategy

Change suggested by respondent:

-

Attachments:Written Response - <https://carmarthenshire.oc2.uk/a/6m4>Cover email - <https://carmarthenshire.oc2.uk/a/6m5>

Comment

Summary of representations:

Whilst the proposed amendments to Policy PSD1 are not identical in wording to that introduced under Policy INF4. Both seek to promote the efficient use of water in new development and recognise the wider role that water management measures can play in contributing towards nutrient neutrality.

To avoid repetition, please refer to our response to Policy INF4. In particular, the importance of ensuring sufficient flexibility is incorporated into both the proposed policy wording and that of supporting text to reflect the fact that, where necessary, nutrient mitigation may be achieved through a combination of different mechanisms.

This approach is essential to ensure the RLDP accurately reflects the range of options through which nutrient mitigation may be secured and thus support the timely delivery of much-needed housing whilst ensuring compliance with the Habitats Regulations.

Summary of representation changes to plan:

No change to the Plan subject to the flexibility in the policy and supporting text relating to the efficient use of water.

Response:

Comments Noted.

Action:

No change to the Plan.

6018

Comment

Document Element: MAC 046**Respondent:** Ms Zoe Aubery**Agent:** Boyer Planning**Summary:**

Whilst the proposed amendments to Policy PSD1 are not identical in wording to that introduced under Policy INF4. Both seek to promote the efficient use of water in new development and recognise the wider role that water management measures can play in contributing towards nutrient neutrality.

To avoid repetition, please refer to our response to Policy INF4. In particular, the importance of ensuring sufficient flexibility is incorporated into both the proposed policy wording and that of supporting text to reflect the fact that, where necessary, nutrient mitigation may be achieved through a combination of different mechanisms.

This approach is essential to ensure the RLDP accurately reflects the range of options through which nutrient mitigation may be secured and thus support the timely delivery of much-needed housing whilst ensuring compliance with the Habitats Regulations.

Change suggested by respondent:

No change to the plan

Attachments:

Cover email - <https://carmarthenshire.oc2.uk/a/6zn>

Representation form - <https://carmarthenshire.oc2.uk/a/6zy>

Full representation form - <https://carmarthenshire.oc2.uk/a/6zp>

MAC 052

Object

Summary of representations:

Wrth drafod polisi newydd PSD7: Diogelu Cyfleusterau Cymunedol, mae'r ymatebwr yn gofyn am ychwanegu geiriad newydd sy'n nodi y bod colled o gyfleusterau cymunedol yn cael effaith negyddol ar y Gymraeg mewn cymunedau.

When discussing the new policy PSD7: Protection of Community Facilities the respondent requests additional wording to acknowledge that the loss of community facilities has a negative impact on the Welsh language in communities.

Summary of representation changes to plan:

Ychwanegu geiriad newydd fel yr eglurwyd.

Add new wording as explained.

Response:

Cyflwynwyd y Polisi fel pwynt gweithredu yn ystod yr archwiliad i sicrhau cadernid y Cynllun. Byddai angen i unrhyw welliannau pellach i'r testun sicrhau bod y polisi arfaethedig a'i weithrediad yn seiliedig ar dystiolaeth gadarn sydd ar gael. Byddai absenoldeb dystiolaeth o'r fath, yn enwedig yng nghyfnod y cais cynllunio, yn tanseilio gweithrediad effeithiol y polisi. Nid oes unrhyw dystiolaeth ar gael nac wedi'i chyflwyno a fyddai'n cefnogi gweithrediad effeithiol y polisi hwn.

The Policy was introduced as an action point during the examination to ensure the Plan's soundness. Any further amendments to the text would need to ensure that the proposed policy and its implementation is founded on robust available evidence. The absence of such evidence particularly at planning application stage would undermine the effective implementation of the policy. No evidence is available or has been presented which would support the effective implementation of this policy.

Action:

Dim newid i'r Cynllun

No change to the Plan.

6082

Object

Document Element: MAC 052

Respondent: Dyfodol i'r Iaith Cyf

Summary:

VE3: Carafanau Teithiol, Gwersylla a Llety Gwersylla Amgen nad yw'n Barhaol "Dylid ychwanegu'r canlynol fel paragraff newydd rhwng paragraff 11.254 a paragraff 11.255

Mae'r term "gor-grynodiad" yng nghyd-destun y Polisi hwn yn cyfeirio at amlhau safleoedd carafannau teithiol, safleoedd gwersylla, a safleoedd gwersylla amgen nad ydynt yn barhaol sy'n arwain at effeithiau andwyol ar gymeriad, swyddogaeth ac amwynder yr ardal. Dylid ystyried nifer a dwysedd cyfleusterau tebyg yn yr ardal yn ogystal â'u patrwm dosbarthiad ac a yw'r effeithiau gweledol neu amgylcheddol cronol yn tynnu sylw oddi wrth gymeriad y dirwedd, y forwedd neu'r drefwedd."

Caiff hyn hefyd effaith negyddol ar y Gymraeg mewn cymunedau ac mae angen cydnabod ac ychwanegu hynny yn y geiriad newydd. Mae hyn hefyd yn wir wrth drafod "PSD7: Diogelu Cyfleusterau Cymunedol" sydd ond yn cyfeirio at "niweidio gwead cymdeithasol."

VE3: Touring Caravan, Camping and Non-Permanent Alternative Camping Accommodation

"The following is to be added as a new paragraph between paragraph 11.254 and paragraph 11.255

The term "over concentration" in the context of this Policy refers to the proliferation of touring caravans, camping, and alternative non-permanent camping sites leading to adverse impacts on the character, function, and amenity of the locality. The number and density of similar facilities in the area should be considered as well as their pattern of distribution and whether the cumulative visual or environmental impacts detracts from the landscape, seascape or townscape character."

This will also have a negative impact on the Welsh language in communities and this needs to be recognised and added in the new wording. This is also true when discussing "PSD7: Protection of Community Facilities." which only refers to "damaging social texture."

Change suggested by respondent:

Newid y geiriad i gydnabod y caiff hyn effaith negyddol ar y gymraeg mewn cymunedau.

Amend the wording to acknowledge that this has a negative impact on the Welsh language within communities.

Attachments:

Full representation - Welsh - <https://carmarthenshire.oc2.uk/a/6kh>

Translation of Comments - <https://carmarthenshire.oc2.uk/a/6kj>

email cover redacted - <https://carmarthenshire.oc2.uk/a/6md>

Comment

Summary of representations:

The respondent does not object to the requirements set out within Policy PSD8, which seek to ensure that new residential development contributes towards the provision of open space in accordance with the Council's proposed standards (please refer to extract below). That said, the respondent considers it important that the policy retains sufficient flexibility to recognise that, in some circumstances, it may not be feasible or appropriate for all open space standards to be met on-site. In such instances, the option to make a financial contribution in the form of a commuted sum towards the enhancement or provision of off-site open space should continue to be explicitly supported within the policy wording.

From a plan-making perspective retaining this mechanism will provide a pragmatic and proportionate approach to securing open space provision. Whilst ensuring that site-specific constraints do not unnecessarily impede the delivery of much-needed housing to demonstrate that the RLDP is logical, reasonable and balanced in accordance with Test 2 of the DPM.

Summary of representation changes to plan:

No change to the Plan subject to the policy allowing sufficient flexibility and pragmatism in securing open space provision.

Response:

Comments noted.

Action:

No change to the Plan.

6019

Comment

Document Element: MAC 054**Respondent:** Ms Zoe Aubery**Agent:** Boyer Planning**Summary:**

In principle BR does not object to the requirements set out within Policy PSD8, which seek to ensure that new residential development contributes towards the provision of open space in accordance with the Council's proposed standards (please refer to extract below). That said, BR considers it important that the policy retains sufficient flexibility to recognise that, in some circumstances, it may not be feasible or appropriate for all open space standards to be met on-site. In such instances, the option to make a financial contribution in the form of a commuted sum towards the enhancement or provision of off-site open space should continue to be explicitly supported within the policy wording.

From a plan-making perspective retaining this mechanism will provide a pragmatic and proportionate approach to securing open space provision. Whilst ensuring that site-specific constraints do not unnecessarily impede the delivery of much-needed housing to demonstrate that the RLDP is logical, reasonable and balanced in accordance with Test 2 of the DPM.

Change suggested by respondent:

No change to the Plan

Attachments:

Cover email - <https://carmarthenshire.oc2.uk/a/6zn>

Representation form - <https://carmarthenshire.oc2.uk/a/6zy>

Full representation form - <https://carmarthenshire.oc2.uk/a/6zp>

MAC 057**Object**

Summary of representations:

Objection to the blanket approach of a density of 50 dwellings per net hectare in settlement tiers 1-3 as this density is reflective of a very urban environment such as city locations. The County Council area does not have settlements of this scale and characteristic design. 50 dwellings per hectare on a net basis is over ambitious for all of the key communities in Carmarthenshire.

Summary of representation changes to plan:

Remove the blanket approach of a density of 50 dwellings per net hectare in settlement tiers 1-3.

Response:

Noted. The Council recognises the need for developments to be respectful and reflective of the characteristics of the settlement and site's context in the application of this policy. In this respect it would be supportive of additional clarification which would provide for such considerations.

Action:

Not applicable.

5999**Object**

Document Element: MAC 057

Respondent: Persimmon Homes West Wales

Summary:

PSD14: Housing Density

Object to the blanket approach of a density of 50 dwellings per net hectare in settlement tiers 1-3 as this density is reflective of a very urban environment such as city locations. The County Council area does not have settlements of this scale and characteristic design. Therefore whilst we support the efficient use of land and ensuring appropriately high density schemes, 50 dwellings per hectare on a net basis is over ambitious for all of the key communities in Carmarthenshire.

Change suggested by respondent:

Removal of the blanket approach of a density of 50 dwellings per net hectare in settlement tiers 1-3

Attachments:

Cover email - <https://carmarthenshire.oc2.uk/a/6m6>

Representation form redacted - <https://carmarthenshire.oc2.uk/a/6m8>

Object

Summary of representations:

Object to the blanket approach of a density of 50 dwellings per net hectare in settlement tiers 1-3, as this density is reflective of a very urban environment, such as city locations. The County Council area does not have settlements of this scale and characteristic

Summary of representation changes to plan:

Remove this requirement, reduce the figure, or provide a range of figures instead, and explain that the Council will seek a density appropriate to the site.

Response:

Noted. The Council recognises the need for developments to be respectful and reflective of the characteristics of the settlement and site's context in the application of this policy. In this respect it would be supportive of additional clarification which would provide for such considerations.

Action:

Not applicable.

5959

Object

Document Element: MAC 057

Respondent: The Home Builders Federation

Summary:

Object to the blanket approach of a density of 50 dwellings per net hectare in settlement tiers 1-3, as this density is reflective of a very urban environment, such as city locations. The County Council area does not have settlements of this scale and characteristic. Although in principle we support the efficient use of land and ensuring appropriately high-density schemes, 50 dwellings per hectare on a net basis is over ambitious for all of the key communities in Carmarthenshire.

Change suggested by respondent:

Remove this requirement, reduce the figure, or provide a range of figures instead, and explain that the Council will seek a density appropriate to the site.

Attachments: None

Object

Summary of representations:

The respondent does not object to the principle of promoting efficient use of land through higher residential densities in sustainable locations however the target density of 50 dwellings per hectare within Tier 1–3 settlements should be aspirational in nature rather than applied as a prescriptive requirement.

Please see the respondent's full summary below.

Summary of representation changes to plan:

Amend the policy so that the target density of 50 dwellings a hectare is aspirational rather than applied as a prescriptive requirement.

Response:

Noted. The Council recognises the need for developments to be respectful and reflective of the characteristics of the settlement and site's context in the application of this policy. In this respect it would be supportive of additional clarification which would provide for such considerations.

Action:

Not applicable.

6020**Object**

Document Element: MAC 057

Respondent: Ms Zoe Aubery

Agent: Boyer Planning

Summary:

BR acknowledges that Policy PSD14 is a new policy introduced through the Matter Arising Changes to the RLDP.

Whilst we does not object to the principle of promoting efficient use of land through higher residential densities in sustainable locations. BR considers that the target density of 50 dwellings per hectare within Tier 1–3 settlements should be aspirational in nature rather than applied as a prescriptive requirement. The delivery of well-designed, sustainable places should remain the primary consideration, with exact densities considered on a site-by-site basis having regard to local context, placemaking objectives and physical constraints.

PPW12 promotes the creation of high-quality places that respond positively to their surroundings rather than rigid density standards. An overly restrictive approach risks prioritising numerical targets over good design and could result in compromises with regards to proposed layouts, reduced POS/amenity provision, or even conflict with other policy requirements relating to landscape, ecology, heritage and residential amenity.

Furthermore, increasing requirements associated with SAB, green infrastructure and ecological mitigation all have a direct impact on the net developable area of sites. In such circumstances, lower density development may represent the most sustainable, appropriate and deliverable form of development.

Whilst the policy recognises that lower densities may be acceptable in certain circumstances, BR considers that greater emphasis should be placed on allowing departures from the indicative densities where justified by design considerations, viability evidence or other material planning considerations. Such an approach would ensure the policy is suitably flexible to support the delivery of high-quality developments across Carmarthenshire.

Lastly, the exact wording of Policy PSD14 should be revisited to avoid duplication and reduce any ambiguity when interpreting the policy through the development management process.

Change suggested by respondent:

Amend the Plan

Attachments:

Cover email - <https://carmarthenshire.oc2.uk/a/6zn>

Representation form - <https://carmarthenshire.oc2.uk/a/6zy>

Full representation form - <https://carmarthenshire.oc2.uk/a/6zp>

Object

Summary of representations:

Er mor resymol yw'r argymhellion y tro hwn parthed safle SuV20/h1, gofynnwn yn garedig i chwi ystyried y canlynol os gwelwch yn dda:

- Yn sgil y newid dramatig yn y ddarparieth dai yma ym Mhorth-y-rhyd, a gytunwch bod angen ail edrych ar yr angen am gartrefi yn y pentref?
- Oes tystiolaeth ddigonol bod gwir angen datblygu rhagor o safleoedd yn y pentref i gwrdd â'r galw yn lleol gan bod 42 o gartrefi yn cael eu hadeiladu ar safle Wernfraith?
- Pam bod y pentref lleiaf cynaliadwy unwaith eto'n cael cwota uwch?
- Onid yw'r pentref bellach wedi derbyn ei gwota?
- A ydych chi'n cytuno y dylid datrys y problemau sy'n bodoli gyda llifogydd a'r is-adeiledd cyn caniatáu rhagor o ddatblygu yn y pentref?

Although the recommendation for site SuV20/h1 appears reasonable (6 dwellings), MAP kindly requests on behalf of the residents, that you consider the following questions:

- In view of the recent dramatic change in housing provision in Porth-y-rhyd would you agree that there is a need to look again at the settlement's level of housing need?
- Is there sufficient evidence to claim that there is a need for more dwellings when taking into consideration that 42 units will be provided on the Wernfraith site to meet the local need?
- Why is it that the least sustainable village once again has a higher quota of dwellings?
- Has not the village of Porth-y-rhyd already reached the expected quota?
- Would you agree that there are serious issues (flooding and infrastructure) that need to be resolved before further developments are approved?

Summary of representation changes to plan:

Er mwyn sicrhau bod y dwysedd yn briodol ar gyfer y safle a neilltuwyd a chwestiynu a yw Porthyrhyd wedi cyrraedd ei gwota datblygu, yn enwedig o ran dwyseddau uwch ar safleoedd eraill yn y pentref a gan fod problemau difrifol y mae angen eu datrys (llifogydd a seilwaith).

To ensure density is appropriate for the allocated site and question if Porthyrhyd has reached its quota of development particularly with regards to higher densities on other sites in the village and as there are serious issues that need to be resolved (flooding and infrastructure).

Response:

Mae'r ymatebydd wedi gwneud sylwadau penodol i'r safle ynghylch safle SuV20/h1, fodd bynnag, nid yw'r sylwadau hyn wedi'u gwneud yn briodol gan nad ydynt yn ymwneud â Newidiadau Materion a Godwyd. Fodd bynnag, mae'r ymatebydd yn cynnwys sylw ar MAC057 - Dwysedd ac felly ystyrir bod yr elfen hon o'r ymateb wedi'i gwneud yn briodol. Nodir cyfeiriad at ddwysedd ar y safle, fodd bynnag, bydd materion manylion a nifer y tai yn cael eu hystyried ymhellach fel rhan o unrhyw gais cynllunio. Mae'r Cyngor o'r farn bod y polisi Dwysedd yn darparu digon o hyblygrwydd mewn perthynas â defnydd effeithlon o dir.

The respondent has made site specific representation relating to site SuV20/h1 however these comments are not duly made as it does not relate to a MAC. However the respondent includes a comment on MAC057 - Density and therefore this element of the response is deemed to be duly made. Reference to density on the site is noted, however matters of detail and housing numbers will be further considered as part of any planning application. The Council considers that the Density policy provides sufficient flexibility in relation to the efficient use of land.

Action:

Dim newid i'r Cynllun.

No change to the Plan.

6083

Object

Document Element: MAC 057

Respondent: Mudiad Amddiffyn Porthyrhyd

Summary:

Er mor resymol yw'r argymhellion y tro hwn parthed safle SuV20/h1, gofynnwn yn garedig i chwi ystyried y canlynol os gwelwch yn dda:

- Yn sgil y newid dramatig yn y ddarparieth dai yma ym Mhorth-y-rhyd, a gytunwch bod angen ail edrych ar yr angen am gartrefi yn y pentref?
- Oes tystiolaeth ddigonol bod gwir angen datblygu rhagor o safleoedd yn y pentref i gwrdd â'r galw yn lleol gan bod 42 o gartrefi yn cael eu hadeiladu ar safle Wernfraith?
- Pam bod y pentref lleiaf cynaliadwy unwaith eto'n cael cwota uwch?
- Onid yw'r pentref bellach wedi derbyn ei gwota?
- A ydych chi'n cytuno y dylid datrys y problemau sy'n bodoli gyda llifogydd a'r is-adeiledd cyn caniatáu rhagor o ddatblygu yn y pentref?

