

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

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**SCHEDULE OF MATTERS, ISSUES AND QUESTIONS**

**Matter 5: Healthy Habits – Natural, Built and Historic Environment**

*Issue: Does the Plan provide a framework for the management of the built, historic and natural environment that is soundly based, justified and consistent with the requirements of national policy?*

*Natural Environment*

**1. Does Policy SP14 provide a clear and consistent framework for maintaining and enhancing the natural environment? And is it consistent with national planning policy?**

Reference is made to the Council's response to the Inspector's initial questions in relation to PPW (ed.12) and notably the changes in relation to Chapter 6. The response considers the alignment of SP14: Maintaining and Enhancing the Natural Environment with national planning policy and identifies a number of changes to ensure ongoing consistency. In addition, it also proposed to insert the words 'and irreplaceable natural resources.' after the word species at the end of the 3<sup>rd</sup> paragraph of the policy.

The policy sets the strategic framework for the maintenance and enhancement of the natural environment. This when read and used in conjunction with the other relevant policies of the Plan sets a clear and consistent framework for decision making.

**2. Are the requirements of Policies NE2 clear and consistent with national planning policy?**

Reference is made to the Council's response to the Inspector's initial questions in relation to Planning Policy Wales Edition 12 and notably the changes in relation to Chapter 6. The response considers the alignment of NE2: Biodiversity with national planning policy and identifies a number of changes to ensure ongoing consistency. In addition, and to add clarity to that response the following proposed amendments are identified:

- In criterion i replace 'mitigation hierarchy' with 'step-wise approach'.
- Amend criterion ii to include 'and ensure a Net Benefit for Biodiversity' after the word 'proposals'.

**3. What is the purpose of Policy NE4? and is it consistent with the requirements of national policy and the Habitat and Species Regulations 2017 (as amended)?**

Yes, Policy NE4 is consistent with national planning policy. In alignment with The Conservation of Habitats and Species Regulations 2017 (as amended), this policy has been included in the plan with the intention of avoiding effects on specific European site(s) whose qualifying features may otherwise be affected by the plan being implemented. As supported by the Caeau Mynydd Mawr Supplementary Planning Guidance (SPG) (Submission Document CSD87) which is proposed to be adopted concurrent with the Plan, the Council will (where appropriate) give priority to securing obligations in respect of the Caeau Mynydd Mawr SAC for proposals located within the CMM SPG Area to ensure the plan remains compliant with the Habitats Regulations.

In the interests of clarity, it is proposed to insert 'and Conservation of Habitats and Species Regulations 2017 (as amended)' after 'habitat regulations' in the first part of the policy.

As part of the formulation of the SPG and policy NE4 evidence papers have been prepared in respect of: Payment Mitigation Calculation (CSD046), Habitat management Specification and Monitoring Success (CSD047) and Defining the Revised SPG Area (CSD048).

**4. Should the boundary of Caeau Mynydd Mawr SPG area contained in policy NE4 be amended to include part of the land off Heol Brown, Tycroes (ref AS2/159/002)?**

No, the boundary for the Caeau Mynydd Mawr SPG has been based on robust evidence as set out in Submission Document CSD48 Evidence Paper on defining the SPG area. This sets out a clear methodology for the definition of the boundary as applied in respect of the Revised LDP policy NE4.

**5. Does the framework provided by Policies NE5, NE6 and NE7 provide an appropriate mechanism for managing development in coastal locations?**

The coastal management and development policies seek to ensure that any development undertaken in coastal areas is necessary and is done so in an appropriate manner and is in line with PPW. It is considered that three policies are necessary to ensure that different elements of coastal development are appropriately managed.

Policy NE5 relates specifically to coastal management schemes and seeks to ensure that proposals for coastal management schemes are appropriately designed and implemented. Policy NE6 relates to all development within coastal area and seeks to ensure that they are appropriate and have considered matters associated

with coastal change. Both these policies are very similar to the policies contained in the adopted LDP which has been successfully implemented.

PPW seeks to ensure that development plans provide specific policies to manage development in areas where coastal defences will no longer be maintained, as set out in Shoreline Management Plans (SMP). Policy NE7 is a new policy and seeks to address areas impacted by the policies of the SMP. There are a number of areas designated as “managed realignment” and “no active intervention” within the SMP, and this policy seeks to provide a framework to appropriately manage development in these areas.

It is considered that all three policies will provide an appropriate mechanism for appropriately managing the differing types of development likely to occur in coastal locations.

### ***Built and Historic Environment***

#### **6. Does Policy SP15 provide a clear and consistent framework for the protection and enhancement of the built and historic environment?**

Yes, Policy SP15 provides a clear and consistent framework for the protection and enhancement of the built and historic environment. The policy explicitly requires that development proposals preserve or enhance the built and historic environment, including cultural, townscape, and landscape assets, and their settings. It promotes high-quality design that reinforces local character and respects the cultural and historic qualities of the area.