Although the recommendation for site SuV20/h1 appears reasonable (6 dwellings), MAP kindly requests on behalf of the residents, that you consider the following questions:

- In view of the recent dramatic change in housing provision in Porth-y-rhyd would you agree that there is a need to look again at the settlement's level of housing need?
- Is there sufficient evidence to claim that there is a need for more dwellings when taking into consideration that 42 units will be provided on the Wernfraith site to meet the local need?
- Why is it that the least sustainable village once again has a higher quota of dwellings?
- Has not the village of Porth-y-rhyd already reached the expected quota?
- Would you agree that there are serious issues (flooding and infrastructure) that need to be resolved before further developments are approved?

Change suggested by respondent:

Ystyried y polisi dwysedd tai a'i heffaith ar safle SuV/20/h1.

Consider the housing density policy and its impact on site SuV20/h1.

Attachments:

Email redacted - <https://carmarthenshire.oc2.uk/a/6mf>

MAC 065

Support

Summary of representations:

■ Support MAC 065 in relation to Policy NE1: Regional and Local Designations.

Summary of representation changes to plan:

■ No change to the Plan

Response:

■ Support welcomed.

Action:

■ No change to the Plan.

6058

Support

Document Element: MAC 065

Respondent: Natural Resources Wales

Summary:

■ Support MAC 065 in relation to Policy NE1: Regional and Local Designations.

Change suggested by respondent:

■ No change to Plan.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

MAC 066

Support

Summary of representations:

■ Support for MAC 066 in relation to Policy NE2: Biodiversity.

Summary of representation changes to plan:

■ No change to the Plan.

Response:

■ Support welcomed.

Action:

■ No change to the Plan.

6059

Support

Document Element: MAC 066

Respondent: Natural Resources Wales

Summary:

■ Support for MAC 066 in relation to Policy NE2: Biodiversity.

Change suggested by respondent:

■ No change to Plan.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

MAC 067**Object****Summary of representations:**

We advise that reference to the Llanelli Otter Mitigation Strategy is included in the reasoned justification (after paragraph 11.420) in Policy NE3.

Summary of representation changes to plan:

Include reference to the Llanelli Otter Mitigation Strategy in the reasoned justification (after paragraph 11.420) in Policy NE3.

Response:

Noted. The Council notes that an Otter Strategy is being prepared as part of the delivery of planning proposals and live planning applications within South Llanelli. Whilst it is noted that this would provide important information in relation the otter population within the area its inclusion within the policy would be wholly exceptional in that no other strategies or plans are referenced within that policy framework.

Action:

No change to the Plan.

6050**Object**

Document Element: MAC 067

Respondent: Natural Resources Wales

Summary:

NE3: Corridors, Networks and Features of Distinctiveness.

We have considered otters as a feature of the Carmarthen Bay and Estuaries SAC and are aware that you are currently developing a Llanelli Otter Mitigation Strategy, which will provide guidance regarding the provision and maintenance of suitable commuting corridors for otters moving upstream from their coastal habitat areas.

We request that reference to this document is included in the supporting text, after paragraph 11.420 of the reasoned justification.

Change suggested by respondent:

Reference the Llanelli Otter Mitigation Strategy in the supporting text, after paragraph 11.420.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

MAC 069

Support

Summary of representations:

■ Support MAC 069 in relation to Policy NE5 Coastal Management

Summary of representation changes to plan:

■ No change to the Plan.

Response:

■ Support welcomed.

Action:

■ No change to the Plan.

6060

Support

Document Element: MAC 069

Respondent: Natural Resources Wales

Summary:

■ Support MAC 069 in relation to Policy NE5 Coastal Management.

Change suggested by respondent:

■ No change to Plan.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

MAC 070

Support

Summary of representations:

■ Support MAC 070 in relation to Policy NE6 Coastal Development

Summary of representation changes to plan:

■ No change to the Plan.

Response:

■ Support welcomed.

Action:

■ No change to the Plan.

6061

Support

Document Element: MAC 070

Respondent: Natural Resources Wales

Summary:

■ Support MAC 070 in relation to Policy NE6 Coastal Development.

Change suggested by respondent:

■ No change to Plan.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

MAC 071

Support

Summary of representations:

■ Support MAC 071 in relation to Policy E7 Coastal Change Management Area – Residential Development

Summary of representation changes to plan:

■ No change to the Plan.

Response:

■ Support welcomed.

Action:

■ No change to the Plan.

6062

Support

Document Element: MAC 071

Respondent: Natural Resources Wales

Summary:

■ Support MAC 071 in relation to Policy E7 Coastal Change Management Area – Residential Development

Change suggested by respondent:

■ No change to Plan.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

MAC 075

Support

Summary of representations:

■ Support MAC 075 in relation to Policy BHE1 Conserving and Enhancing Landscape Character.

Summary of representation changes to plan:

■ No change to the Plan.

Response:

■ Support welcomed.

Action:

■ No change to the Plan.

6063

Support

Document Element: MAC 075

Respondent: Natural Resources Wales

Summary:

■ Support MAC 075 in relation to Policy BHE1 Conserving and Enhancing Landscape Character.

Change suggested by respondent:

■ No change to Plan.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

MAC 076

Object

Summary of representations:

Reference 'to the satisfaction of NRW' should be removed from paragraph 11.471 of the reasoned justification to Strategic Policy SP16, as the FCA must satisfy the provisions of TAN 15, and its acceptability is determined by the Local authority. In addition, for clarity 'Flood Consequences Assessment' should be used rather than 'technical evidence statement' in this paragraph.

Summary of representation changes to plan:

In paragraph 11.471, remove the words 'to the satisfaction of NRW', and use the words 'Flood Consequences Assessment' rather than 'technical evidence statement'.

Response:

Agree on both parts of the representation.

Action:

Replace the words 'to the satisfaction of NRW' in paragraph 11.471 with the words 'to satisfy the provisions of TAN 15.

Replace the words 'technical evidence statement' within paragraph 11.471 with 'Flood Consequence Assessment.'

6053

Object

Document Element: MAC 076

Respondent: Natural Resources Wales

Summary:

Strategic Policy – SP16: Climate Change Paragraph 11.471:

Reference “to the satisfaction of NRW” should be removed, as the FCA must satisfy the provisions of TAN 15, and its acceptability is determined by the Local authority.

In addition you propose the following wording “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” - for clarity “Flood Consequences Assessment” should be used rather than “technical evidence statement”.

Change suggested by respondent:

Amend Paragraph 11.471 as set out above.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

MAC 080

Support

Summary of representations:

Support for Policy CCH4

Summary of representation changes to plan:

No change to the Plan

Response:

Support welcomed

Action:

No action.

6023

Support

Document Element: MAC 080

Respondent: Natural Resources Wales

Summary:

We note and support the various policy amendments to include specific cross referencing to Policy CCH4 within the MACs. This approach is consistent with the point raised for consideration in the WG Examination Statement i.e. the 'need to signpost other policy areas within the RLDP that are necessary to ensure that there is no adverse effect on the integrity of nutrient sensitive protected sites'.

Change suggested by respondent:

No change to Plan.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

6024

Support

Document Element: MAC 080

Respondent: Natural Resources Wales

Summary:

We note that Policy CCH4, as proposed by the MACs, would retain a generic Habitats Regulations approach, requiring that development does not adversely affect the integrity of European sites. Previously this approach was proposed specifically for riverine SACs; MAC 080 proposes to extend coverage to 'nutrient sensitive protected sites'. We are satisfied that this approach remains appropriate in principle.

Change suggested by respondent:

No change to Plan.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

Object

Summary of representations:

The Afon Tywi and Afon Teifi Nutrient Neutrality Plan is referred to in paragraph 11.514 and others that follow. Paragraph 11.514 states 'The document sets out a range of measures, which have been agreed in consultation with NRW'. We wish to clarify that to date we have not provided any formal comments on the Plan.

Summary of representation changes to plan:

To avoid confusion, the reference to agreement with NRW should be removed from this paragraph.

Response:

Noted. The Nutrient Neutrality Action Plan represents a component of the Plan's evidence base as set out in para 11.514 and was not subject to formal consultation as part of the preparation of the revised LDP. However, as part of evidence and given the technical and regulatory components underpinning the issue of nutrients it was prepared with reference to, and engagement with various partners including the regulators. The authority recognises the consultation / engagement was not part of the LDP process therefore endorses the removal of the reference from paragraph 11.514.

Action:

Remove the reference to agreement with NRW from paragraph 11.514 in recognition that the Nutrient Neutrality Action Plan was not consulted on as part of the revised LDPs preparatory process.

6025

Object

Document Element: MAC 080

Respondent: Natural Resources Wales

Summary:

The Afon Tywi and Afon Teifi Nutrient Neutrality Plan is referred to in paragraph 11.514 and others that follow. Paragraph 11.514 states 'The document sets out a range of measures, which have been agreed in consultation with NRW'. We wish to clarify that to date we have not provided any formal comments on the Plan. Recent correspondence from your Authority confirms that the Plan is '...background evidence to support policy CCH4 and the Revised LDP and has not formed part of an LDP consultation itself'. Therefore, to avoid confusion, the reference to agreement with NRW should be removed from this paragraph.

Change suggested by respondent:

Reference to agreement with NRW should be removed from paragraph 11.514 (and others that follow).

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

Object

Summary of representations:

There is some confusion in regard to the reference to two documents [relating to nutrient neutrality] within the reasoned justification to Policy CCH4.

Summary of representation changes to plan:

We advise that all references in the Plan in the supporting text are checked, and amended as needed, to refer to the correct document.

Response:

Noted. In the interest of accuracy the Council recognises that paragraph 11.514 should be amended to reflect the name of the correct document.

Action:

Amend the Plan to remove reference to Afon Tywi and Afon Teifi within the title of the Nutrient Neutrality Action Plan.

6027

Object

Document Element: MAC 080

Respondent: Natural Resources Wales

Summary:

With regards to the Plan itself, your authority has provided us with two web links for this document. However, neither links to a document titled 'Afon Tywi and Afon Teifi Nutrient Neutrality Plan'. One link leads to a document titled Carmarthenshire County Council Nutrient Neutrality Action Plan Technical Report dated March 2024. The other link is to a document titled Carmarthenshire Nutrient Management Strategy - Achieving Nutrient Neutrality & Beyond dated March 2024. Although both documents were produced by Arcadis, they have different authors and differ in length. For the purposes of the LDP, it is vital to ensure that the document referenced in the explanatory text is correct, to avoid confusion in future. We therefore advise that all references to the Plan in the supporting text are checked, and amended as needed, to refer to the correct document.

Change suggested by respondent:

All references to the [Arcadis produced] document in the supporting text need to refer to the correct document.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

Object

Summary of representations:

We are concerned that the new paragraph after 11.512 may not provide adequate explanation regarding the issues of capacity at wastewater treatment works and could be misunderstood.

Summary of representation changes to plan:

To provide greater clarity, we suggest the new paragraph is amended as follows:

'Within the hydrological catchment area designated for Riverine SACs, development will be required to demonstrate no adverse effect on the integrity of nutrient sensitive SACs. For development creating wastewater discharges, there will be a requirement to demonstrate there is capacity within the environmental permit limits set at the Wastewater Treatment Works to which it drains, taking account of fair share principles within the catchment into which the Works discharges. In doing so, development should not lead to any deterioration to a SAC failing to meet phosphorus targets or delay the achievement of meeting its conservation objectives.'

Where evidence demonstrates that adverse effects on the integrity of SAC can be avoided or mitigated, this must be agreed with the planning authority on a case-by-case basis, in consultation with NRW.'

Response:

Agreed.

Action:

Amend new paragraph in accordance with that proposed by the respondent.

6028

Object

Document Element: MAC 080

Respondent: Natural Resources Wales

Summary:

We are concerned that the new paragraph after 11.512 may not provide adequate explanation regarding the issues of capacity at wastewater treatment works and could be misunderstood. To provide greater clarity, we suggest the new paragraph is amended as follows:

'Within the hydrological catchment area designated for Riverine SACs, development will be required to demonstrate no adverse effect on the integrity of nutrient sensitive SACs. For development creating wastewater discharges, there will be a requirement to demonstrate there is capacity within the environmental permit limits set at the Wastewater Treatment Works to which it drains, taking account of fair share principles within the catchment into which the Works discharges. In doing so, development should not lead to any deterioration to a SAC failing to meet phosphorus targets or delay the achievement of meeting its conservation objectives.'

'Where evidence demonstrates that adverse effects on the integrity of SAC can be avoided or mitigated, this must be agreed with the planning authority on a case-by-case basis, in consultation with NRW.'

Change suggested by respondent:

Amend wording of new paragraph as set out above.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

Object

Summary of representations:

In relation to the phasing of development (Burry Inlet Inner and Milford Haven Inner catchments), we believe there should be additional clarity provided in the explanatory text regarding the need to align delivery of development with environmental capacity.

Summary of representation changes to plan:

We suggest adding additional text at the end of the MAC 080 paragraph that begins 'To support and facilitate delivery of development...' as follows:

"In applying this approach, development proposals will be considered in the context of the availability of environmental capacity and the delivery of mitigation measures. Where necessary, proposals may need to be brought forward in a manner that reflects the timing of mitigation delivery, to ensure that no adverse effect on site integrity arises."

Response:

The Council notes the point that delivery of development should be aligned with environmental capacity and the timing of mitigation. The Council acknowledges that the strategic mitigation Action Plan in relation to the marine SAC remain under development, however this will also be supplemented by developer-led mitigation packages that are designed to release development. It is implicit given the relationship between mitigation, environmental capacity, and the delivery of development that phasing may on certain sites be required. In this respect phasing in itself will be on a case-by-case basis and the inclusion of a blanket statement would be superfluous and unnecessary.

Action:

No change to the Plan.

6031

Object

Document Element: MAC 080

Respondent: Natural Resources Wales

Summary:

In relation to the phasing of development (Burry Inlet Inner and Milford Haven Inner catchments), We believe there should be additional clarity provided in the explanatory text regarding the need to align delivery of development with environmental capacity. This would be consistent with the point raised for consideration in the WG Examination Statement i.e.

'...phasing and delivery of growth contained within the RLDP to ensure it is within sustainable locations and reflects the 'lead in times' necessary to ensure compliance with achieving NN targets'.

Change suggested by respondent:

Change wording as set out above.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

Object

Summary of representations:

Amend the policy wording of CCH4 in the paragraph beginning with 'Development will only be permitted ...'

Summary of representation changes to plan:

The second sentence should read: 'Where appropriate, development will be required to...'

Response:

Noted. The Council would accept the inclusion of the comma after the words 'Where appropriate'

Action:

Insert the comma after the words 'Where appropriate'

6032

Object

Document Element: MAC 080

Respondent: Natural Resources Wales

Summary:

Amend policy wording of CCH4 in the following paragraph:

The second sentence should read: 'Where appropriate, development will be required to...'

Change suggested by respondent:

Amend Policy wording as set out above.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

Object

Summary of representations:

In the interests of clarity, amend wording in the last sentence of paragraph 11.513 in the reasoned justification of Policy CCH4.

Summary of representation changes to plan:

Amend wording in the last sentence of paragraph 11.513 to read:

"Updated NRW Guidance now advises on constraints to development planning in relation to both phosphorus and nitrogen impacts within river SAC catchments."

Response:

The Council agrees that NRW's suggested rewording would improve the accuracy of the supporting text by reflecting that updated NRW Guidance now addresses both phosphorus and nitrogen impacts within river SAC catchments.

Action:

Amend the wording with paragraph 11.513 to reflect the representation.

6033

Object

Document Element: MAC 080

Respondent: Natural Resources Wales

Summary:

Amend wording in the last sentence of paragraph 11.513 to read:

“Updated NRW Guidance now advises on constraints to development planning in relation to both phosphorus and nitrogen impacts within river SAC catchments.”

Change suggested by respondent:

Amend wording as set out above.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

Object

Summary of representations:

In the interests of clarity, we suggest paragraph 11.515 in the reasoned justification of Policy CCH4 is updated to refer to the West Wales NMB.

Summary of representation changes to plan:

Refer to the West Wales NMB in paragraph 11.515.

Response:

The Council agrees that reference to the West Wales NMB at paragraph 11.515 would improve accuracy.

Action:

Amend the reference to the West Wales NMB within paragraph 11.515.

6034

Object

Document Element: MAC 080

Respondent: Natural Resources Wales

Summary:

We suggest paragraph 11.515 is updated to refer to the West Wales NMB.

Change suggested by respondent:

Amend wording in paragraph 11.515 as set out above.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

Object

Summary of representations:

In the interests of clarity, for the first new paragraph proposed in the section titled 'Marine', in the reasoned justification for Policy CCH4, we suggest that some changes to the wording are required.

Summary of representation changes to plan:

Amend wording for the first new paragraph proposed in the section titled 'Marine', as follows:

'The marine SACs in Wales have a number of qualifying features including estuaries, coastal lagoons, large shallow inlets and bays and mudflats/sandflats that are sensitive to high levels of nutrients.'

The updated condition assessments undertaken by NRW and published in June 2025 identified that nutrient sensitive features at some designated sites had reached an unfavourable condition for Dissolved Inorganic Nitrogen [DIN]), phytoplankton and opportunistic macroalgae. These are chemical and biological indicators of nitrogen enrichment.'

Response:

The Council agrees that NRW's suggested edits would improve the accuracy and clarity of the first paragraph of the 'Marine' section.

Action:

Amend the new first paragraph under the title Marine.

6035

Object

Document Element: MAC 080

Respondent: Natural Resources Wales

Summary:

For the first new paragraph proposed in the section titled 'Marine', we suggest the following edits:

'The marine SACs in Wales have a number of qualifying features including estuaries, coastal lagoons, large shallow inlets and bays and mudflats/sandflats that are sensitive to high levels of nutrients. The updated condition assessments undertaken by NRW and published in June 2025 identified that nutrient sensitive features at some designated sites had reached an unfavourable condition for Dissolved Inorganic Nitrogen [DIN], phytoplankton and opportunistic macroalgae. These are chemical and biological indicators of nitrogen enrichment.'

Change suggested by respondent:

Amend the wording as set out above.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

Object

Summary of representations:

In the interests of clarity, an amendment to the wording is suggested in the second new paragraph proposed in the section titled 'Marine' in the reasoned justification of Policy CCH4.

Summary of representation changes to plan:

In the second new paragraph proposed in the section titled 'Marine', the following words should be deleted: 'Nutrient Neutrality Area for Nitrogen associated with'.

Response:

The Council agrees the suggested deletion would improve clarity.

Action:

Remove the words 'Nutrient Neutrality Area for Nitrogen associated with' from the 2nd paragraph under the title 'Marine' in the reasoned justification of Policy CCH4.

6036

Object

Document Element: MAC 080

Respondent: Natural Resources Wales

Summary:

In the second new paragraph proposed in the section titled 'Marine', the following words should be deleted: 'Nutrient Neutrality Area for Nitrogen associated with'.

Change suggested by respondent:

Amend wording as set out above.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

Object

Summary of representations:

In the interests of clarity, the third, fourth and fifth paragraphs proposed in the section titled 'Marine' in the reasoned justification of Policy CCH4 should be redrafted.

Summary of representation changes to plan:

Changes not specified.

Response:

Disagree. The content of the paragraphs are sufficiently clear and the respondent has failed to provide alternate wording and clarity.

Action:

No change to the Plan.

6037

Object

Document Element: MAC 080**Respondent:** Natural Resources Wales**Summary:**

The third, fourth and fifth paragraphs proposed in the section titled 'Marine' should be redrafted. In parts, they are difficult to read and lack clarity.

Change suggested by respondent:

Redraft the paragraphs set out above.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

Object

Summary of representations:

In the interests of clarity, we suggest rewording the fifth paragraph of the section titled 'Marine' in the reasoned justification of Policy CCH4 in reference to surface water removal (which links to Policy INF4).

Summary of representation changes to plan:

Reword the reference to surface water removal in the fifth paragraph of the reasoned justification of Policy CCH4 to advise that:

'...developers proposals may wish to consider also introduce the removal of surface water as a mitigation measure...'

Response:

The Council agrees with the proposed wording in that it offers additional clarity and meaning

Action:

In the 6th new paragraph under the title 'Marine' within the reasoned justification of Policy CCH4, replace the words 'proposals may wish to also introduce the removal of surface water as a mitigation measure with,

"...developers proposals may wish to consider also introduce the removal of surface water as a mitigation measure..."

6038

Object

Document Element: MAC 080**Respondent:** Natural Resources Wales**Summary:**

With regards to the fifth paragraph and the reference to surface water removal (which links to Policy INF4) we suggest this is reworded to advise that

'...developers may wish to consider also the removal of surface water as a mitigation measure...'

While surface water removal from a combined sewer may reduce the frequency and duration of sewer overflow, further work is required to determine the nutrient reduction benefits of such measures and therefore it may be premature to include the text as currently drafted.

Change suggested by respondent:

Amend wording as set out above.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

Object

Summary of representations:

In the interests of clarity, amend the seventh paragraph in the section titled 'Marine' in the reasoned justification of Policy CCH4.

Summary of representation changes to plan:

Amend the seventh paragraph in the reasoned justification of Policy CCH4 as follows:

'The geographical extent of the catchment draining to the Burry Inlet Inner and Milford Haven Inner can be identified using the latest NRW layer as contained on DataMapWales.'

Response:

The Council agrees with the proposed change in the interest of accuracy.

Action:

Amend the seventh paragraph in the reasoned justification of Policy CCH4 as follows:

'The geographical extent of the catchment draining to the Burry Inlet Inner and Milford Haven Inner can be identified using the latest NRW layer as contained on DataMapWales.'

6042

Object

Document Element: MAC 080**Respondent:** Natural Resources Wales**Summary:**

The sixth paragraph should be amended as follows:

'The geographical extent of the catchment draining to the Burry Inlet Inner and Milford Haven Inner can be identified using the latest NRW layer as contained on DataMapWales.'

Change suggested by respondent:

Amend wording as set out above.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

Object

Summary of representations:

In the interests of clarity, the seventh (and final) paragraph in the section title 'Marine' in the reasoned justification of Policy CCH4 should be amended and simplified.

Summary of representation changes to plan:

Amend the final paragraph in the section title 'Marine' in the reasoned justification of Policy CCH4 as follows:

The Council has produced (and is continually developing) a library of resources to assist developers when considering proposals that drain into a marine or riverine SAC. These open access resources are regularly updated and can be accessed via the CCC website. The Welsh Government's All Wales Nutrient Budget calculator, and Mitigation Guidance (published June 2023) are available for developers and remain the only catchment specific tools available in Wales.

Response:

Agree in part.

The Council agrees with the amendment proposed by the respondent. However, in light of the publication of the DIN handbook the paragraph as proposed by the respondent will need to be amended to reflect the availability of this resource to developers and other interested parties.

Action:

Replace the new paragraph (paragraph 8) under 'Marine' with the reasoned justification for Policy CCH4, in addition to a reference to the publication of the DIN handbook as follows:

'The Council has produced (and is continually developing) a library of resources to assist developers when considering proposals that drain into a marine or riverine SAC, including the Marine and Estuarine Mitigation Strategy Developer Handbook (March 2026). These open access resources are regularly updated and can be accessed via the CCC website. The Welsh Government's All Wales Nutrient Budget calculator, and Mitigation Guidance (published June 2023) are available for developers and remain the only catchment specific tools available in Wales.'

6045

Object

Document Element: MAC 080

Respondent: Natural Resources Wales

Summary:

The seventh (and final) paragraph in that section should be amended and simplified as follows:

'The Council has produced (and is continually developing) a library of resources to assist developers when considering proposals that drain into a marine or riverine SAC. These open access resources are regularly updated and can be accessed via the CCC website. The Welsh Government's All Wales Nutrient Budget calculator, and Mitigation Guidance (published June 2023) are available for developers remain the only catchment specific tools available in Wales.

Change suggested by respondent:

Amend wording as set out above.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

Object

Summary of representations:

For consistency and clarity, we advise the spelling of phosphorus is corrected throughout the rLDP (i.e. all references should be to phosphorus, not phosphorous or phosphates).

Summary of representation changes to plan:

All references to phosphorus should be corrected throughout the Plan (i.e. all references should be to phosphorus, not phosphorous or phosphates).

Response:

Noted. This will be undertaken as part of the Minor Editorial Changes.

Action:

To amend the Plan as appropriate.

6049

Object

Document Element: MAC 080

Respondent: Natural Resources Wales

Summary:

For consistency and clarity, we advise the spelling of phosphorus is corrected throughout the rLDP (i.e. all references should be to phosphorus, not phosphorous or phosphates).

Change suggested by respondent:

Amend references to phosphorus throughout the Plan as set out above.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

Comment

Summary of representations:

Welcome the continued collaborative partnership work with NMBs and remain committed to the 'fair share' approach through our phosphorus investment plan.

DCWW will continue to comment on the capacity of WwTWs alongside confirmation of its compliance with permit conditions.

DCWW is undertaking its source apportionment modelling programme which is programmed to conclude in Spring 2027 and will be important to ensure any mitigation measures are aligned with the modelling findings.

Welcome the addition of a new paragraph to reflect the requirements of TAN, and the production of an SPG to support this Policy

Summary of representation changes to plan:

No change to the Plan.

Response:

Noted and support welcomed

Action:

No change to the Plan.

5967

Comment

Document Element: MAC 080

Respondent: Dwr Cymru/Welsh Water

Summary:

We welcome the continued collaborative partnership work with NMBs and remain committed to the 'fair share' approach through our phosphorus investment plan. We will continue to comment on the capacity of WwTWs alongside confirmation of its compliance with permit conditions.

DCWW is undertaking its source apportionment modelling programme which is programmed to conclude in Spring 2027 and will be important to ensure any mitigation measures are aligned with the modelling findings.

We welcome the addition of a new paragraph to reflect the requirements of TAN, and the production of an SPG to support this Policy

Change suggested by respondent:

-

Attachments: None

Comment

Summary of representations:

The respondent supports the principle of the proposed amendments and acknowledges that development will only be permitted where it can be demonstrated that there would be no adverse effect on the integrity of nutrient-sensitive protected sites and, where necessary, proposals may be required to achieve nutrient neutrality.

It is noted that the supporting text confirms that the Council is preparing developer-led mitigation guidance/toolkits together with strategic mitigation guidance and a focused Action Plan to assist in addressing nutrient impacts arising from future development. The respondent supports this solution orientated approach, recognising that suitable nutrient mitigation is most effectively achieved through a layered and flexible mitigation strategy. Whilst this work remains ongoing, it is important that opportunities to bring forward strategic mitigation measures are progressed as quickly as possible, drawing upon public capital programmes and other available funding mechanisms where appropriate. The timely delivery of strategic solutions will provide greater certainty to developers, support confidence in the planning process and help facilitate the delivery of much-needed housing without unnecessary delay.

BR welcomes the Council's commitment to preparing mitigation guidance and considers it essential that this provides applicants with access to a broad range of mitigation options that can be considered on a case-by-case basis. In particular, opportunities to achieve nutrient mitigation should be considered through a combination of different options. Whilst not intending to repeat information above this should include but not limited to:

- design-led mitigation measures;
- utilisation of existing headroom and permit capacity associated with the relevant Wastewater Treatment Works (WwTW); and
- strategic mitigation solutions capable of addressing additional nutrient loading arising from future development.

From a practical perspective, this approach should theoretically enable applicants to identify and implement the most appropriate mitigation measures, either individually or as part of a package of interventions, incorporating both on-site and off-site opportunities, including surface water removal where appropriate.

In circumstances where development drains directly to a Wastewater Treatment Works that discharges into a nutrient-sensitive freshwater catchment and nutrient neutrality is required, the removal of surface water from the combined sewer network should also be recognised as a potential mitigation measure capable of assisting in reducing nutrient loading. It is important that the proposed policy aligns with the requirements of Policy INF4 to ensure consistency across the Plan, avoid duplication and provide sufficient flexibility to demonstrate the RLDP is capable of meeting local housing need in accordance with Test 2 of the DPM.

Summary of representation changes to plan:

No change to the Plan

Response:

Comments noted.

Action:

No change to the Plan.

6022

Comment

Document Element: MAC 080

Respondent: Ms Zoe Aubery

Agent: Boyer Planning

Summary:

BR supports the principle of the proposed amendments and acknowledges that development will only be permitted where it can be demonstrated that there would be no adverse effect on the integrity of nutrient-sensitive protected sites and, where necessary, proposals may be required to achieve nutrient neutrality.

It is noted that the supporting text confirms that the Council is preparing developer-led mitigation guidance/toolkits together with strategic mitigation guidance and a focused Action Plan to assist in addressing nutrient impacts arising from future development. BR supports this solution orientated approach, recognising that suitable nutrient mitigation is most effectively achieved through a layered and flexible mitigation strategy. Whilst this work remains ongoing, it is important that opportunities to bring forward strategic mitigation measures are progressed as quickly as possible, drawing upon public capital programmes and other available funding mechanisms where appropriate. The timely delivery of strategic solutions will provide greater certainty to developers, support confidence in the planning process and help facilitate the delivery of much-needed housing without unnecessary delay.

BR welcomes the Council's commitment to preparing mitigation guidance and considers it essential that this provides applicants with access to a broad range of mitigation options that can be considered on a case-by-case basis. In particular, opportunities to achieve nutrient mitigation should be considered through a combination of different options. Whilst not intending to repeat information above this should include but not limited to:

- design-led mitigation measures;
- utilisation of existing headroom and permit capacity associated with the relevant Wastewater Treatment Works (WwTW); and
- strategic mitigation solutions capable of addressing additional nutrient loading arising from future development.

From a practical perspective, this approach should theoretically enable applicants to identify and implement the most appropriate mitigation measures, either individually or as part of a package of interventions, incorporating both on-site and off-site opportunities, including surface water removal where appropriate.

In circumstances where development drains directly to a Wastewater Treatment Works that discharges into a nutrient-sensitive freshwater catchment and nutrient neutrality is required, the removal of surface water from the combined sewer network should also be recognised as a potential mitigation measure capable of assisting in reducing nutrient loading. It is important that the proposed policy aligns with the requirements of Policy INF4 to ensure consistency across the Plan, avoid duplication and provide sufficient flexibility to demonstrate the RLDP is capable of meeting local housing need in accordance with Test 2 of the DPM.

Change suggested by respondent:

No change to the Plan

Attachments:

Cover email - <https://carmarthenshire.oc2.uk/a/6zn>

Representation form - <https://carmarthenshire.oc2.uk/a/6zy>

Full representation form - <https://carmarthenshire.oc2.uk/a/6zp>

Object

Summary of representations:

This representation comprises a generic objection to the MACs and HRA and calls for the progression of the Revised Carmarthenshire Local Development Plan (LDP) 2018 – 2033 to be paused.

It is submitted that the plan cannot currently meet the statutory 'tests of soundness', specifically regarding Test 2 (Appropriateness) and Test 3 (Deliverability), until the outstanding Habitats Regulations Assessment (HRA) issues

concerning Special Areas of Conservation (SAC) nutrient failures are fully resolved, with absolute legal and scientific certainty.

Proceeding with the LDP under the current climate of regulatory uncertainty, potentially means the adoption of a fundamentally flawed and legally vulnerable document. The current trajectory of the LDP will result in significant land use vulnerabilities and considerable economic risk.

Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017, the Council, and by extension PEDW during examination, must act as the "competent authority." The law mandates that a land use plan can only be given effect if it has been established that it will not adversely affect the integrity of a European site, either alone or in combination with other plans or projects.

This representation is made within the context of:-

- i) the Precautionary Principle: The European Court of Justice (ECJ) case law dictates that an appropriate assessment cannot rely on speculative, future, or unproven mitigation measures.
- ii) the Carmarthenshire Context: Significant portions of the LDP's growth allocations fall within the nitrate affected river catchments.

As the strategic framework to definitively offset these nutrients is not yet fully operational, the HRA accompanying this LDP cannot eliminate reasonable scientific doubt. Therefore, the plan fails the fundamental legal threshold required by the Habitats Regulations.

An HRA must account for in-combination effects - allocating thousands of new homes and commercial sites while river systems are failing their nutrient targets, and while marine catchments face strict requirements for nitrate neutrality, creates an irreconcilable statutory conflict.

Advancing a plan that relies on 'speculative' or as yet unproven mitigation strategies, fails the precautionary principle enshrined in environmental law and leaves the LDP highly vulnerable to successful judicial review.

At the recent 'LDP2 Exploratory Meeting' convened by Pembrokeshire County Council, evidence was presented which suggested that a policy framework for dealing with nitrates would be available by the spring of 2027. For the sake of a few months, would it not be prudent to await this framework, in order to obtain a full and complete understanding of the expected costs for each affected housing site, which will have implications for affordable housing provision viability, etc.?

To be declared "sound", an LDP must be realistic and deliverable. Currently, a significant portion of the proposed housing sites are in the south of the county and are impeded by nutrient-sensitive river catchments.

The LDP therefore fails on the following tests of soundness. The LDP cannot be deemed 'appropriate' if many of its core housing and employment allocations conflict directly with statutory environmental duties. By allocating growth in areas where wastewater treatment works lack the capacity or mechanism to strip nutrients to permissible levels, there is a considerable risk of further ecological degradation of protected waters.

In terms of 'deliverability' and to be deemed 'sound', the LDP must be realistic and deliverable over the plan period. The 'nutrient budget calculator' is a tool that merely quantifies the problem - it does not provide a universal panacea. In the absence of functional, catchment-wide strategic mitigation, such as integrated wetlands or sewerage infrastructure upgrades, subsequent residential planning applications, within these affected catchments will likely fail the 'Appropriate Assessment' stage. Transferring these unresolved issues to developers at the planning application stage will completely stall delivery, rendering the LDP's housing strategy undeliverable.

A procedural pause is considered necessary, at least until the Welsh Government working group(s) has published its findings. A failure to temporarily pause matters may result in post-adoption legal challenge and would exacerbate market uncertainty. It is important to ensure that the Welsh Government working group findings are properly integrated with the LDP's infrastructure delivery plan.

In conclusion, the Inspectors are respectfully requested to exercise their procedural authority to pause the LDP process until a definitive, strategic mitigation mechanism can be implemented and a revised HRA, compatible with achieving nutrient neutrality/reduction across the affected SAC catchment, is in place.

Progressing the LDP while nitrate SAC issues remain unresolved is a high-risk option that impacts legal soundness and

ecological responsibility.

The fundamental development plan principle of providing informed guidance and certainty for developers will regrettably be significantly undermined.

Summary of representation changes to plan:

Pause the Plan's preparation.

Response:

Noted. The Plan, and its supporting document including the HRA have been subject to an ongoing examination which seeks to consider a range of matters including the tests of soundness. Whilst the comments in relation to nitrates is noted the Council has sought to provide the Inspectors with supporting clarity and information to enable them to consider the matters with appropriate confidence. It is also noted that the WG have provided as part of the examination a statement in relation to nutrients and notably soundness test 3 clarification on the 12th January 2026.

Action:

No change to the Plan.

6010

Object

Document Element: MAC 080

Respondent: JCR Planning Ltd

Summary:

This representation comprises a generic objection to the MACs and HRA and calls for the progression of the Revised Carmarthenshire Local Development Plan (LDP) 2018 – 2033 to be paused.

It is submitted that the plan cannot currently meet the statutory 'tests of soundness', specifically regarding Test 2 (Appropriateness) and Test 3 (Deliverability), until the outstanding Habitats Regulations Assessment (HRA) issues concerning Special Areas of Conservation (SAC) nutrient failures are fully resolved, with absolute legal and scientific certainty.

Proceeding with the LDP under the current climate of regulatory uncertainty, potentially means the adoption of a fundamentally flawed and legally vulnerable document. The current trajectory of the LDP will result in significant land use vulnerabilities and considerable economic risk.

Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017, the Council, and by extension PEDW during examination, must act as the "competent authority." The law mandates that a land use plan can only be given effect if it has been established that it will not adversely affect the integrity of a European site, either alone or in combination with other plans or projects.

This representation is made within the context of:-

i)

the Precautionary Principle: The European Court of Justice (ECJ) case law dictates that an appropriate assessment cannot rely on speculative, future, or unproven mitigation measures.

ii)

the Carmarthenshire Context: Significant portions of the LDP's growth allocations fall within the nitrate affected river catchments.

As the strategic framework to definitively offset these nutrients is not yet fully operational, the HRA accompanying this LDP cannot eliminate reasonable scientific doubt. Therefore, the plan fails the fundamental legal threshold required by the Habitats Regulations.

An HRA must account for in-combination effects - allocating thousands of new homes and commercial sites while river systems are failing their nutrient targets, and while marine catchments face strict requirements for nitrate neutrality, creates an irreconcilable statutory conflict.

Advancing a plan that relies on 'speculative' or as yet unproven mitigation strategies, fails the precautionary principle enshrined in environmental law and leaves the LDP highly vulnerable to successful judicial review.

At the recent 'LDP2 Exploratory Meeting' convened by Pembrokeshire County Council, evidence was presented which suggested that a policy framework for dealing with nitrates would be available by the spring of 2027. For the sake of

a few months, would it not be prudent to await this framework, in order to obtain a full and complete understanding of the expected costs for each affected housing site, which will have implications for affordable housing provision viability, etc.?

To be declared "sound", an LDP must be realistic and deliverable. Currently, a significant portion of the proposed housing sites are in the south of the county and are impeded by nutrient-sensitive river catchments.

The LDP therefore fails on the following tests of soundness. The LDP cannot be deemed 'appropriate' if many of its core housing and employment allocations conflict directly with statutory environmental duties. By allocating growth in areas where wastewater treatment works lack the capacity or mechanism to strip nutrients to permissible levels, there is a considerable risk of further ecological degradation of protected waters.

In terms of 'deliverability' and to be deemed 'sound', the LDP must be realistic and deliverable over the plan period.

The 'nutrient budget calculator' is a tool that merely quantifies the problem - it does not provide a universal panacea.

In the absence of functional, catchment-wide strategic mitigation, such as integrated wetlands or sewerage infrastructure upgrades, subsequent residential planning applications, within these affected catchments will likely fail the 'Appropriate Assessment' stage. Transferring these unresolved issues to developers at the planning application stage will completely stall delivery, rendering the LDP's housing strategy undeliverable.

A procedural pause is considered necessary, at least until the Welsh Government working group(s) has published its findings. A failure to temporarily pause matters may result in post-adoption legal challenge and would exacerbate market uncertainty. It is important to ensure that the Welsh Government working group findings are properly integrated with the LDP's infrastructure delivery plan.

In conclusion, the Inspectors are respectfully requested to exercise their procedural authority to pause the LDP process until a definitive, strategic mitigation mechanism can be implemented and a revised HRA, compatible with achieving nutrient neutrality/reduction across the affected SAC catchment, is in place.

Progressing the LDP while nitrate SAC issues remain unresolved is a high-risk option that impacts legal soundness and ecological responsibility.

The fundamental development plan principle of providing informed guidance and certainty for developers will regrettably be significantly undermined.

Change suggested by respondent:

-

Attachments:

Email redacted - <https://carmarthenshire.oc2.uk/a/6zz>

Representation redacted - <https://carmarthenshire.oc2.uk/a/6zm>

Comment

Summary of representations:

Welcome the continued collaborative partnership work with NMBs and remain committed to the 'fair share' approach through our phosphorus investment plan.

DCWW will continue to comment on the capacity of WwTWs alongside confirmation of its compliance with permit conditions.

DCWW is undertaking its source apportionment modelling programme which is programmed to conclude in Spring 2027 and will be important to ensure any mitigation measures are aligned with the modelling findings.

Welcome the addition of a new paragraph to reflect the requirements of TAN, and the production of an SPG to support this Policy

Summary of representation changes to plan:

No change to the Plan.

Response:

Noted and support welcomed

Action:

No change to the Plan

5993**Comment**

Document Element: MAC 080

Respondent: Dwr Cymru/Welsh Water

Summary:**MAC 080 CCH4: Water Quality and Protection of Water Resources**

As highlighted in our original comments, we welcome the inclusion of Policy CCH4 and acknowledge that these amendments (MAC 080) propose to amalgamate the impact of development on nutrient sensitive protected sites, to substitute phosphorous sensitive riverine SACs. We defer to NRW's 'Advice to planning authorities for planning applications affecting nutrient sensitive Special Areas of Conservation' to determine which development will be required to achieve nutrient neutrality and remind that DCWW is a statutory consultee for most planning applications. With reference to the amendments to Paragraphs 11.513 to 11.515 ('Riverine'), we acknowledge the variety of strategic and developer-led mitigatory actions and welcome the continued collaborative partnership work with NMBs. DCWW remain committed to the 'fair share' approach, as defined by Welsh Government's practical guidance for public authorities (DTA Ecology), through our phosphorus investment plan to remove 90% of the phosphorous load from WwTWs discharging to failing SAC rivers. In accordance with NRW's planning advice, we will continue to comment on the capacity of WwTWs to treat foul water flows alongside confirmation of its compliance with permit conditions, including effective dates as identified by the review of permits. Aside of the permit headroom capacity, we defer to the Council's Action Plan to identify any further measures to mitigate against any increasing nutrient loads in the river.

We acknowledge a separate sub-heading for 'Marine', including requirements to achieve nutrient neutrality within the Burry Inlet Inner and Milford Haven Inner freshwater catchments. We would advise the Council that most site locations within are likely to discharge into these catchments; however, it should also be noted that some sites may be located outside but ultimately drain via a sewerage network into the affected freshwater catchment. For example, Burry Port is located outside but comprises of a sewerage network which drains to Llanelli Coastal WwTW and therefore discharges into the Burry Inlet Inner. Similarly, albeit rarely, there are site locations located within but discharge to a sewerage network outside of the freshwater catchment and examples of sites that are on the periphery of networks within and outside. For completeness, we refer to NRW's latest planning advice and recognise DCWW's duty to confirm which WwTW the site would connect to and its compliance with permit conditions.

We acknowledge the Council's intention to produce "multilayered" guidance for strategic and developer led mitigation for developments in the freshwater catchments and we would advocate for close collaboration with DCWW on this approach, particularly if it relates to any public sewerage assets. On this point, DCWW is undertaking its source apportionment modelling programme which is programmed to conclude in Spring 2027 and will be important to ensure any mitigation measures are aligned with the modelling findings. As highlighted above (MAC 036), we remind that surface water removal may not secure nutrient neutrality but could be considered as part of the mitigation strategy. We note the Council's proposal to produce a library of resources to assist developers in this matter, alongside external sources, and welcome the intention to regularly update the library which can align to any further updates in NRW's planning advice.

Lastly, we welcome the addition of a new paragraph to reflect the requirements of TAN 15 and advocate for early engagement with the SAB and any other stakeholder, including DCWW, where the drainage proposals will have an impact on their interests. We also welcome the production of an SPG to support this Policy, in relation to a nutrient mitigation toolkit alongside the aforementioned 'Burry Inlet' SPG to consider sustainable management of surface water drainage.

Change suggested by respondent:

-

Attachments:

Written Response - <https://carmarthenshire.oc2.uk/a/6m4>

Cover email - <https://carmarthenshire.oc2.uk/a/6m5>

MAC 081

Support

Summary of representations:

Support MAC 081 in relation to the deletion of Policy CCH5

Summary of representation changes to plan:

No change to the Plan.

Response:

Support welcomed.

Action:

No change to the Plan.

6064

Support

Document Element: MAC 081

Respondent: Natural Resources Wales

Summary:

Support MAC 081 in relation to the deletion of Policy CCH5.

Change suggested by respondent:

No change to Plan.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

MAC 083**Support****Summary of representations:**

Support MAC 083 in relation to Policy CCH7 Climate Change – Forest, Woodland, and Tree Planting

Summary of representation changes to plan:

No change to the Plan.

Response:

Support welcomed.

Action:

No change to the Plan.

6065**Support**

Document Element: MAC 083

Respondent: Natural Resources Wales

Summary:

Support MAC 083 in relation to Policy CCH7 Climate Change – Forest, Woodland, and Tree Planting.

Change suggested by respondent:

No change to Plan.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

MAC 085**Object****Summary of representations:**

The respondent supports the principle of promoting active travel and improving opportunities for walking and cycling in accordance with national planning policy, the Active Travel (Wales) Act 2013 and wider sustainability objectives. However, suggest that amendments should be made to the proposed wording of Policy TRA2 to ensure it remains proportionate to proposed schemes and able to consistently applied when determining a range of development proposals.

Please see the respondent's full summary below.

Summary of representation changes to plan:

Amend the policy to provide further clarity when mitigation measures are required as it may currently lead to disproportionate requirements being imposed on development proposals.

Response:

The Council considers the policy provides sufficient clarity in relation to the requirements towards Active Travel provision. It should be noted that in applying the policy and seeking financial contribution or otherwise through planning obligations, the provisions of the CIL regulation and the tests contained therein, will be fully applied.

Action:

No change to the Plan.

6021

Object

Document Element: MAC 085**Respondent:** Ms Zoe Aubery**Agent:** Boyer Planning**Summary:**

Policy TRA2 seeks to support development that promotes active travel by requiring developments to provide, or contribute towards, walking and cycling infrastructure.

BR support the principle of promoting active travel and improving opportunities for walking and cycling in accordance with national planning policy, the Active Travel (Wales) Act 2013 and wider sustainability objectives. However, suggest that amendments should be made to the proposed wording of Policy TRA2 to ensure it remains proportionate to proposed scheme and able to consistently applied when determining a range of development proposals.

The policy requires development proposals to incorporate active travel infrastructure within development sites and/or make financial contributions towards off-site provision. Whilst off-site improvements may be appropriate in certain circumstances, the policy should clarify that any financial contributions will only be sought where they are directly related to the development and reasonably related in scale to the proposed scheme. Without such clarification there is a risk that the policy could result in requests for contributions towards wider network improvements that do not meet the relevant legislative tests.

From a practical standpoint if development sites are expected to contribute financially towards Active Travel scheme as mitigation measures, then the scale and mechanism of those contributions should be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy TRA2 could introduce unforeseen costs and extensive time delays, potentially affecting the plan's ability to meet its housing requirements.

Additionally, the policy states that development proposals which have a "significant adverse impact" on a Public Right of Way or existing Active Travel route will be expected to provide alternative routes. Whilst the objective of protecting and maintaining route connectivity is supported, the policy does not define what would constitute a "significant adverse impact". As drafted, the wording is open to interpretation and could result in inconsistent decision-making and uncertainty for applicants.

BR suggest that the absence of a clear definition makes it difficult for applicants to understand when mitigation measures or alternative routes will be required and may lead to disproportionate requirements being imposed on development proposals.

Finally, significant weight should be given to development proposals that retain, protect and positively integrate existing Public Rights of Way (PRoW) within their design. Schemes that incorporate and enhance established walking and cycling routes can help maintain connectivity, encourage sustainable travel, support public access to the countryside, and preserve the character and recreational value of the local area. Accordingly, proposals that successfully accommodate existing PRoW, whilst safeguarding their accessibility, safety and amenity, should be supported according and this position reflected within the overall planning balance.

Change suggested by respondent:

Change the wording within the Policy

Attachments:

Cover email - <https://carmarthenshire.oc2.uk/a/6zn>

Representation form - <https://carmarthenshire.oc2.uk/a/6zy>

Full representation form - <https://carmarthenshire.oc2.uk/a/6zp>

MAC 086

Comment

Summary of representations:

Further to the consultation on the MACs, I can confirm that MPA Wales has no additional comments to make to the consultation.

Summary of representation changes to plan:

No change to the Plan

Response:

Comments welcomed

Action:

No change to the Plan

6007

Comment

Document Element: MAC 086

Respondent: Mineral Products Association Wales

Summary:

Further to the consultation on the MACs, I can confirm that MPA Wales has no additional comments to make to the consultation.

Change suggested by respondent:

No change to the Plan

Attachments:

Cover email - <https://carmarthenshire.oc2.uk/a/6zw>

Representation - <https://carmarthenshire.oc2.uk/a/6zf>

MAC 087

Support

Summary of representations:

■ Support MAC 087 in relation to Policy MR1: Mineral Proposals

Summary of representation changes to plan:

■ No change to the Plan.

Response:

■ Support welcomed.

Action:

■ No change to the Plan.

6066

Support

Document Element: MAC 087

Respondent: Natural Resources Wales

Summary:

■ Support MAC 087 in relation to Policy MR1: Mineral Proposals.

Change suggested by respondent:

■ No change to Plan.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

MAC 090

Support

Summary of representations:

■ Support MAC 090 in relation to Strategic Policy SP19: Sustainable Waste Management

Summary of representation changes to plan:

■ No change to the Plan.

Response:

■ Support welcomed.

Action:

■ No change to the Plan.

6067

Support

Document Element: MAC 090

Respondent: Natural Resources Wales

Summary:

■ Support MAC 090 in relation to Strategic Policy SP19: Sustainable Waste Management.

Change suggested by respondent:

■ No change to Plan.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

MAC 091

Support

Summary of representations:

■ Support MAC 091 in relation to Policy WM2: Landfill Proposals

Summary of representation changes to plan:

■ No change to the Plan.

Response:

■ Support welcomed.

Action:

■ No change to the Plan.

6068

Support

Document Element: MAC 091

Respondent: Natural Resources Wales

Summary:

■ Support MAC 091 in relation to Policy WM2: Landfill Proposals.

Change suggested by respondent:

■ No change to Plan.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

MAC 110

Support

Summary of representations:

Support MAC 110 in relation to the insertion of new Monitoring Indicator after MI 42. Local Indicator Delivery of biodiversity enhancements as part of new development (where applicable)

Summary of representation changes to plan:

No change to the Plan.

Response:

Support welcomed.

Action:

No change to the Plan.

6069

Support

Document Element: MAC 110

Respondent: Natural Resources Wales

Summary:

Support MAC 110 in relation to the insertion of new Monitoring Indicator after MI 42. Local Indicator Delivery of biodiversity enhancements as part of new development (where applicable).

Change suggested by respondent:

No change to Plan.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

MAC 112

Support

Summary of representations:

Support MAC 112 in relation to the inclusion of a new Monitoring Indicator after MI. 55. Local Indicator: Publish Mitigation Strategy / Action Plan for Nutrient Neutrality in Marine SACs

Summary of representation changes to plan:

No change to the Plan.

Response:

Support welcomed.

Action:

No change to the Plan.

6070

Support

Document Element: MAC 112

Respondent: Natural Resources Wales

Summary:

Support MAC 112 in relation to the inclusion of a new Monitoring Indicator after MI. 55. Local Indicator: Publish Mitigation Strategy / Action Plan for Nutrient Neutrality in Marine SACs.

Change suggested by respondent:

No change to Plan.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

MAC 116

Support

Summary of representations:

Support MAC 116 in relation to the inclusion of new monitoring indicator under SP16. Local Indicator: Number of dwellings delivered in areas located within the catchment of nutrient impacted SACs

Summary of representation changes to plan:

No change to the Plan.

Response:

Support welcomed.

Action:

No change to the Plan.

6071

Support

Document Element: MAC 116

Respondent: Natural Resources Wales

Summary:

Support MAC 116 in relation to the inclusion of new monitoring indicator under SP16. Local Indicator: Number of dwellings delivered in areas located within the catchment of nutrient impacted SACs.

Change suggested by respondent:

No change to Plan.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

MAC 121

Object

Summary of representations:

We note that reference to river shingle shoal habitat has been removed from the M12 section. We recommend that this reference is reinstated, particularly as this section of river may be affected by future river shoal removal works

Summary of representation changes to plan:

Reinstate reference to river shoal in relation to Mineral Site M12 in Appendix 4: Mineral Sites.

Response:

Agreed in part. Reference to river shoal will provide more clarity in differentiating that it is being worked in a watercourse rather than being worked dry. However, since a river shoal is a geomorphological landform rather than a type of mineral, the wording will be placed in brackets after 'Sand and Gravel'.

Action:

Reference to river shoal will be reinstated in relation to Mineral Site M12, as follows:

Sand and Gravel (River Shoal)

6051

Object

Document Element: MAC 121

Respondent: Natural Resources Wales

Summary:

We note that reference to river shingle shoal habitat has been removed from the M12 section in Appendix 4. We recommend that this reference is reinstated, particularly as this section of river may be affected by future river shoal removal works.

Change suggested by respondent:

Reinstate reference to river shoal in relation to Mineral Site M12.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

MAC 122

Object

Summary of representations:

The respondent wholly supports the principle of proposed allocation at Heol y Mynydd, Bryn. Furthermore, we also support the proposed trajectory for the site as set out within Appendix 7 of the RLDP and remain fully committed to facilitating delivery of the site early on in the plan period which includes 40 dwellings in 2027/28 and 40 dwellings in 2028/29.

The respondent maintains that there is sufficient evidence to justify allocating Land off Heol y Mynydd, Bryn in its entirety for up to 160 dwellings.

Summary of representation changes to plan:

Amend the plan by allocating the site for 160 dwellings and not 80 dwellings.

Response:

The Council considers that the scale of the site, and in particular the housing numbers associated with the land has been subject to detailed consideration through the examination process and is consistent and appropriate to its location.

With respect to the housing trajectory and other considerations for other sites' inclusions, these have been fully considered and are updated on an annual basis.

Action:

No change to the Plan.

6014

Object

Document Element: MAC 122**Respondent:** Ms Zoe Aubery**Agent:** Boyer Planning**Summary:**

The respondent wholly supports the principle of proposed allocation at Heol y Mynydd, Bryn. Furthermore, we also support the proposed trajectory for the site as set out within Appendix 7 of the RLDP and remain fully committed to facilitating delivery of the site early on in the plan period which includes 40 dwellings in 2027/28 and 40 dwellings in 2028/29.

According to the Council's housing trajectory (Appendix 7 of the RLDP) many of the sites which have extant consents are expected to start delivering homes within the next 12 months (i.e. 2026/27 and 2027/28). This obviously raises concerns given the timescales involved with preparation, submission and determination of a planning application. Along with compliance with statutory Pre-Application Consultation (PAC) requirements, discharge of planning conditions, approval through the Sustainable Drainage Approval Body (SAB) process, and completion of any associated infrastructure agreements. Each of these stages can be time consuming and on occasions lead to significant delays in housing delivery, especially earlier on during the plan period.

In light of the above BR maintain that there is sufficient evidence to justify allocating Land off Heol y Mynydd, Bryn in its entirety for up to 160 dwellings. This approach will provide greater certainty in ensuring the emerging RLDP is able to effectively meet local housing need over the emerging plan period and the proposed housing trajectory whilst also accounting for any potential slippage elsewhere.

Change suggested by respondent:

Amend the plan to include the entire proposed site within the Plan.

Attachments:

Cover email - <https://carmarthenshire.oc2.uk/a/6zn>

Representation form - <https://carmarthenshire.oc2.uk/a/6zy>

Full representation form - <https://carmarthenshire.oc2.uk/a/6zp>

MAC 125

Support

Summary of representations:

Support MAC 125 in relation to the addition of a new appendix containing a schedule which provides details of the regeneration and mixed-use sites, phasing requirements, constraints, infrastructure requirements and planning obligations

Summary of representation changes to plan:

No change to the Plan.

Response:

Support welcomed.

Action:

No change to the Plan.

6072

Support

Document Element: MAC 125

Respondent: Natural Resources Wales

Summary:

Support MAC 125 in relation to the addition of a new appendix containing a schedule which provides details of the regeneration and mixed-use sites, phasing requirements, constraints, infrastructure requirements and planning obligations.

Change suggested by respondent:

No change to Plan.

Attachments:

NRW Reps - <https://carmarthenshire.oc2.uk/a/6m9>

Comment

Summary of representations:

The appendix will need to accurately reflect our representations and recognise that the demands on our infrastructure changes over time, and the capacity of existing infrastructure to accommodate the proposed allocations may change over the course of the LDP period

Summary of representation changes to plan:

Amend appendix 9 to update the infrastructure requirements

Response:

Noted.

The Council considers that the 4 sites highlighted within the representation can be updated to reflect the most up to date information.

Action:

Amend the Plan to update the new appendix on mixed use sites with the following:

PrC1/MU2 Pibwrlwyd Hydraulic Modelling Assessment (HMA) of the water supply network will be required.

- PrC3/MU1 Emlyn Brickworks Hydraulic Modelling Assessment (HMA) of the water supply network will be required.
- SeC16/MU1 Beechwood, Llandeilo Reinforcements will be required at Ffairfach Wasterwater Treatment Works (WwTW).
- PrC1/MU3 Nant y Caws There are no public sewers nearby therefore the provisions of WG Circular 008/2018 "Planning requirements in respect of the use of private sewerage in new development, incorporating septic tanks and small sewage treatment plants" apply

5994

Comment

Document Element: MAC 125**Respondent:** Dwr Cymru/Welsh Water**Summary:**

MAC 125 Appendix 9

We note that a new appendix is included to provide site information for the regeneration and mixed-use sites, including the infrastructure requirements. DCWW has made representations at the Deposit Plan consultation stage to highlight sewerage and water infrastructure requirements associated with proposed sites. The appendix will need to accurately reflect our representations and recognise that the demands on our infrastructure changes over time, and the capacity of existing infrastructure to accommodate the proposed allocations may change over the course of the LDP period. Notwithstanding this information, we have made comments on specific sites below:

- PrC1/MU2 Pibwrlwyd Hydraulic Modelling Assessment (HMA) of the water supply network will be required.
- PrC3/MU1 Emlyn Brickworks Hydraulic Modelling Assessment (HMA) of the water supply network will be required.
- SeC16/MU1 Beechwood, Llandeilo Reinforcements will be required at Ffairfach Wasterwater Treatment Works (WwTW).
- PrC1/MU3 Nant y Caws There are no public sewers nearby therefore the provisions of WG Circular 008/2018 "Planning requirements in respect of the use of private sewerage in new development, incorporating septic tanks and small sewage treatment plants" apply.

Change suggested by respondent:

-

Attachments:Written Response - <https://carmarthenshire.oc2.uk/a/6m4>Cover email - <https://carmarthenshire.oc2.uk/a/6m5>

5968

Comment

Document Element: MAC 125**Respondent:** Dwr Cymru/Welsh Water**Summary:**

The appendix will need to accurately reflect our representations and recognise that the demands on our infrastructure changes over time, and the capacity of existing infrastructure to accommodate the proposed allocations may change over the course of the LDP period. Notwithstanding this information, we have made comments on specific sites

Change suggested by respondent:

-

Attachments: None

MAC 126

Support

Summary of representations:

The respondent supports the inclusion of SeC6 (iii) Land at Fforest Road and [as landowner / developer] state that they will deliver in line with the trajectory.

Summary of representation changes to plan:

No change to Plan.

Response:

Support welcomed.

Action:

No change to Plan.

6001

Support

Document Element: MAC 126

Respondent: Persimmon Homes West Wales

Summary:

Persimmon Homes supports the inclusion of SeC6 (iii) Land at Fforest Road and will deliver in line with the trajectory

Change suggested by respondent:

No change to the Plan

Attachments:

Cover email - <https://carmarthenshire.oc2.uk/a/6m6>

Representation form redacted - <https://carmarthenshire.oc2.uk/a/6m8>

Object

Summary of representations:

The respondent supports the principle of amending the settlement boundary but maintain that the proposed changes should be further revised to ensure a sustainable pattern of growth is achieved at Bryn. In turn this approach will better contribute towards meeting identified housing needs, including the provision of homes for local people in an accessible and sustainable location. For the purposes of soundness, BR strongly believe that the proposed allocation at Land off Heol y Mynydd, Bryn should be extended to account for the site in its entirety. This would require a corresponding amendment to the development limits to include the full 5.4 hectares of land under Barratt Redrow's control, thereby avoiding any potential reliance upon the adjoining parcel of undeliverable white land to contribute to future housing supply.

By contrast Barratt Redrow notes that, as a consequence of the revised development limits, an area of unallocated "white land" immediately to the south of the proposed allocation (also accessed from Heol y Mynydd, Bryn) would, by default, be incorporated within the settlement boundary. In procedural terms, the inclusion of this land within the development limits creates the potential for it to come forward as a windfall site during the plan period. However, the land is understood to be landlocked, unregistered in terms of ownership and, as such, cannot presently be considered deliverable or developable.

Summary of representation changes to plan:

Include an additional parcel of land within the development limits and to be allocated within Bryn to accommodate further development promoted by the respondent. Reference is drawn to the full representation made relating to the proposed allocated site and the increase in housing numbers.

Response:

Noted. The site in question is included within the development limits as 'white land' with no designated proposed uses. Whilst it is noted that there would be potential for the site to be brought forward for potential development this would only be possible subject to access, amenity and infrastructural constraints being overcome. Consequently the site makes no contributions towards the Council's housing supply.

The potential for misinterpretation to site reference is noted, however these site references were only to the MAC consultation and a final adopted Revised LDP will contain a separate / new site reference for the new allocated site, therefore removing any potential confusion that may have occurred.

Action:

No change to the Plan.

6015

Object

Document Element: MAC 126

Respondent: Ms Zoe Aubery

Agent: Boyer Planning

Summary:

As part of the Matter Arising Changes (MACs), it is understood that an additional paragraph has been inserted explaining that:

"Development limits are a key mechanism for helping to manage future growth by defining the area within which development would normally be permitted, subject to material planning considerations.

The development limits have been applied to the Principal Centres, Service Centres and Sustainable Villages as defined in Strategic Policy SP3: Sustainable Distribution – Settlement Framework."

Barratt Redrow supports the principle of amending the settlement boundary but maintain that the proposed changes should be further revised to ensure a sustainable pattern of growth is achieved at Bryn. In turn this approach will better contribute towards meeting identified housing needs, including the provision of homes for local people in an accessible and sustainable location. For the purposes of soundness, BR strongly believe that the proposed allocation at Land off Heol y Mynydd, Bryn should be extended to account for the site in its entirety. This would require a corresponding amendment to the development limits to include the full 5.4 hectares of land under Barratt Redrow's control, thereby avoiding any potential reliance upon the adjoining parcel of undeliverable white land to contribute to future housing supply.

By contrast Barratt Redrow notes that, as a consequence of the revised development limits, an area of unallocated "white land" immediately to the south of the proposed allocation (also accessed from Heol y Mynydd, Bryn) would, by default, be incorporated within the settlement boundary. In procedural terms, the inclusion of this land within the development limits creates the potential for it to come forward as a windfall site during the plan period. However, the land is understood to be landlocked, unregistered in terms of ownership and, as such, cannot presently be considered deliverable or developable.

Barratt Redrow therefore requests that the additional land, directly to the west of the allocation, which has continuously been promoted for residential development should be incorporated within the allocation boundary. The land is available, within the control of the developer, and capable of being delivered during the early years of the Plan period. Moreover, its inclusion would provide greater certainty that future residential development in this location will be delivered in a more comprehensively, coherent and ultimately sustainable manner. Thereby avoiding piecemeal or speculative proposals coming forward on adjacent land. This approach would be more closely aligned with national policy and in particular WG's principles of good placemaking in order to contribute towards achieving sustainable development in accordance with Test 2 of the DPM.

In addition to the above, there appears to be some technical inconsistencies relating to site reference numbers and the physical extent of the development limits shown within the current Matters Arising Consultation document.

Firstly, the settlement boundary illustrated within the PDF version of the Matter Arising Changes documents (Figure 3) appears to be at odds with the boundary presented within the Council's interactive online mapping (Figure 2). As mentioned above whilst we understand that the intention is to amend the development limits of Bryn to incorporate Phase 1 of the site known as 'Land off Heol y Mynydd, Bryn' and, by virtue of which the unregistered parcel of white land located immediately to the south (BR maintains concerns regarding this approach). Currently there are discrepancies between the two plans which creates uncertainty as to the physical extent of the defined urban area and in turn adds an unnecessary layer of complication when interpreting the proposed changes. It is therefore essential that the Council clarifies the proposed arrangements on the PDF version (Figure 3) and rectifies any inconsistencies to ensure that all interested parties are able to make informed decisions based on an accurate and robust evidence base.

Secondly, there also appear to be inconsistencies in the allocation reference numbers relating to Land off Heol y Mynydd, Bryn. Throughout the Revised LDP, the allocation is generally referred to as PrC2/(V). However, within the Matter Arising Changes documentation, the site is identified as (MACM)PrC2/c, with the land to the south-east of Land off Heol y Mynydd, Bryn is allocated as (MACM)PrC2/v. Similar to the above these inconsistencies create ambiguity and have the potential to undermine effective interpretation and implementation of the Plan.

For completeness it is important that both of these matters are rectified for the purposes of accuracy/ transparency, and that the Revised LDP and all associated documentation consistently reflect the Council's intended position. Notwithstanding Barratt Redrow's continuing concerns regarding the appropriateness of extending the settlement boundary to include the unregistered parcel of white land, priority should instead be given to extending the proposed allocation at Heol y Mynydd, Bryn so as to provide a more coherent and defensible settlement edge.

Change suggested by respondent:

Amend the plan

Attachments:

Cover email - <https://carmarthenshire.oc2.uk/a/6zn>

Representation form - <https://carmarthenshire.oc2.uk/a/6zy>

Full representation form - <https://carmarthenshire.oc2.uk/a/6zp>

Comment

Summary of representations:

The appendix will need to accurately reflect our representations and recognise that the demands on our infrastructure changes over time, and the capacity of existing infrastructure to accommodate the proposed allocations may change over the course of the LDP period.

Summary of representation changes to plan:

Amend the new appendix 10 of the Revised LDP to update the infrastructural requirements of the noted sites

Response:

Noted. The Council considers that the sites highlighted within the representation can be updated to reflect the most up to date information.

Action:

Amend the Plan to update the new appendix 10 on housing allocations. The new wording could be inserted into the section on Key Considerations and constraints.

- SUV11/h1 Alltwallis: Reinforcements will be required at Alltwallis WwTW
- PrC2/h20 Harddfán, Bryn A scheme has been delivered, and capacity is available at Llangennech WwTW
- PrC2/(v) Heol y Mynydd, Bryn Hydraulic Modelling Assessment (HMA) of the water supply network will be required.
- SeC6/(iii) Forest Rd, Hendy Llannant WwTW limited capacity, AMP8 scheme being delivered by 2030
- SeC7/h3 Golwg yr Afon, Llangennech: A scheme has been delivered, and capacity is available at Llangennech WwTW
- SeC7/h4 Opposite Parc Morlais Llangennech: A scheme has been delivered and capacity is available at Llangennech WwTW
- PrC3/(i) Emlyn Brickworks: Hydraulic Modelling Assessment (HMA) of the water supply network will be required.
- SeC12/h1 Trem y Ddol Newcastle Emlyn: Reinforcements will be required at Adpar WwTW
- SeC12/h3 Rear of Dolcoed Newcastle Emlyn Reinforcements will be required at Adpar WwTW
- SeC19/h1 Land at Park View, Trevaughan Whitland WwTW has limited capacity, AMP8 scheme being delivered by 2030
- SeC19/h2 Land at Whitland Creamery Whitland WwTW has limited capacity, AMP8 scheme being delivered by 2030
- SeC20/h3 Land off Clifton Street Laugharne WwTW has limited capacity, AMP8 scheme being delivered by 2030
- SuV55/h2 Glandy Cross There are no public sewers nearby therefore the provisions of WG Circular 008/2018 "Planning requirements in respect of the use of private sewerage in new development, incorporating septic tanks and small sewage treatment plants" apply.
- SuV56/h1 Efailwen There are no public sewers nearby therefore the provisions of WG Circular 008/2018 "Planning requirements in respect of the use of private sewerage in new development, incorporating septic tanks and small sewage treatment plants" apply.

5995

Comment

Document Element: MAC 126

Respondent: Dwr Cymru/Welsh Water

Summary:

MAC 036 Policy INF4: Llanelli Wastewater Treatment Works Catchment Surface Water Removal

As highlighted in our original comments, we welcome the inclusion of Policy INF4 and are supportive of its principles to satisfy the requirements of the Burry Inlet Memorandum of Understanding (MoU) through compensatory surface water removal. We note that these amendments (MAC036) propose to define the threshold for major development sites and the possible requirement for surface water removal for minor developments. However, whilst we acknowledge this provision is to identify a mitigation measure for nutrient neutrality, the NRW/Welsh Government 'Mitigation Measures Menu' recognises that surface water removal (or SuDS) can only provide a modest removal rate. Therefore, whilst the principle may be acceptable, the Policy should recognise that surface water removal may not necessarily outright "secure nutrient neutrality", in accordance with Policy CCH4, but could be utilised as part of its strategy.

Turning to Paragraph 11.205, we commend the Council's inclusion of a 'Burry Inlet' SPG and welcome the reference to flow calculations in its supporting appendices. We are supportive of this text and would add that the quantifiable amount of surface water to be removed can be expressed as l/s or in terms of its area (sqm), for residential development, which aligns to the SPG appendices.

MAC 046 Policy PSD1: Effective Design Solutions: Principles of Placemaking

We acknowledge amendments (MAC 046) proposed to the criteria for Policy PSD1 and welcome reference to maximised opportunities for water resilience in criteria (g). We agree that water efficiency in new developments can offer multiple benefits and we recognise it can positively contribute to nutrient neutrality provided it forms part of a wider package of mitigation, as referenced in Paragraph 11.284. Similar to the above (MAC 036), we would highlight that water efficiency measures may not secure nutrient neutrality, in accordance with Policy CCH4, but could be utilised as part of its strategy.

MAC 080 CCH4: Water Quality and Protection of Water Resources

As highlighted in our original comments, we welcome the inclusion of Policy CCH4 and acknowledge that these amendments (MAC 080) propose to amalgamate the impact of development on nutrient sensitive protected sites, to substitute phosphorous sensitive riverine SACs. We defer to NRW's 'Advice to planning authorities for planning applications affecting nutrient sensitive Special Areas of Conservation' to determine which development will be required to achieve nutrient neutrality and remind that DCWW is a statutory consultee for most planning applications. With reference to the amendments to Paragraphs 11.513 to 11.515 ('Riverine'), we acknowledge the variety of strategic and developer-led mitigatory actions and welcome the continued collaborative partnership work with NMBs. DCWW remain committed to the 'fair share' approach, as defined by Welsh Government's practical guidance for public authorities (DTA Ecology), through our phosphorus investment plan to remove 90% of the phosphorous load from WwTWs discharging to failing SAC rivers. In accordance with NRW's planning advice, we will continue to comment on the capacity of WwTWs to treat foul water flows alongside confirmation of its compliance with permit conditions, including effective dates as identified by the review of permits. Aside of the permit headroom capacity, we defer to the Council's Action Plan to identify any further measures to mitigate against any increasing nutrient loads in the river.

We acknowledge a separate sub-heading for 'Marine', including requirements to achieve nutrient neutrality within the Burry Inlet Inner and Milford Haven Inner freshwater catchments. We would advise the Council that most site locations within are likely to discharge into these catchments; however, it should also be noted that some sites may be located outside but ultimately drain via a sewerage network into the affected freshwater catchment. For example, Burry Port is located outside but comprises of a sewerage network which drains to Llanelli Coastal WwTW and therefore discharges into the Burry Inlet Inner. Similarly, albeit rarely, there are site locations located within but discharge to a sewerage network outside of the freshwater catchment and examples of sites that are on the periphery of networks within and outside. For completeness, we refer to NRW's latest planning advice and recognise DCWW's duty to confirm which WwTW the site would connect to and its compliance with permit conditions.

We acknowledge the Council's intention to produce "multilayered" guidance for strategic and developer led mitigation for developments in the freshwater catchments and we would advocate for close collaboration with DCWW on this approach, particularly if it relates to any public sewerage assets. On this point, DCWW is undertaking its source apportionment modelling programme which is programmed to conclude in Spring 2027 and will be important to ensure any mitigation measures are aligned with the modelling findings. As highlighted above (MAC 036), we remind that surface water removal may not secure nutrient neutrality but could be considered as part of the

mitigation strategy. We note the Council's proposal to produce a library of resources to assist developers in this matter, alongside external sources, and welcome the intention to regularly update the library which can align to any further updates in NRW's planning advice.

Lastly, we welcome the addition of a new paragraph to reflect the requirements of TAN 15 and advocate for early engagement with the SAB and any other stakeholder, including DCWW, where the drainage proposals will have an impact on their interests. We also welcome the production of an SPG to support this Policy, in relation to a nutrient mitigation toolkit alongside the aforementioned 'Burry Inlet' SPG to consider sustainable management of surface water drainage.

MAC 125 Appendix 9

We note that a new appendix is included to provide site information for the regeneration and mixed-use sites, including the infrastructure requirements. DCWW has made representations at the Deposit Plan consultation stage to highlight sewerage and water infrastructure requirements associated with proposed sites. The appendix will need to accurately reflect our representations and recognise that the demands on our infrastructure changes over time, and the capacity of existing infrastructure to accommodate the proposed allocations may change over the course of the LDP period. Notwithstanding this information, we have made comments on specific sites below:

- PrC1/MU2 Pibwrlwyd Hydraulic Modelling Assessment (HMA) of the water supply network will be required.
- PrC3/MU1 Emlyn Brickworks Hydraulic Modelling Assessment (HMA) of the water supply network will be required.
- SeC16/MU1 Beechwood, Llandeilo Reinforcements will be required at Ffairfach Wasterwater Treatment Works (WwTW).
- PrC1/MU3 Nant y Caws There are no public sewers nearby therefore the provisions of WG Circular 008/2018 "Planning requirements in respect of the use of private sewerage in new development, incorporating septic tanks and small sewage treatment plants" apply.

MAC 126 Appendix 10

We note that a new appendix is included to provide site information on allocated sites, including the infrastructure requirements DCWW has made representations at the Deposit Plan consultation stage to highlight sewerage and water infrastructure requirements associated with proposed sites. The appendix will need to accurately reflect our representations and recognise that the demands on our infrastructure changes over time, and the capacity of existing infrastructure to accommodate the proposed allocations may change over the course of the LDP period. Notwithstanding this information, we have made comments on specific sites below:

- SUV11/h1 Alltwallis Reinforcements will be required at Alltwallis WwTW
- PrC2/h20 Harddfan, Bryn A scheme has been delivered, and capacity is available at Llangennech WwTW
- PrC2/(v) Heol y Mynydd, Bryn Hydraulic Modelling Assessment (HMA) of the water supply network will be required.
- SeC6/(iii) Forest Rd, Hendy Llannant WwTW limited capacity, AMP8 scheme being delivered by 2030
- SEC7/h3 Golwg yr Afon, Llangennech A scheme has been delivered, and capacity is available at Llangennech WwTW
- SEC7/h4 Opposite Parc Morlais Llangennech A scheme has been delivered and capacity is available at Llangennech WwTW
- PrC3/(i) Emlyn Brickworks Hydraulic Modelling Assessment (HMA) of the water supply network will be required.
- SeC12/h1 Trem y Ddol Newcastle Emlyn Reinforcements will be required at Adpar WwTW
- SeC12/h3 Rear of Dolcoed Newcastle Emlyn Reinforcements will be required at Adpar WwTW
- SeC19/h1 Land at Park View, Trevaughan Whitland WwTW has limited capacity, AMP8 scheme being delivered by 2030
- SeC19/h2 Land at Whitland Creamery Whitland WwTW has limited capacity, AMP8 scheme being delivered by 2030

- SeC20/h3 Land off Clifton Street Laugharne WwTW has limited capacity, AMP8 scheme being delivered by 2030
- SuV55/h2 Glandy Cross There are no public sewers nearby therefore the provisions of WG Circular 008/2018 “Planning requirements in respect of the use of private sewerage in new development, incorporating septic tanks and small sewage treatment plants” apply.
- SuV56/h1 Efailwen There are no public sewers nearby therefore the provisions of WG Circular 008/2018 “Planning requirements in respect of the use of private sewerage in new development, incorporating septic tanks and small sewage treatment plants” apply.

Change suggested by respondent:

-

Attachments:

Written Response - <https://carmarthenshire.oc2.uk/a/6m4>

Cover email - <https://carmarthenshire.oc2.uk/a/6m5>

5969

Comment

Document Element: MAC 126

Respondent: Dwr Cymru/Welsh Water

Summary:

The appendix will need to accurately reflect our representations and recognise that the demands on our infrastructure changes over time, and the capacity of existing infrastructure to accommodate the proposed allocations may change over the course of the LDP period. Notwithstanding this information, we have made comments on specific sites

Change suggested by respondent:

-

Attachments: None

Support

Summary of representations:

The respondent is supportive of that included within the Key Considerations and Constraints affecting the site, particularly the need for the development requiring a Commuted Sum towards community benefits in line with Policy INF1. This is a key point as the developer within phase 2 of the development was only required to provide a small (165sqm) play area and was not required to provide any play equipment.

Summary of representation changes to plan:

No change to the Plan.

Response:

Support welcomed.

Action:

No change to the Plan.

6085

Support

Document Element: MAC 126**Respondent:** Llanllawddog Community Council**Summary:**

The Community Council is also supportive of that included within the Key Considerations and Constraints affecting the site, particularly the need for the development requiring a Commuted Sum towards community benefits in line with Policy INF1 and that a planning obligations will be sought to ensure that the effects of developments are fully addressed in order to make the development acceptable. This is a key point as the developer within phase 2 of the development was only required to provide a small (165sqm) play area and was not required to provide any play equipment.

Change suggested by respondent:

No change to the Plan

Attachments:

Email Representation redacted - <https://carmarthenshire.oc2.uk/a/6mw>

MACM/PrC2/a

Support

Summary of representations:

The respondent supports the allocation of the site

Summary of representation changes to plan:

No change to the Plan.

Response:

Support welcomed.

Action:

No change to the Plan.

6005

Support

Document Element: MACM/PrC2/a**Respondent:** Turley**Summary:**

Support the inclusion of the site

Change suggested by respondent:

No change to the Plan

Attachments:

Cover email - <https://carmarthenshire.oc2.uk/a/6zb>

Supporting statement - <https://carmarthenshire.oc2.uk/a/6zc>

MACM/PrC2/b

Support

Summary of representations:

Supports inclusion of site

Summary of representation changes to plan:

No change to Plan

Response:

Support welcomed

Action:

None

5986

Support

Document Element: MACM/PrC2/b

Respondent: David Tudor Davies

Summary:

Supports inclusion of site

Change suggested by respondent:

No change to Plan

Attachments:

Land at Pendderi Road, Bryn - <https://carmarthenshire.oc2.uk/a/6z3>

MACM/PrC2/c

Object

Summary of representations:

The respondent wholly supports the principle of proposed allocation at Heol y Mynydd, Bryn, it is noted that the Council has identified only the eastern portion of the site for 80 dwellings. Given the context the respondent strongly believes there is sufficient evidence to justify allocating the site in its entirety for up to 160 dwellings.

Please see the respondent's full representation below.

Summary of representation changes to plan:

Increase the size of the site from 80 dwellings to 160 dwellings.

Response:

The Council considers that the scale of the site, and in particular the housing numbers associated with the land has been subject to detailed consideration through the examination process and is consistent and appropriate to its location. Whilst the respondent points in relation to additional housing numbers and the resultant housing supply are noted, these matters have been fully considered through the examination and the current proposed allocation is considered sufficient and appropriate in this respect

Action:

No change to the Plan.

Document Element: MACM/PrC2/c

Respondent: Ms Zoe Aubery

Agent: Boyer Planning

Summary:

Whilst BR wholly support the principle of proposed allocation at Heol y Mynydd, Bryn, it is noted that the Council has identified only the eastern portion of the site for 80 dwellings. Given the context we strongly believe there is sufficient evidence to justify allocating the site in its entirety for up to 160 dwellings.

Site Allocation PrC2/(v)

BR appreciate the inclusion of Land at Heol y Mynydd, Bryn as a housing allocation within the Revised Carmarthenshire Local Development Plan for 80 units. However, it is still considered that the site is able to accommodate further development in order to maximise the opportunities to deliver homes in a highly sustainable location which in turn forms part of the Swansea Bay & Llanelli National Growth Area in line with Future Wales.

By virtue of the above Barratt Redrow suggest that the draft LDP policy for Heol y Mynydd, Bryn (PrC2/(v)) should be increased to 160 homes for the following reasons:

1. It would make efficient use of the site in accordance with national policy;
2. The site is being promoted by a national housebuilder that is committed to delivering homes in the short-medium term – increasing the quantum of development on this allocation would ensure the draft RLDP delivers sufficient homes throughout the first part of the Plan period and maintains a more consistent supply of dwellings over the entire plan period.
3. The site falls within Cluster 2: Llanelli and Southern Gwendraeth Area which has been identified as a 'national growth area' within Future Wales. To this end, with the potential for up to 160 dwellings to be delivered, this site is genuinely deliverable and can contribute to the identified housing need within the locality. Ultimately the proposed allocation of the site in its entirety would provide greater certainty in ensuring the emerging RLDP is able to effectively meet local housing need over the emerging plan period. Whilst also supporting a more consistent supply of homes in accordance with the Council's trajectory with sufficient contingency built-in to account for any unforeseen slippages elsewhere.

For completeness, if the Inspectors were minded to recommend allocating Heol y Mynydd for the full 160 homes and retaining all other proposed site allocations as currently drafted, this would only result in an increase to 1,072 homes (as opposed to 992 set out in MAC document) equating to a housing supply of 9,894 homes. With regards to the proposed flexible allowance such changes would result in a figure of 12.15% compared to 11.24% as currently mentioned within the RLDP MAC version.

Although we appreciate these amendments are relatively minor in terms of plan-making they remain in keeping with the context of Carmarthenshire whilst providing greater certainty that the emerging plan is capable of meeting the identified housing need over the plan period.

Change suggested by respondent:

Amend the plan

Attachments:

Cover email - <https://carmarthenshire.oc2.uk/a/6zn>

Representation form - <https://carmarthenshire.oc2.uk/a/6zy>

Full representation form - <https://carmarthenshire.oc2.uk/a/6zp>

MACM/SeC6/b

Object

Summary of representations:

Whilst the respondent references MACM/SeC6/b, from the accompanying wording it is clear that they are objecting to MACM/SeC6/c - which relates to the additional site allocation [for housing] SeC6/(iii) Land at Fforest Road (Hendy).

Summary of representation changes to plan:

Remove site from the Plan.

Response:

The new housing allocation SeC6(iii) was included as an additional site during the Examination. It has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared, and any potential constraints have been considered.

Action:

No change to Plan.

5974

Object

Document Element: MACM/SeC6/b

Respondent: Miss Bronwen Hill

Summary:

I object to the proposed housing development on the field adjacent to Clos Benallt Fawr, Fforest Road. This green space is important for local wildlife and helps maintain the rural character of the area. The development would significantly increase traffic on forest Road, which already experiences congestion. When the M4 Hendy junction is closed due to accidents, roadworks or diversions, traffic is redirected through forest Road, causing major delays and disruption for residents. Additional housing would worsen these problems. I am also concerned about drainage, flooding risks and increased pressure on local schools, healthcare services and other infrastructure.

Change suggested by respondent:

The plan should be amended to remove the proposed housing allocation from this site. This field provides an important area of open space between existing residential development and the surrounding countryside and contributes to the character of the local area.

Retaining the land in its current form would help preserve the area's identity and prevent further urbanisation of the landscape. The site should remain undeveloped and continue to serve as a valuable green space for the benefit of current and future generations.

Removing the allocation would better reflect the wishes and concerns of local residents and protect the community's environment.

Attachments: None

MACM/SeC6/c

Object

Summary of representations:

Sylwadau yn gwrthwynebu cynnwys y dyraniad tai ychwanegol SeC6/(iii) Tir yn Heol Fforest (Yr Hendy), gan nodi nifer o resymau megis pryderon ynghylch priffyrdd, draenio, ac effeithiau posibl ar seilwaith lleol, amwynderau a bioamrywiaeth.

Representations objecting to the inclusion of the additional housing allocation SeC6/(iii) Land at Fforest Road (Hendy), citing a number of reasons such as highway concerns, drainage, and the potential effects on local infrastructure, amenity, and biodiversity.

Summary of representation changes to plan:

Mae'r ymatebwyr yn gofyn am dynnu'r dyraniad tai yn ei ôl.

Respondents request the removal of the housing allocation.

Response:

Anghytuno; mae dyraniad y safle o fewn y Cynllun Datblygu Lleol (LDP) at ddibenion preswyl wedi cael ei ystyried yn llawn drwy'r dull asesu safleoedd. Fel rhan o'r broses asesu hon, paratowyd ffurflen safle fanwl, ac ystyriwyd unrhyw gyfyngiadau posibl.

Disagree, the allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared, and any potential constraints have been considered.

Action:

Dim newid i'r Cynllun.

No change to the Plan.

5957

Object

Document Element: MACM/SeC6/c

Respondent: Mr Stuart Crocker

Summary:

Severe drainage problems already in situ on and around the proposed site and adjacent development

Loss of privacy, overbearance, and loss of light.

Severe impact on the A48 where a proposers 650 houses are already at an advanced stage in a nearby location.

Environmental impact and loss of aged countryside.

Change suggested by respondent:

The land needs to remain in use as it currently is.

Attachments:

Photo 1 - <https://carmarthenshire.oc2.uk/a/6gz>

5971

Object

Document Element: MACM/SeC6/c**Respondent:** Mr Richard Jones**Summary:**

Land suitability - The field proposed is regularly boggy, even in nice weather. During rain the river will burst its banks and the field next to existing houses, and those houses gardens themselves, offer no foundation underfoot. This was previously identified in surveys which have not been redone.

Traffic - Fforest road is a bottle neck with cars parked on the road and is already unsafe. Further vehicles coming from Fforest and then also the pressures on Iscoed Rd with the anticipated large estate being built in Pontardulais, coupled with this, will cause huge traffic congestion outside a primary school.

Change suggested by respondent:

The land is simply not suitable. A site closer to Pont Abraham would be better to support traffic congestion on a different motorway junction.

Attachments: None

5979

Object

Document Element: MACM/SeC6/c**Respondent:** Ms Mirain Francis**Summary:**

Dymunaf gyflwyno gwrthwynebiad ffurfiol i gynnwys safleoedd SR/069/001 a SR/069/003 yn y Cynllun Datblygu Lleol (CDLI) Sir Gaerfyrddin.

Nid wyf yn credu bod angen datblygu'r tir hwn. Mae Cyngor Sir Gaerfyrddin wedi dweud o'r blaen nad oes angen mwy o dir ar gyfer tai yn ardal Fforest a'r Hendy. Dylid defnyddio'r tai gwag sydd eisoes ar gael ledled y sir cyn dyrannu tir newydd. Pan gafodd estyniad Clos Benallt ganiatâd, dywedwyd mai cartrefi i bobl leol oedd y bwriad. Fodd bynnag, nid yw'n ymddangos mai dyna sydd wedi digwydd.

Fel teulu Cymraeg, rydym wedi gweld y Gymraeg yn dirywio yn ein cymuned dros y blynyddoedd diwethaf. Ychydig iawn o'r bobl sydd wedi symud i'r datblygiad newydd sy'n siarad Cymraeg, ac mae'n debygol y bydd datblygiad pellach yn gwaethgu hyn. Dylai'r Cyngor edrych yn ofalus ar effaith unrhyw ddatblygiad ar yr iaith Gymraeg a defnyddio'r dystiolaeth ddiweddaraf cyn gwneud penderfyniad.

Mae'r tir hefyd yn anaddas ar gyfer adeiladu. Mae'n dir gwlyb gyda phroblemau draenio ac mae ffynhonnau tanddaearol yn cadw'r tir yn wlyb drwy'r flwyddyn. Yn ystod adeiladu'r datblygiad diwethaf yn Clos Benallt, cafwyd problemau gyda rhai sylfeini yn suddo ac roedd angen gwneud gwaith ychwanegol. Mae'r tir hefyd yn rhedeg i lawr tuag at afon Llwhwr, sydd ag enw da am lifogydd. O dan TAN 15, dylai'r Cyngor sicrhau na fydd unrhyw ddatblygiad newydd yn cynyddu'r risg o lifogydd na phroblemau dŵr wyneb. Mae hyn yn arbennig o bwysig gan fod y system ddraenio yn y datblygiad diweddar eisoes wedi gorlifo.

Mae traffig yn broblem fawr yn yr ardal. Mae'r datblygiad diweddar wedi dod â mwy o geir, ac mae'r A48, yr A4138 a Fforest Road eisoes yn brysur iawn. Mae mynediad i Clos Benallt yn anodd ar adegau, a bydd mwy o dai yn gwneud y sefyllfa'n waeth.

Mae'r safle hefyd yn agos at Ardal o Ddiddordeb Gwyddonol Arbennig (SSSI). Byddai adeiladu ar y tir hwn yn niweidio bywyd gwylt ac yn golygu colli tir amaethyddol a rhan o gymeriad gwledig yr ardal.

Fel preswlydd lleol, cefais brofiad o'r aflonyddwch yn ystod y datblygiad diwethaf. Roedd sŵn adeiladu, traffig trwm a lorïau yn ciwio gyda'u peiriannau ymlaen am gyfnodau hir. Cafodd hyn effaith ar ansawdd bywyd y trigolion, ac

mae'n debygol y byddai'r un peth yn digwydd eto.

Yn fy marn i, mae Fforest a'r Hendy eisoes wedi gweld digon o ddatblygu. Nid yw'r ffyrdd na'r seilwaith lleol yn gallu ymdopi â mwy o dai. Mae datblygiadau eraill sydd wedi'u cynllunio gerllaw hefyd yn golygu y bydd yr effaith yn waeth fyth.

Am y rhesymau hyn, gofynnaf yn barchus i Gyngor Sir Caerfyrddin beidio â chynnwys safleoedd SR/069/001 a SR/069/003 yn y Cynllun Datblygu Lleol. Gofynnaf hefyd am gadarnhad ysgrifenedig eich bod wedi derbyn y gwrthwynebiad hwn.

Site: Land behind Clos Benallt Fawr, Fforest (SR/069/001 and SR/069/003)

I wish to submit a formal objection to the inclusion of sites SR/069/001 and SR/069/003 in the Carmarthenshire Local Development Plan.

I do not believe there is a need to develop this land. Carmarthenshire County Council has previously stated that no additional land is needed for housing in the Fforest and Hendy area. Empty properties across the county should be brought back into use before allocating more land for development. When the extension to Clos Benallt was approved, it was said that the new homes were intended for local people. However, this does not appear to have been achieved.

As a Welsh-speaking family, we have seen a noticeable decline in the use of the Welsh language within our community over recent years. Very few of the people who have moved into the recent development speak Welsh, and further development is likely to make this worse. The Council should carefully consider the impact that any new development would have on the Welsh language and use the most up-to-date evidence before making a decision. The land itself is also unsuitable for development. It is wet grazing land with long-standing drainage problems, and underground springs keep the ground waterlogged throughout the year. During the construction of the previous Clos Benallt development, there were problems with some foundations sinking, which required additional engineering work. The land also slopes down towards the River Loughor, an area with a well-known history of flooding. Under TAN 15, the Council has a duty to ensure that new development does not increase the risk of flooding or surface water problems. This is particularly important as the drainage system serving the recent development has already overflowed.

Traffic is already a major problem in the area. The recent development has brought more vehicles onto the local roads, and the A48, the A4138 and Fforest Road are already very busy. Access to Clos Benallt can be difficult, and further housing would only make the situation worse.

The site is also close to a Site of Special Scientific Interest (SSSI). Building on this land would harm wildlife, result in the loss of valuable agricultural land and damage the rural character of the area.

As a local resident, I experienced significant disruption during the previous construction work. There was constant building noise, heavy traffic and long queues of lorries left idling for extended periods. This had a clear impact on residents' quality of life, and the same problems are likely to occur again if further development is allowed. In my view, Fforest and Hendy have already experienced enough development. The local roads and infrastructure are not able to cope with more housing, and other proposed developments nearby will place even greater pressure on the area.

For these reasons, I respectfully ask Carmarthenshire County Council not to allocate sites SR/069/001 and SR/069/003 within the Local Development Plan. I would also appreciate written confirmation that you have received this objection.

Change suggested by respondent:

Dileu'r safle o'r Cynllun

Remove the site from the Plan

Attachments:

Objection to the Allocation of the Land behind Clos Benallt Fawr in the Local Development Plan (LDP) - <https://carmarthenshire.oc2.uk/a/6km>

5958**Object**

Document Element: MACM/SeC6/c

Respondent: Mr Mark Edwards

Summary:

I object to the allocation of SeC6/(iii) – Land at Fforest Road, Hendy. The site has known drainage, groundwater and surface water concerns, and there is insufficient evidence that development would not increase flood risk on or off site. I am also concerned about the cumulative impact of additional housing on local roads, particularly Fforest Road and the A48. Given these constraints, I do not believe the allocation has been demonstrated to be fully deliverable or sustainable. The site should be removed from the Plan, or further evidence should be required before allocation proceeds.

Change suggested by respondent:

Remove allocation SeC6/(iii) – Land at Fforest Road, Hendy from the Plan. Alternatively, defer the allocation until detailed evidence has been provided demonstrating that drainage, groundwater, flood risk, highway access and cumulative traffic impacts can be addressed without adverse effects on existing residents and infrastructure.

Attachments: None

5983**Object**

Document Element: MACM/SeC6/c

Respondent: Mr Ian Jones

Summary:

Objects to the inclusion of the site citing concerns regarding drainage, highways and impact on local services.

Change suggested by respondent:

Remove site from the Plan

Attachments:

Email redacted - <https://carmarthenshire.oc2.uk/a/6m3>

5984

Object

Document Element: MACM/SeC6/c**Respondent:** Huw a Menna Watkins**Petition:** 2 petitioners**Summary:**

Yn gwrthwynebu cynnwys y safle gan nodi pryderon ynghylch draenio a llifogydd, effaith ar wasanaethau lleol, seilwaith a chyfleusterau, capasiti priffyrdd, colli cefn gwlad agored o amgylch yr anheddiad, colli tir o werth ecolegol a bioamrywiaeth ac effaith ar ddiwylliant lleol a'r iaith Gymraeg.

Objects to the inclusion of the site citing concerns relating to drainage and flooding, impact on local services, infrastructure and facilities, highway capacity, loss of open countryside around the settlement, loss of land of ecological and biodiversity value and impact on local culture and the Welsh language.

Change suggested by respondent:

Dileu'r safle.

Remove site.

Attachments:

Land off Clos Benallt Fawr, Fforest - <https://carmarthenshire.oc2.uk/a/6zr>

Land off Clos Benallt Fawr, Fforest - <https://carmarthenshire.oc2.uk/a/6zs>

5975

Object

Document Element: MACM/SeC6/c**Respondent:** Miss Bronwen Hill**Summary:**

I object to the proposed housing development on the field adjacent to Clos Benallt Fawr, Fforest Road.

This green space is important for local wildlife and helps maintain the rural character of the area. The development would significantly increase traffic on forest Road, which already experiences congestion. When the M4 Hendy junction is closed due to accidents, roadworks or diversions, traffic is redirected through forest Road, causing major delays and disruption for residents. Additional housing would worsen these problems. I am also concerned about drainage, flooding risks and increased pressure on local schools, healthcare services and infrastructure.

Change suggested by respondent:

The plan should be amended to remove the proposed housing allocation from this site. This field provides an important area of open space between existing residential development and the surrounding countryside and contributes to the character of the local area.

Retaining the land in its current form would help preserve the area's identity and prevent further urbanisation of the landscape. The site should remain undeveloped and continue to serve as a valuable green space for the benefit of current and future generations.

Removing the allocation would better reflect the wishes and concerns of local residents and protect the community's environment.

Attachments: None

5987

Object

Document Element: MACM/SeC6/c**Respondent:** Mr H R Davies**Summary:**

Objects to the inclusion of the site citing concerns regarding drainage, highways capacity, impact on public services, coalescence of settlements and loss of land of biodiversity and ecological value.

Change suggested by respondent:

Remove site from the Plan

Attachments:

Land in Field adjacent to Close Benallt Fawr - <https://carmarthenshire.oc2.uk/a/6z4>

5997

Object

Document Element: MACM/SeC6/c**Respondent:** Mr Steffan Beange**Summary:**

Objects to the inclusion of the site citing concerns regarding surface water and flooding, highway capacity, loss of land of ecological and biodiversity value, impact on local facilities and services, future maintenance of public areas and impact on landscape character.

Change suggested by respondent:

Remove site from the plan

Attachments:

Submission attached - <https://carmarthenshire.oc2.uk/a/6z8>

6006

Object

Document Element: MACM/SeC6/c**Respondent:** Dr Non Evans**Summary:**

Yn gwrthwynebu MAC/SeC6/c, gan nodi pryderon megis angen Datblygu Heb ei Brofi, Effaith ar yr Iaith Gymraeg, Natur Anaddas y Tir, Hanes Problemau Adeiladu a Llifogydd, Risg Llifogydd, Methiant Seilwaith Draenio Presennol, Effaith ar Drafnidiaeth, Effaith Amgylcheddol, Colli Tir Amaethyddol a Chymeriad Gwledig, Effaith ar Ansawdd Bywyd Preswylwyr, Gor-ddatblygu a Seilwaith Dan Straen

Objects to MAC/SeC6/c citing concerns such as Lack of Demonstrated Need, Impact on the Welsh Language, Unsuitable Land Conditions, Historical Drainage and Flooding Issues, Flood Risk, Failure of Existing Infrastructure, Traffic and Transport Concerns, Environmental Impact, Impact on Residents and Overdevelopment and Infrastructure Strain.

Change suggested by respondent:

Remove MACM/SeC6/c from the Plan

Attachments:

Email - <https://carmarthenshire.oc2.uk/a/6zd>

6029

Object

Document Element: MACM/SeC6/c

Respondent: Mr Mike Pugh

Summary:

Subject: I object to the proposed allocation of sites SR/069/001 and SR/069/003, adjacent to Clos Benallt Fawr and the A48 Carmarthen Road, within the latest Local Development Plan (LDP) for the following reasons.

I object to the proposed allocation of sites SR/069/001 and SR/069/003, adjacent to Clos Benallt Fawr and the A48 Carmarthen Road, within the latest Local Development Plan (LDP) for the following reasons.

The sites comprise wet grazing land that is currently and consistently used for sheep and cattle grazing. The land is known to have drainage constraints. Previous development in the immediate area has encountered ongoing difficulties associated with underground springs and attenuation infrastructure installed to mitigate flooding.

It has been reported that this infrastructure has overflowed on several occasions during periods of both moderate and heavy rainfall. In accordance with TAN 15, the Council and developers must demonstrate that any development would not increase flood risk or surface water problems, either on-site or elsewhere within the catchment, including downstream impacts on the River Loughor. We have already witnessed extensive flooding within the Loughor Valley, with floodwaters reaching the level of the railway bridge at Pontardulais Station.

The land also contributes to local biodiversity and ecological connectivity. As permanent pasture containing wet areas and established field boundaries, the site should be fully assessed in accordance with TAN 5 before any allocation is considered. The proposed allocation would result in the loss of open countryside that currently forms a clear and defensible settlement boundary for Fforest.

Development of these sites would significantly extend urban sprawl into the rural landscape and adversely alter the character of the area. Furthermore, the cumulative impact of this proposal, together with substantial housing growth proposed elsewhere within the River Loughor corridor, including developments within neighbouring authority areas, should be fully assessed before any allocation is made.

TAN 18 should also be considered, as this development would have a significant impact on traffic generation and congestion. In particular, access and egress onto the A48 would become a serious source of additional congestion.

The planning documents indicate that the Council previously considered that sufficient residential land had already been allocated within the Fforest/Hendy area and resisted further expansion beyond existing allocations. Developer representations specifically argued that land associated with the former SR/069/003 area should be allocated, whereas the Council's own assessments concluded that additional land was not required.

The land included within this LDP allocation borders a Site of Special Scientific Interest (SSSI) and lies within the wider River Loughor corridor. Continued development in such close proximity to the river will inevitably place increasing pressure on this environmentally sensitive area.

In addition, Swansea Council is currently considering an application for approximately 650 homes on the opposite side of the River Loughor, on the hillside facing the Benallt site (SR/069/003). This proposal should be taken into account when assessing the cumulative impact of development within the corridor. There are also five candidate sites within that area, all of which would contribute to further urban sprawl and increased traffic movements towards the M4 via Hendy.

Road Traffic Statistics UK records indicate traffic flows of between 7,500 and 8,000 vehicles per day on the A48 and A4138, based on traffic census data. A traffic survey was undertaken at M4 Junction 48 in connection with the Llwyn Bedw development, and no significant issues were identified. However, this survey was commissioned by the developer. While developers may argue that improvements have since been made to Junction 48, it is my view that these works have not materially altered the existing situation, particularly when considering the potential impact of

further development.

Traffic management and road infrastructure are of critical importance, as Bronallt Road is widely used as a shortcut by motorists seeking to avoid congestion at the Hendy/Pontardulais roundabout near the Black Horse. While developers may seek to dismiss these concerns, the overriding issue remains that the continued development of Fforest Hill will inevitably increase surface water runoff, environmental pressures, and flood risk within the River Loughor catchment.

It is unrealistic to expect that large areas of countryside can be continuously covered by hard surfaces without significant consequences for the surrounding environment and downstream communities.

For these reasons, I respectfully request that the proposed allocation of sites SR/069/001 and SR/069/003 be removed from the Local Development Plan.

Change suggested by respondent:

Remove the site from the Plan

Attachments:

Email representation redacted - <https://carmarthenshire.oc2.uk/a/6ms>

5981

Object

Document Element: MACM/SeC6/c

Respondent: Mr Benjamin Dicken

Summary:

Objects to the inclusion of MACM/SeC6/c citing concerns regarding privacy, loss of countryside, harm to landscape character and permanent damage to the local environment, drainage and flood risk, biodiversity and ecological impact, traffic, highway safety and accessibility, pressure on local infrastructure and services, previous planning assessments and the cumulative impact on the community

Change suggested by respondent:

Remove MACM/SeC6/c from the Plan

Attachments:

Objection - <https://carmarthenshire.oc2.uk/a/6ky>

Email cover - <https://carmarthenshire.oc2.uk/a/6kp>

5985

Object

Document Element: MACM/SeC6/c

Respondent: Mike Mulroy

Summary:

Objects to the inclusion of the site citing concerns relating to drainage and flooding, impact upon local services, facilities and infrastructure, highway capacity, loss of important habitat and impact upon the Welsh language.

Change suggested by respondent:

Remove site from the Plan

Attachments:

Land off Clos Benallt Fawr, Fforest - <https://carmarthenshire.oc2.uk/a/6zt>

5988

Object

Document Element: MACM/SeC6/c**Respondent:** Ms Lawri Powell**Summary:**

Respondent objects to the inclusion of the site citing concerns relating to drainage and flooding, the loss of land of ecological and biodiversity value, impact upon local facilities and services, impact upon the Welsh language and highway capacity.

Change suggested by respondent:

Remove site.

Attachments:

Land off Clos Benallt Fawr, Fforest - <https://carmarthenshire.oc2.uk/a/6z5>

6004

Object

Document Element: MACM/SeC6/c**Respondent:** Mr Michael Davies**Summary:**

Objects to MACM/Sec6/c citing concerns regarding the impact the proposed allocation will have on surface water and drainage as well as general concerns such as traffic, and scale of growth.

Change suggested by respondent:

Removal of MACM/Sec6/c.

Attachments:

Photo 1 - <https://carmarthenshire.oc2.uk/a/6xr>

Photo 2 - <https://carmarthenshire.oc2.uk/a/6xs>

Photo 3 - <https://carmarthenshire.oc2.uk/a/6xt>

Photo 4 - <https://carmarthenshire.oc2.uk/a/6x3>

Photo 5 - <https://carmarthenshire.oc2.uk/a/6x4>

Photo 6 - <https://carmarthenshire.oc2.uk/a/6x5>

Photo 7 - <https://carmarthenshire.oc2.uk/a/6x6>

Photo 8 - <https://carmarthenshire.oc2.uk/a/6x8>

Photo 9 - <https://carmarthenshire.oc2.uk/a/6x9>

Photo 10 - <https://carmarthenshire.oc2.uk/a/6xv>

Photo 11 - <https://carmarthenshire.oc2.uk/a/6xb>

Photo 12 - <https://carmarthenshire.oc2.uk/a/6xc>

Photo 14 - <https://carmarthenshire.oc2.uk/a/6xw>

Photo 15 - <https://carmarthenshire.oc2.uk/a/6xf>

Photo 16 - <https://carmarthenshire.oc2.uk/a/6xg>

Photo 17 - <https://carmarthenshire.oc2.uk/a/6xh>

Photo 18 - <https://carmarthenshire.oc2.uk/a/6xx>

Photo 19 - <https://carmarthenshire.oc2.uk/a/6xj>

Photo 20 - <https://carmarthenshire.oc2.uk/a/6xk>

Site Plan - <https://carmarthenshire.oc2.uk/a/6xz>

Legend - <https://carmarthenshire.oc2.uk/a/6xm>

Email redacted - <https://carmarthenshire.oc2.uk/a/6zv>

6055

Object

Document Element: MACM/SeC6/c**Respondent:** Mr Aled Francis**Summary:**

Yn gwrthwynebu cynnwys y safle, gan nodi pryderon ynghylch yr iaith Gymraeg, draenio a llifogydd, cynnydd mewn traffig, agosrwydd at SoDdGA (Safle o Ddiddordeb Gwyddonol Arbennig), colli cymeriad ac amwynder, a gorddatblygu'r anheddiad.

Objects to the inclusion of the site, citing concerns regarding the welsh language, drainage and flooding, increased traffic, proximity to a SSSI, loss of character, amenity and over development of the settlement.

Change suggested by respondent:

Dileu'r safle o'r Cynllun

Remove the site from the Plan

Attachments:

Video 1 - <https://carmarthenshire.oc2.uk/a/6k6>

Video 2 - <https://carmarthenshire.oc2.uk/a/6k7>

Photo 1 - <https://carmarthenshire.oc2.uk/a/6k8>

Photo 2 - <https://carmarthenshire.oc2.uk/a/6k9>

Photo 3 - <https://carmarthenshire.oc2.uk/a/6kv>

Photo 4 - <https://carmarthenshire.oc2.uk/a/6kb>

Photo 5 - <https://carmarthenshire.oc2.uk/a/6kc>

Photo 6 - <https://carmarthenshire.oc2.uk/a/6kd>

Photo 7 - <https://carmarthenshire.oc2.uk/a/6kw>

email representation redacted - <https://carmarthenshire.oc2.uk/a/6mb>

email cover redacted - <https://carmarthenshire.oc2.uk/a/6mc>

6009

Object

Document Element: MACM/SeC6/c**Respondent:** Sian Hinton**Summary:**

Objects to MACM/SeC6/c citing concerns regarding Flood Risk and Drainage Constraints, Biodiversity and Ecological Impact, Impact on the Rural Landscape and Urban Sprawl, Cumulative Development Impact, Traffic, Congestion and Highway Safety, Previous Planning Assessments and Proximity to Environmentally Sensitive Areas.

Change suggested by respondent:

Remove MACM/SeC6/c

Attachments:

Email redacted - <https://carmarthenshire.oc2.uk/a/6zj>

Representation letter redacted - <https://carmarthenshire.oc2.uk/a/6zk>

Support

Summary of representations:

The respondent supports the inclusion of housing allocation SeC6 (iii) Land at Fforest Road and [as landowner / developer] state that they will deliver in line with the trajectory.

Summary of representation changes to plan:

No change to Plan.

Response:

Support welcomed.

Action:

No change to Plan.

6002**Support**

Document Element: MACM/SeC6/c

Respondent: Persimmon Homes West Wales

Summary:

Persimmon Homes supports the inclusion of SeC6 (iii) Land at Fforest Road and will deliver in line with the trajectory

Change suggested by respondent:

No change to the plan

Attachments:

Cover email - <https://carmarthenshire.oc2.uk/a/6m6>

Representation form redacted - <https://carmarthenshire.oc2.uk/a/6m8>

MACM/SeC6/f

Object

Summary of representations:

The respondents reference and object to site MACM/SeC6/f citing such issues as drainage, and the potential impacts on the local highway network, local services/amenity, and biodiversity. However, this reference relates to the housing allocation SeC6/h6, which has already been built out and has been identified as a commitment as a matters arising change. It is likely that the respondent is actually objecting to MACM/SeC/c, which is the new housing allocation SeC6/(iii) which lies immediately adjacent to SeC/h6.

Summary of representation changes to plan:

Removal of new housing allocation SeC6/(iii) from the Plan.

Response:

The new housing allocation SeC6(iii) was included as an additional site during the Examination. It has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared, and any potential constraints have been considered.

Action:

No change to Plan.

5962

Object

Document Element: MACM/SeC6/f

Respondent: Lyndon Kervin

Summary:

In previous consultations there has been much discussion and evidence of continuing excessive water problems at the site. It makes no sense whatsoever to exacerbate the situation with more housing - see pictures attached of flooding in recent months.

Change suggested by respondent:

Retain land for agricultural purposes thereby protecting the environment.

Attachments:

estuary flooding 011225 3pm.jpg - <https://carmarthenshire.oc2.uk/a/6gm>

estuary flooding 091225 8.30am.jpg - <https://carmarthenshire.oc2.uk/a/6gn>

estuary flooding 151225 11.30am.jpg - <https://carmarthenshire.oc2.uk/a/6gy>

estuary with no flooding.jpg - <https://carmarthenshire.oc2.uk/a/6gp>

5966

Object

Document Element: MACM/SeC6/f**Respondent:** Miss Andrea Mckay**Summary:**

Traffic is the biggest concern with safety congestion and already existing problems with junction 48. Council previously took the view that there was adequate residential land. The wet land contains known drainage constraints.

Change suggested by respondent:

There should not be any further development of this site as the current traffic situation in Pontardulais and connectivity to the m4 a4138 is already under too much pressure. The flooding and spring issue already in clos benallt fawr is in adequate for future development.

Attachments: None

5970

Object

Document Element: MACM/SeC6/f**Respondent:** Mr Aled Francis**Summary:**

I object to sites SR/069/001 and SR/069/003 in Fforest for inclusion in the Carmarthenshire LDP. The council previously judged no extra land was needed; priority should be reusing empty homes, and recent Clos Benallt expansion has not supported local people or the Welsh language. The land is unsuitable: wet, spring-fed, with known drainage failures, sinking foundations and flood risk, contrary to TAN 15. Existing attenuation has already failed. Further development would worsen severe traffic congestion (TAN 18), harm residents, and threaten an adjacent SSSI. It would erode countryside character (TAN 5) and overburden already stretched infrastructure in this area.

Change suggested by respondent:

Amend the LDP by removing sites SR/069/001 and SR/069/003 and reassessing housing need in Fforest, prioritising reuse of empty properties. Require a robust local-needs policy with enforceable occupancy criteria and a Welsh language impact assessment under TAN 18. Undertake ground, drainage and flood-risk investigations compliant with TAN 15, and reject proposals where attenuation cannot prevent flooding. Introduce a full transport assessment with mitigation to reduce congestion and unsafe access. Protect the adjacent SSSI and retain established pasture boundaries in line with TAN 5, while adopting construction management measures and cross-boundary coordination with Swansea. Ensure infrastructure capacity is demonstrated approval.

Attachments:Photo 1 - <https://carmarthenshire.oc2.uk/a/6gq>Photo 2 - <https://carmarthenshire.oc2.uk/a/6hr>Photo 3 - <https://carmarthenshire.oc2.uk/a/6hs>Photo 4 - <https://carmarthenshire.oc2.uk/a/6ht>Photo 5 - <https://carmarthenshire.oc2.uk/a/6jn>Photo 6 - <https://carmarthenshire.oc2.uk/a/6jy>Photo 7 - <https://carmarthenshire.oc2.uk/a/6jp>Video 1 - <https://carmarthenshire.oc2.uk/a/6jq>Video 2 - <https://carmarthenshire.oc2.uk/a/6kr>

5963

Object

Document Element: MACM/SeC6/f**Respondent:** Mr Aled Francis**Summary:**

I object to sites SR/069/001 and SR/069/003 in Fforest for inclusion in the Carmarthenshire LDP. The council previously judged no extra land was needed; priority should be reusing empty homes, and recent Clos Benallt expansion has not supported local people or the Welsh language. The land is unsuitable: wet, spring-fed, with known drainage failures, sinking foundations and flood risk, contrary to TAN 15. Existing attenuation has already failed. Further development would worsen severe traffic congestion (TAN 18), harm residents, and threaten an adjacent SSSI. It would erode countryside character (TAN 5) and overburden already stretched infrastructure in this area.

Change suggested by respondent:

Amend the LDP by removing sites SR/069/001 and SR/069/003 and reassessing housing need in Fforest, prioritising reuse of empty properties. Require a robust local-needs policy with enforceable occupancy criteria and a Welsh language impact assessment under TAN 18. Undertake ground, drainage and flood-risk investigations compliant with TAN 15, and reject proposals where attenuation cannot prevent flooding. Introduce a full transport assessment with mitigation to reduce congestion and unsafe access. Protect the adjacent SSSI and retain established pasture boundaries in line with TAN 5, while adopting construction management measures and cross-boundary coordination with Swansea. Ensure infrastructure capacity is demonstrated approval.

Attachments: None

5973

Object

Document Element: MACM/SeC6/f**Respondent:** Miss Bronwen Hill**Summary:**

I object to the proposed housing development on the field adjacent to Clos Benallt Fawr, Fforest Road. This green space is important for local wildlife and helps maintain the rural character of the area. The development would significantly increase traffic on Fforest Road, which already experiences congestion. When the M4 Hendy junction is closed due to accidents, roadworks or diversions, traffic is redirected through Fforest Road, causing major delays and disruption for residents. Additional housing would worsen these problems. I am also concerned about drainage, flooding risks and increased pressure on local schools, healthcare services and other infrastructure.

Change suggested by respondent:

The plan should be amended to remove the proposed housing allocation from this site. This field provides an important area of open space between existing residential development and the surrounding countryside and contributes to the character of the local area. Retaining the land in its current form would help preserve the area's identity and prevent further urbanisation of the landscape. The site should remain undeveloped and continue to serve as a valuable green space for the benefit of current and future generations. Removing the allocation would better reflect the wishes and concerns of local residents and protect the community's environment.

Attachments: None

5976

Object

Document Element: MACM/SeC6/f**Respondent:** Miss Sara Hill**Summary:**

I object to the proposed housing development on the field adjacent to Clos Benallt Fawr, Fforest Road. This green space is important for local wildlife and helps maintain the rural character of the area. The development would significantly increase traffic on forest Road, which already experiences congestion. When the M4 Hendy junction is closed due to accidents, roadworks or diversions, traffic is redirected through forest Road, causing major delays and disruption for residents. Additional housing would worsen these problems. I am also concerned about drainage, flooding risks and increased pressure on local schools, healthcare services and infrastructure

Change suggested by respondent:

Change to plan -

The plan should be amended to remove the proposed housing allocation from this site. This field provides an important area of open space between existing residential development and the surrounding countryside and contributes to the character of the local area.

Retaining the land in its current form would help preserve the area's identity and prevent further urbanisation of the landscape. The site should remain undeveloped and continue to serve as a valuable green space for the benefit of current and future generations.

Removing the allocation would better reflect the wishes and concerns of local residents and protect the community's environment.

Attachments: None

6008

Object

Document Element: MACM/SeC6/f**Respondent:** Lyndon Kervin**Summary:**

Whilst the respondent refers to MACM/SeC6/f in his objection, the actual objection is for the site to the rear i.e additional site MACM/SeC6/c citing concerns regarding flooding on the site.

Change suggested by respondent:

Remove MACM/SeC6/f from the Plan

Attachments:

Estuary Photo 1 11:30am - <https://carmarthenshire.oc2.uk/a/6jt>

Estuary Photo 2 3pm - <https://carmarthenshire.oc2.uk/a/6j3>

Estuary Photo 3 8:30am - <https://carmarthenshire.oc2.uk/a/6j4>

Email redacted - <https://carmarthenshire.oc2.uk/a/6zg>

5978

Object

Document Element: MACM/SeC6/f

Respondent: Mr Kallum Hayward

Summary:

Representation summary -

I object to the proposed housing development on the field adjacent to Clos Benallt Fawr, Fforest Road. This green space is important for local wildlife and helps maintain the rural character of the area. The development would significantly increase traffic on forest Road, which already experiences congestion. When the M4 Hendy junction is closed due to accidents, roadworks or diversions, traffic is redirected through forest Road, causing major delays and disruption for residents. Additional housing would worsen these problems. I am also concerned about drainage, flooding risks and increased pressure on local schools, healthcare services and infrastructure.

Change suggested by respondent:

Change to plan -

The plan should be amended to remove the proposed housing allocation from this site. This field provides an important area of open space between existing residential development and the surrounding countryside and contributes to the character of the local area.

Retaining the land in its current form would help preserve the area's identity and prevent further urbanisation of the landscape. The site should remain undeveloped and continue to serve as a valuable green space for the benefit of current and future generations.

Removing the allocation would better reflect the wishes and concerns of local residents and protect the community's environment.

Attachments: None

MACM/PrC3/d**Support**

Summary of representations:

 Supports inclusion of the site.

Summary of representation changes to plan:

 No change to the plan.

Response:

 Support welcomed.

Action:

 None.

5980**Support**

Document Element: MACM/PrC3/d

Respondent: Cerith Lewis

Summary:

 Supports inclusion of the site

Change suggested by respondent:

 No change.

Attachments:

Cerith Lewis - <https://carmarthenshire.oc2.uk/a/6kn>

5982**Support**

Document Element: MACM/PrC3/d

Respondent: Adrian Pugh

Summary:

 Supports inclusion of the site

Change suggested by respondent:

 No change to plan.

Attachments:

Submission - <https://carmarthenshire.oc2.uk/a/6kq>

5. Representation and the Council Response made to the Habitats Regulation Assessment - Addendum to the Matters Arising Changes

Respondent Number	Representation number	Representor	Representation Summary	Council Response	Action
4665	1	Mr Craig Jones (JCR Planning Ltd)	This representation comprises a generic objection to the MACs and HRA and calls for the progression of the Revised Carmarthenshire Local Development Plan (LDP) 2018 – 2033 to be paused. It is submitted that the plan cannot currently meet the statutory ‘tests of soundness’, specifically regarding Test 2 (Appropriateness) and Test 3 (Deliverability), until the outstanding Habitats Regulations Assessment (HRA) issues concerning Special Areas of Conservation (SAC) nutrient failures are fully resolved, with absolute legal and scientific certainty. Proceeding with the LDP under the current climate of regulatory uncertainty, potentially means the adoption of a fundamentally flawed and legally vulnerable document. The current trajectory of the LDP will result in significant land use vulnerabilities and considerable economic risk. Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017, the Council, and by extension PEDW during examination, must act as the "competent authority." The law mandates that a land use plan can only be given effect if it has been established that it will not adversely affect the integrity of a European site, either alone or in combination with other plans or projects. This representation is made within the context of:- i) the Precautionary Principle: The European Court of Justice (ECJ) case law dictates that an appropriate assessment cannot rely on speculative, future, or unproven mitigation measures.	Noted. The Plan, and its supporting document including the HRA have been subject to an ongoing examination which seeks to consider a range of matters including the tests of soundness. Whilst the comments in relation to nitrates is noted the Council has sought to provide the Inspectors with supporting clarity and information to enable them to consider the matters with appropriate confidence. It is also noted that the WG have provided as part of the examination a statement in relation to nutrients and notably soundness	No action

			ii) the Carmarthenshire Context: Significant portions of the LDP's growth allocations fall within the nitrate affected river catchments. As the strategic framework to definitively offset these nutrients is not yet fully operational, the HRA accompanying this LDP cannot eliminate reasonable scientific doubt. Therefore, the plan fails the fundamental legal threshold required by the Habitats Regulations. An HRA must account for in-combination effects - allocating thousands of new homes and commercial sites while river systems are failing their nutrient targets, and while marine catchments face strict requirements for nitrate neutrality, creates an irreconcilable statutory conflict. Advancing a plan that relies on 'speculative' or as yet unproven mitigation strategies, fails the precautionary principle enshrined in environmental law and leaves the LDP highly vulnerable to successful judicial review. At the recent 'LDP2 Exploratory Meeting' convened by Pembrokeshire County Council, evidence was presented which suggested that a policy framework for dealing with nitrates would be available by the spring of 2027. For the sake of a few months, would it not be prudent to await this framework, in order to obtain a full and complete understanding of the expected costs for each affected housing site, which will have implications for affordable housing provision viability, etc.? To be declared "sound", an LDP must be realistic and deliverable. Currently, a significant portion of the proposed housing sites are in the south of the county and are impeded by nutrient-sensitive river catchments.	test 3 clarification on the 12th January 2026.	
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6. Representation and the Council Response made to the Integrated Sustainability Assessment - Addendum to the Matters Arising Changes

Respondent Number	Representation number	Representor	Representation Summary	Council Response	Action
5251	2	Dylan Bryn Roberts (Dyfodol i'r laith)	Adendwm Arfarniad Cynaliadwyedd Integredig ar gyfer Newidiadau yn sgil Materion a Godwyd. Atodiad B. Arfarniad Cynaliadwyedd Integredig o Bolisiâu Newydd. Rydym yn gwrthwynebu pob newid sgôr PSD7 'Diogelu Cyfleusterau Cymunedol' yn erbyn pob un o'r pwyntiau uchod lle rydym wedi datgan gwrthwynebiad Integrated Sustainability Appraisal (ISA) addendum to the MACs Appendix B. ISA of New Policies We object to every score change relating to PSD7 'Protection of Community Facilities' in respect of all of the points above where we have stated an objection.	Nodwyd y gwrthwynebiad. Fodd bynnag, nid yw'r Ymatebydd wedi darparu gwybodaeth i alluogi ystyriaeth bellach i ailystyried y sgorio. The objection is noted. However, the Respondent has not provided information to enable further consideration given to reconsidering the scoring.	Dim gweithred. No action

7. Not Duly Made Representations

Respondent Name	Comments
Anne Evans	The Respondent objects to the inclusion of allocated site referenced SuV20/h1. There were no MACs which relate to this site. The representation is therefore not duly made.
Glanville Evans	The Respondent objects to the inclusion of allocated site referenced SuV20/h1. There were no MACs which relate to this site. The representation is therefore not duly made.
Rhys Walters	The Respondent seeks the inclusion of a new site and submits additional information in support of its inclusion. There were no MACs which relate to this site or its omission. The representation is therefore not duly made.
Marion Birrell	Whilst referring to MAC013 and the committed site opposite her own site, the Respondent objects to the omission of a site which has been previously allocated but does not form part of the MAC consultation. The representation is therefore not duly made.
Chris Davies	The Respondent cites MAC 010 noting their objection to the scale of development proposed in housing allocation SeC6/h2 in Fforest. This housing allocation is not the subject of a MAC. Furthermore, MAC 010 relates to amendments made to Policy SD1 Development Limits which do not seem relevant to the comments submitted. The representation is therefore not duly made.