The policy is well-integrated with existing legislation and other planning provisions, such as PPW and Strategic Policy SP14, which helps ensure consistency and coherence in its application. Additionally, it recognises the impact that changes to the setting can have on historic assets and commits to developing Supplementary Planning Guidance (SPG) to further support its implementation. This comprehensive approach underscores the policy's clarity and its commitment to maintaining the integrity of Carmarthenshire's historic and built environment.

#### **7. Is Policy BHE1 locally distinct or does it replicate the requirements of national planning policy?**

Policy BHE1 aligns with national policy requirements while incorporating Carmarthenshire's unique characteristics. Planning Policy Wales (Edition 12) emphasises the importance of preserving or enhancing Conservation Areas and Listed Buildings, and Policy BHE1 expands on this by integrating Carmarthenshire's local distinctiveness. While the core principles of Policy BHE1 align closely with national policy, its local distinctiveness lies in how the policy is interpreted and is applied in the context of specific local heritage assets or conservation areas. A Built and Historic Environment Supplementary Planning Guidance (SPG) will be

developed to provide further details and support the Plan and its policies. For additional information, see document CSD66 Position Statement – Supplementary Planning Guidance.

**8. Does Policy BHE2 provide an appropriate mechanism for the managing the impact of development on the landscape and visual qualities of the County?**

The Revised LDP recognises the wider landscape quality of the County through BHE2 and the preparation of a landscape character assessment as a means of informing not only the respective qualities of our landscapes but also in providing clear guidance decision making and the management of development. This approach is in line with PPW Ed.12 in that it provides for the conservation and, where appropriate, enhancement of local landscapes and provision for policies for landscape features, characteristics and qualities of local significance. It will also identify which features, characteristics or qualities which require extra protection, utilising LANDMAP and any associated landscape character assessments (including the register of historic landscapes in Wales).

These Landscape Character Areas will be defined through Supplementary Planning Guidance (SPG) currently under preparation and will be consulted on prior to its adoption concurrent with the Revised LDP. Specific reference is made to the position statement on SPG (Submission Document CSD66).

It should be noted that Appendix 3 of the Revised LDP in relation to SPG will need to be amended to reflect its revised adoption date.

Whilst it is considered that BHE2 as set out within the 2<sup>nd</sup> Deposit LDP is satisfactory as a mechanism in managing the impact of development on the landscape, the preparation of the Landscape Character Assessment (LCA) along with its methodology and outputs has necessitated a review of the policy. In this respect a revision to the policy and its supporting text is proposed. This will ensure it better reflects the emerging assessment and landscape management and decision-making that's reflects the content of the LCA. The amended policy BHE2 is set out in Appendix A of this hearing session statement.

**9. Should the Plan contain a policy which designates special landscape areas?**

No. The potential to designate special landscape areas (SLAs) is noted, however these represent a non-statutory local designation. In this respect there is no requirement on the authority to designate them which also reflects that they are not consistently designated across Wales.

The Revised LDP however contains clear recognition of the County's landscape quality, recognising that this quality extends beyond the areas defined as SLAs in the current adopted LDP. Consequently, and in recognition of the wider landscape quality across the County the plan and its landscape policies will be accompanied by a Landscape Character Assessment (adopted as Supplementary Planning Guidance).

This approach is in line with PPW Ed.12 in that it provides for the conservation and, where appropriate, enhancement of local landscapes and provision for policies for landscape features, characteristics and qualities of local significance. It will also identify which features, characteristics or qualities require extra protection, utilising LANDMAP and any associated landscape character assessments (including the register of historic landscapes in Wales).

These areas will be defined through the forthcoming SPG currently under preparation – this will be consulted on prior to its adoption concurrent with the Revised LDP. Reference is made to the Position Statement on SPG (Submission Document CSD66).

It should be noted that Appendix 3 of the Revised LDP in relation to SPG will need to be amended to reflect its revised adoption date.

### ***Provision of Outdoor Space***

#### **10. Are the requirements of Policies PSD7 and PSD8 based on robust and credible evidence? Are the policies clearly expressed and consistent with national planning policy?**

The requirements of Policies PSD7 and PSD8 are informed by detailed assessments specific to Carmarthenshire, such as the Carmarthenshire Open Space Assessment (CSD23) and the Carmarthenshire Green and Blue Infrastructure Assessment (CSD28). These documents provide a comprehensive overview of the existing provision, accessibility, and quality of open spaces across the county. The policies are designed to address identified needs and deficiencies, ensuring that the local community has access to adequate and high-quality open spaces. This evidence-based approach is crucial for tailoring policies to the specific context and needs of Carmarthenshire.

Additionally, the policy allows for flexibility by considering changing demographic patterns, the condition of existing facilities, and local needs. The requirement for applicants to demonstrate compliance through alternative provision or financial contributions further strengthens the policies' evidence-based framework, ensuring that decisions are informed by local data and analysis.

The policies are clearly expressed, outlining specific criteria under which the loss of open space might be permissible and how new developments should contribute to

open space provision, detailing conditions such as equivalent value, accessibility, and the necessity of financial contributions.

Regarding consistency with national planning policy, both PSD7 and PSD8 align well with the broader goals of national frameworks, and are in accordance with Planning Policy Wales, Technical Advice Note 16: sport, recreation and open space (TAN16) and the Guidance for Outdoor Sport and Play Beyond the Six Acre Standard (FIT Standards). Planning Policy Wales emphasises the importance of protecting open spaces, ensuring access to high-quality green spaces, and encouraging developments that promote health, well-being, and sustainability. The Revised LDP policies echo these national objectives by prioritising the protection, enhancement, and creation of open spaces and by recognising their multifaceted role in community life, biodiversity, and climate resilience. An SPG on Provision of Open Space in New Developments is currently being developed, reference is made to the Position Statement for Supplementary Planning Guidance (CSD66).

**11. Should land in Glanamman (Ref AS2/064/005 and AS2/064/006) be identified as public and / or community space?**

Whilst the Plan does not identify areas specifically as public or community space, the identified open space provision in the County (as covered under Policy PSD7) is mapped and assessed within the Carmarthenshire Open Space Assessment. The site in question has not been identified within this assessment. The Open Space Assessment has been prepared in accordance with the guidance set out within the Guidance for Outdoor Sport and Play Beyond the Six Acre Standard (FIT Standards) which considers that only the availability of facilities or land which is routinely available to the public in the assessment of available open space should be included when considering the quantity of local provision.

Whilst it is acknowledged that there may be additional areas of open space which are not reflected in the Assessment which might potentially make a contribution towards the provision of open space within a community, as far as the Council is aware, the site(s) in question are in private ownership. Moreover, such areas would need the permission of the landowner to be accessed and utilised by the public. The Council has not been approached by the landowner(s) in regard to any intention to have the site(s) identified as open space.

## **Appendix A**

Reference is made to question 8 of this hearing session statement and to the Council's response thereto. The following sets out the proposed amendments to Policy BHE2 in light of the response to the question above.

### **BHE2: Landscape Character**

**Development proposals which are within or would result in potential effects to areas of identified value for visual landscape character and scenic quality and/ or historic or cultural landscape character, shall:**

- a) not result in significant adverse impacts, including cumulative impacts, to features or settings of importance to the historic and cultural landscape character of the local area**
- b) not result in significant adverse impacts, including cumulative impacts, to the visual landscape character and scenic quality of the local area, including key landscape views and vistas**
- c) contribute positively to the landscape and visual character through high quality design of built form which relates and responds to positive examples of local distinctive character through form, scale, dimensions, materials, detailing, colour, and finishes.**
- d) contribute positively to the landscape and visual character through high quality layout and landscape design which relates and responds to local distinctive character through planting types and species, and hard landscape materials and detailing**
- e) preserve and enhance or restore existing landscape character features and patterns formed by landscape types, tree cover, field boundaries, hedgerows, banks and stonewalls and integrate these features into layout and landscape design schemes.**

11.454 Carmarthenshire is characterised by diverse and high-quality landscape resources and areas of identified value for visual landscape character and scenic quality and/ or historic or cultural landscape character. LANDMAP aspect area evaluations and landscape and historical designations will be used as a baseline for context for the application of policy BHE2 Landscape Character.

Note: LANDMAP is a Geographical Information System based landscape resource where landscape characteristics, qualities and influences on the landscape are recorded and evaluated into a nationally consistent data set.

11.455 The policy will be supported by a Landscape Character Assessment through Supplementary Planning Guidance (SPG). This SPG will define specific Landscape Character Areas which build upon LANDMAP aspect area evaluations and landscape and historical designations to provide a baseline tool for identifying the patterns and individual combinations of features that define a recognisable 'sense of place' which make each Landscape Character Area distinct. The SPG will

include an overall evaluation of value for visual landscape character and scenic quality, and historic or cultural landscape character to refine the context for the application of policy BHE2 Landscape and Visual Character. The SPG will set out Planning and Development Advice for Landscape Character Areas based upon Landscape Types.

11.456 The Authority area includes parts of one nationally designated area (Brecon Beacons National Park) and is in relative proximity to adjacent nationally designated areas, such that development may result in potential landscape and visual effects. (Pembrokeshire Coast National Park and Gower Area of Outstanding Natural Beauty (AONB)). These designations represent areas of identified value for visual landscape character and scenic quality and/ or historic or cultural landscape character and will be addressed within the SPG.

11.457 The Authority area includes areas identified within the Register of Landscapes of Outstanding Historic Interest (Tywi Valley HLW[D] 5; Preseli HLW[D] 7; Dolaucothi HLW[D] 8; and Taf and Tywi Estuary HLW[D] 9) and the Register of Landscapes of Special Historic Interest (Drefach and Felindre HLW[D] 10; Lower Teifi Valley HLW[D] 14). These areas are specifically of identified value for historic or cultural landscape character and will be addressed within the SPG.

11.458 The Authority area includes areas identified within The Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales.