



Adroddiad i Gyngor Sir Gâr

Report to Carmarthenshire County Council

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Arolygwyr a benodir gan Weinidogion Cymru

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 64

**REPORT ON THE EXAMINATION INTO THE
REVISED CARMARTHENSHIRE LOCAL DEVELOPMENT
PLAN 2018 - 2033**

Plan submitted for examination on 10 June 2024

Examination hearings held between 15 October and 26 November 2024, and on 17 and 18 September 2025.

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List of Abbreviations

AA	Appropriate Assessment
A/RLDP	Adopted / Revised Local Development Plan
BMVAL	Best and Most Versatile Agricultural Land
CCMA	Coastal Change Management Area
DPM	Development Plans Manual, Edition 3 (March 2020)
DCWW	Dwr Cymru / Welsh Water
EqIA	Equalities Impact Assessment
E(W) Act	Environment (Wales) Act 2016
FMfP	Flood Map for Planning
FVR	Financial Viability Report
FW	Future Wales – The National Plan 2040
GBI	Green and Blue Infrastructure
GTANA	Gypsy and Travellers Accommodation Needs Assessment
HMA	Housing Market Areas
HR	Housing Requirement
HS	Housing Supply
HRA	Habitats Regulations Assessment
I/SA	Integrated / Sustainability Appraisal
LCA	Landscape Character Assessment
LHMA	Local Housing Market Assessment
LSA	Local Search Area
LSE	Likely Significant Effects
MAC	Matters Arising Change
N/LNR	National / Local Nature Reserve
NN	Nutrient Neutrality for Nitrogen
NRW	Natural Resources Wales
PPW	Planning Policy Wales, Edition 12 / February 2024
psm	Per Square Metre
RLCEA	Renewable and Low Carbon Energy Assessment
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
S/FCA	Strategic / Flood Consequences Assessment
SuDs	Sustainable Urban Drainage Schemes
SPA	Special Protection Area
SPG	Supplementary Planning Guidance
SLA	Special Landscape Area
SSSI	Site of Special Scientific Interest
TAN	Technical Advice Note
LDP Regulations	The Town & Country Planning (Local Development Plan) (Wales) Regulations 2005
WBFG Act	Well-being of Future Generations (Wales) Act 2015
WEMS	Welsh European Marine Site
WG	Welsh Government
WWTW	Waste Water Treatment Works

Non-Technical Summary

This report concludes that, subject to the recommended Matters Arising Changes (MACs) set out in Appendix A, the Revised Carmarthenshire Local Development Plan (RLDP or the Plan) provides an appropriate basis for the planning of the County up to 2033. The RLDP has sufficient evidence to support the strategy and has shown that it has a realistic prospect of being delivered.

A number of changes are needed to meet legal and statutory requirements and to ensure that the Plan is sound. These do not alter the thrust of the Council's overall strategy and do not undermine the sustainability appraisal (SA) carried out by the Council. The main changes are summarised as:

- Amendments to the Plan's Strategic Framework to explain the national and regional development context;
- An increase in the supply of housing land over the Plan period from 9,704 to 9,814 dwellings and resultant changes to the housing trajectory and flexibility allowance;
- Alterations to the housing site allocations, including the identification of 14 additional allocated and 16 additional committed sites;
- An increase in the Plan-wide affordable housing target from 1,900 to 2,111 dwellings to reflect changes in the supply of housing land;
- The inclusion of a new policy for the management of housing density;
- Amendments to Policies CCH4 and INF4 and the monitoring indicators to provide a framework for the management of nutrients within riverine and marine SACs;
- The inclusion of a schedule which outlines the policy requirements and constraints in respect of each allocated housing and employment site;
- Amendments to the Policies SP8 and WL1 to provide a framework assessing and mitigating the effect of development on the Welsh language;
- Revision of Policy BHE2 to provide an effective framework for the conservation and enhancement of Carmarthenshire's distinct landscapes and seascapes;
- Amendments to Policy MR3 and the proposals map to set out criteria for the assessment of development proposals and identify safeguarded areas;
- The deletion of policy requirements in relation to historic assets of special local importance, conservation areas and listed buildings to ensure the Plan complies with the requirements of national policy.

Almost all of the recommended changes have been put forward by the Council in response to matters discussed during the examination. With the recommended changes the Plan satisfies the requirements of section 64(5) of the 2004 Act and meets the tests of soundness set out in the Development Plans Manual.

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Appendix A: Schedule of Matters Arising Changes (MACs) proposed by the Council

1 Introduction

- 1.1. Under the terms of Section 64(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a Local Development Plan is to determine:
 - a) whether it satisfies the requirements of sections 62 and 63 of the Planning & Compulsory Purchase Act 2004 and of regulations under section 77, and
 - b) whether it is sound.
- 1.2. This report contains the assessment of the RLDP in terms of the above matters, along with recommendations and the reasons for them, as required by section 64(7) of the 2004 Act.
- 1.3. The submitted RLDP has been prepared pursuant to the Planning & Compulsory Purchase Act 2004 and the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended) (LDP Regulations). We have considered it against the tests of soundness set out in Section 6, Table 27 of the Development Plans Manual, Edition 3 (March 2020) (DPM). There are three tests:
 - **Test 1: Does the plan fit** – is it clear that the LDP is consistent with other plans?
 - **Test 2: Is the plan appropriate** - is the plan appropriate for the area in the light of the evidence? and
 - **Test 3: Will the plan deliver** - is it likely to be effective?
- 1.4. In addition, we must be satisfied that the plan preparation process has complied with all legal and regulatory procedural requirements including the SA, habitat regulations assessment (HRA) and so on.
- 1.5. The starting point for the examination is that the Council has submitted what it considers to be a sound plan, together with the evidence base that supports its position.
- 1.6. Since the purpose of the examination is to determine whether the Plan is sound, we recommend changes in this report only where there is a clear need to amend the Plan in the light of the legal requirements and/or the tests of soundness. These binding changes are numbered in **bold type** and are set out in Appendix A of this report, where they are highlighted. We are satisfied that these changes are in line with the substance of the Plan and its policies, and do not undermine the SA and participatory processes that have been undertaken.
- 1.7. All duly made representations and the matters raised at the examination hearings have been considered. Given the focus of the examination on soundness, our report does not refer specifically to the individual representations made in each case. Matters raised by individual representations are referred to only where it is considered that they raise substantive issues concerning the Plan's soundness. Plan changes sought by any representor are the subject of a recommended change only where we have found, on the basis of the evidence, that such a change is required to make the Plan sound.

- 1.8. A number of representors have proposed alternative sites to those allocated in the Plan, most notably for housing development. What is required of the Council is that it produces a strategy, policies and allocations that are sound. There are likely to be several ways that the Council could meet the needs of its community, each of which may be valid. Some may consider that the allocations in the Plan do not present the best solution, but our remit is only to recommend changes where they are required to make the Plan sound. It is not our remit to seek to make a sound plan better. Our conclusions as to the submitted Plan's soundness and the changes proposed by the Council in response to matters arising have thus guided how far we have needed to consider in detail other candidate sites for allocation. For this reason, no reference is made to any of the proposed alternative sites in this report.

Post-deposit changes and changes arising during the examination

- 1.9. Prior to submission of the RLDP for examination the Council considered the representations made during the second deposit period and concluded that it was not necessary to make any focussed changes to the deposit draft Plan.
- 1.10. However, during the hearing sessions it became clear that the Plan was unlikely to deliver the scale of housing development required by Policy SP4
- 1.11. At our request the Council produced a list of sites it would prefer to be included in the Plan if it were found that additional housing allocations were required [ED8 and ED10]. The additional sites were subject to a 7-week public consultation, which was undertaken in accordance with the requirements of the Community Involvement Scheme, between 27 March and 15 May 2025. The consultation resulted in the submission of 29 duly made representations.
- 1.12. The representations received during this period were assessed and it was concluded that, in the interests of efficiency and transparency, further hearing sessions should be held to examine the additional sites.
- 1.13. The hearing sessions were held on 17 and 18 September 2025. Following the close of the hearing sessions, and having considered the evidence presented by all parties, we concluded that the additional sites proposed should be included in the Matters Arising Changes (MACs). Detailed matters in relation to the delivery of these sites are considered later in this report.

Recommended changes

- 1.14. The Council prepared a range of MACs following discussions at the hearing sessions. The schedule of MACs [ED19 and ED19a] was published on the examination website and, together with a revised integrated sustainability appraisal (ISA) and HRA [ED19b and ED19c], consulted on for a 6-week period between 11 May and 26 June 2026. We have taken account of all representations duly made during the consultation period in arriving at our final recommendations.
- 1.15. The MACs numbered in **bold type** in Appendix A are the changes put forward that are required to make the Plan sound. These are all addressed in this report, where the relevant MAC number is similarly identified in bold type.

- 1.16. The Council has also identified some outstanding typographical or factual errors in the submitted Plan that it wishes to correct. We authorise any final editorial changes of this nature, together with any other presentational matters and consequential changes flowing from agreed MACs such as altered policy cross-references, site areas or numerical changes and paragraph numberings.

Changes to national policy and guidance

- 1.17 In March 2025 the Welsh Government (WG) issued Technical Advice Note (TAN) 15 – Development, Flooding and Coastal Erosion. The revised TAN recognises the potential increase in flood events due to climate change and places an increased emphasis on LDPs as the mechanism for both allocating sites and managing new development, and for assessing flood risk and identifying appropriate flood mitigation measures. This includes the preparation of an Infrastructure Plan to support individual LDPs and to identify appropriate flood mitigation measures.
- 1.18 To address these requirements the Council has undertaken a detailed review of the allocated housing and employment sites and the Infrastructure Assessment Topic Paper [CSD78]. The review of allocated sites found that most were in Flood Zone 1, with only a small number of sites partially located in Flood Zone 2 and / or Flood Zone 3 [CSD78]. As a result, no significant revisions to the allocations have been necessary, although changes have been required to Policies SP16, HOM1 and the deletion of Policy CCH5 to ensure compliance with national policy (**MAC 081**, **MAC 076** and **MAC 013**). To provide certainty about the nature of the constraint, details of the flood risk on individual sites have, correctly, been included in the schedules of allocated housing and employment sites (**MAC 126** and **MAC 127**) and annotated on the proposals map (**MACM/FS1**, **MACM/FS2**, **MACM/FS3** and **MACM/FS4**). In addition, an addendum detailing the findings of the review has been added to the submitted Strategic Flood Consequence Assessment (SFCA) [CSD226 and ED9d]. Matters in relation to the changes to these policies are addressed in Chapter 10 of this report.
- 1.19 The review of the Infrastructure Assessment Topic Paper, which is in effect the Infrastructure Plan for Carmarthenshire, indicated that, although the paper needed to be updated to reflect the requirements of the new TAN, there were no additional infrastructure requirements at this time. We are conscious that this is a 'live' document and will be subject to revision throughout the Plan period.
- 1.20 In light of the above, we are content that the RLDP and its supporting evidence base accord with the requirements of TAN 15.
- 1.21 In addition, on 25 June 2025 Natural Resources Wales (NRW) issued a Condition Assessment of the Marine Protected Areas in Wales, which indicates that new development along parts of the Welsh coastline has the potential to increase nutrient pollution within Marine Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). This includes development in the Marine Protected Area in Carmarthenshire and the neighbouring authority of Pembrokeshire. This has serious implications for the RLDP. We therefore begin our reporting of the topics by dealing with this issue and those in relation to riverine SACs in detail.

- 1.22 Lastly, on 20 November 2025 the WG issued the 2022 - based local authority population and household projections for Wales. As such the projections provide revised statistical data in respect of the potential future size and age structure of the population and an indication of the future number of households and their composition for Carmarthenshire. The Council has reviewed the projections and has decided not to amend the housing requirement (HR) because it considers that the scale of new housing development contained in the LDP broadly aligns with the latest projections and is realistic, reflective of its aspiration to see economic growth and will assist in the delivery of affordable housing [ED 16 a and b]. On the basis of the evidence presented, we are content with the approach outlined by the Council.

2 Implications of the nutrient constraint in Riverine and Marine SACs

- 2.1 In May 2021 NRW issued revised guidance on development that had the potential to increase phosphate levels in riverine SACs. The guidance explained that over 60% of the designated waterbodies fail to meet the revised phosphorus standards and provided advice about how further deterioration in environmental capacity within nutrient sensitive riverine SACs could be avoided.
- 2.2 In addition, as outlined earlier, in June 2025 NRW issued a Condition Assessment of the Welsh European Marine Sites (WEMS), which indicates that new development has the potential to increase nitrogen discharges within catchments draining to a marine SAC and therefore harm their sensitive ecological features.
- 2.3 The implications of both issues for the RLDP are considered below.

Riverine Special Areas of Conservation

- 2.4 Carmarthenshire is intersected by five riverine SACs. Additional nutrient inputs from human activities such as agriculture and the discharge of treated wastewater can lead to increased nutrients entering the associated rivers. High concentrations of nutrients, including phosphorous, can threaten the long-term health of rivers and have harmful effects on rare and important wildlife in these European sites.
- 2.5 Two nutrient sensitive riverine SACs in Carmarthenshire would be impacted by development proposals which are allocated in the LDP, these are the Afon Tywi and Afon Teifi. To comply with the Conservation of Habitats and Species Regulations (as amended 2017) we, as the competent authority, must be satisfied that new development will not result in adverse effects to the integrity of both SACs.
- 2.6 The Council undertook a Habitats Regulations Assessment (HRA) of the plan and reviewed this as work progressed on the plan and associated nutrient neutrality strategy. The HRA 2nd Addendum Report [CSD14] screened LDP policies and proposals to determine whether any are likely to have a significant effect on riverine SACs. In addition, an HRA was also undertaken of the additional site addendum [ED10e].
- 2.7 The Council have also signed a Statement of Common Ground [CSD62] with neighbouring authorities, NRW and Dŵr Cymru Welsh Water (DCWW) which outlines an agreed approach to facilitate, amongst other things, nutrient neutrality in failing riverine SAC catchments. This approach seeks to manage new development

and associated wastewater discharges to prevent net increases in nutrient loadings. The challenges with achieving nutrient neutrality are compounded by the different source impacts in the SACs. The impacts in the Afon Tywi SAC are largely driven by agricultural inputs, with Wastewater Treatment Works (WwTW) discharges largely driving the source impact in the Afon Teifi SAC.

- 2.8 Whilst there are no known current phosphorous failures in the Afon Tywi SAC and therefore no requirement for nutrient neutrality at present, the Council has taken forward advice to monitor the capacity of WwTW. This is based on the review of WwTW permits by NRW, which in turn dictates the quantity of development permitted [CSD52]. The HRA has confirmed capacity to accommodate limited development within the Afon Tywi SAC. Table 1 lists seven site allocations in the catchment which would deliver an indicative total of 104 dwellings.

Table 1 – Housing Allocations in the Afon Tywi SAC			
Site Reference	Location	Number of dwellings	Wastewater Treatment Works
SuV16/h1	Llwynddewi Road	2	No public sewerage connection required
SuV17/h1	Rear of former joinery, Station Road	35	Nantgaredig (Pontargothi)
SuV51/h1	Opp. Village Hall	8	Cwmifor
SeC16/h1	Llandeilo Northern Quarter	27	Ffairfach
SeC15/h2	Land adjacent to Bryndeilog, Tywi Avenue	8	Llandovery
SeC17/h1	Land opp. Llangadog C.P School	16	Llangadog
SeC17/h2	Land off Heol Pendref	8	Llangadog

- 2.9 Consequently, the seven housing allocations within the catchment would not have an adverse effect on the integrity of the Afon Tywi either alone or in-combination with other plans or projects, since neighbouring authorities do not drain into the Tywi. However, given the limited capacity at the respective WwTW, there is a risk that the permit limits could be breached. Were that to happen, a nutrient neutrality approach would be applied to individual projects.
- 2.10 The Afon Teifi SAC is impacted by high nutrient levels in the water environment, with lower catchment waterbodies generally failing as the river flows through Carmarthenshire, however it is acknowledged that this position should be assessed in relation to most recent waterbody-level results. Table 2 lists 14 housing allocations within the Afon Teifi SAC which would deliver a combined indicative total of 172 dwellings. These allocations have been screened through the HRA. Potential site allocations from neighbouring Ceredigion and Pembrokeshire authorities have also

been considered for their in-combination effects on the wider SAC, although both plans are not as advanced as Carmarthenshire's.

Table 2 – Housing allocations in the Afon Teifi SAC				
Site Reference	Location	Number of dwellings	Wastewater Treatment Works	Proposed Mitigation
SuV37/h3	Land adjacent to Lleinau	10	Lampeter	Enhanced WwTW (Lampeter)
SuV37/h2	Land south of Cae Coedmor	20	Lampeter	
SeC13/h1	Adj. Y Neuadd	10	Llanybydder	Enhanced WwTW (Llanybydder)
SuV33/h1	Land opp. Brogeler	5	Drefach/Felindre	Constructed wetlands (Llandysul) 2.5ha
SuV43/h1	Blossom Inn	5	Llandysul	
SeC14/h1	Blossom Garage	20	Pencader	
SeC14/h2	Land adj. Maescader	24	Pencader	
SuV35/h1	Land adj. Arwynfa	6	Drefach/Felindre	
SuV38/h1	Maes y Bryn	6	Capel Iwan	Constructed wetlands (Adpar) 1.25ha
SeC12/h1	Trem y Ddol	17	Adpar	
SeC12/h3	Land to rear of Dolcoed	20	Adpar	
SuV39/h1	Adj. Yr Hendre	7	Llanfihangel-ar-Arth	Constructed wetlands (Tregaron) 1.88ha
SuV36/h2	Land at Bryndulais	16	No public sewerage connection	
SuV36/h1	Cae Pensarn Helen	6	No public sewerage connection	

2.11 Table 2 lists mitigation measures for each allocation, as recommended in the Nutrient Neutrality Action Plan – Technical Report [CSD57]. Opportunities for on-site

mitigation are limited by the size of each allocation. The Council therefore seeks to deliver strategic scale solutions to demonstrate compliance with the Habitats Regulations and avoid adverse effects from new development. Enhancements to WwTW at Lampeter and Llanybydder would facilitate delivery of around 30 dwellings in Cwmann and 10 dwellings in Llanybydder. The upgrades took effect on 31 December 2025.

- 2.12 Two of the remaining allocations in table 2, they are not served by public sewerage and therefore are outside of the WwTW RoP. Of the remaining 9 allocations in the Teifi catchment, planned WwTW upgrades are not due to be completed until 2030, near the end of the Plan period. The Council is therefore proposing the use of wetlands / strategic mitigation in conjunction with the WwTW permit limits. Three wetlands are proposed at Llandysul, Adpar and Tregaron to address the impacts of the 9 allocations. The Wetlands Calculation Technical Note [CSD57b] provides estimates for nutrient reductions and the associated wetland area requirements. Having regard to NRW’s published policy on constructed wetlands [CSD59], the calculations have been reviewed and refined during the plan preparation.
- 2.13 Several locational factors have led to the selection of the wetland sites including their proximity to WwTW and receiving watercourses to easily receive discharges, their location relative to site allocations, and criteria including topography, soil type, flood risk, ecology and various geological and hydrological considerations. Delivery of the Tregaron wetland is also currently uncertain as connection to the Tregaron WwTW would not currently be accepted by DCWW. Nevertheless, a significant amount of collaborative work has already been undertaken which recognises the complexities of designing, constructing and maintaining wetlands. Whilst full costings have not been provided, including land acquisition costs, estimates for operating and maintaining each wetland have been calculated, which could be shared proportionally between the affected developments.
- 2.14 The Nutrient Neutrality Action Plan outlines the option of delivering mitigation through a development contribution scheme. This would apply to relevant housing developments within the catchment areas, although precise details would be subject to further agreement between stakeholders and the Nutrient Management Boards that have been established to develop and implement management plans for the SACs [CSD61]. Other funding streams could also come forward and therefore allow for costs apportioned to development to be adjusted accordingly.
- 2.15 In addition to the key WwTW enhancements and constructed wetlands, other mitigation measures have been identified across the catchments to deliver wider nutrient reductions. Each option has been assessed at a strategic level and graded on the scope of nutrient removal, costs, scale and feasibility. They include measures such as sustainable drainage systems (SuDS), tree planting and riparian buffer strips. SuDS are already sought from new developments of more than 1 dwelling, thereby offering scope for nutrient reductions. Tree planting, buffer strips and land management cover wide areas of land and whilst specific locations have not been identified, they give scope for landowners and developers to apply measures on a per project basis.
- 2.16 Further work would be required to refine these costs to ensure that developments are not unduly affected. However, for the purposes of this examination, we are satisfied that an evidenced high-level strategy is in place and that development in the

Teifi catchment could still come forward within the remaining Plan period. Whilst the amount of development affected is not significant in the context of the Plan requirement, it is spatially important that housing is delivered in the cluster 4 area in the northern part of the County.

- 2.17 Policy CCH4 provides a basis for securing nutrient neutrality in the Plan. It sets out that development will only be permitted if it can be demonstrated that there is no adverse effect on the integrity of phosphorus sensitive riverine SACs. The policy would, in effect, operate in tandem with the outlined mitigation measures to ensure that the SAC is not adversely affected by new development.
- 2.18 Parts of the policy which were revised through the HRA are procedural in nature since they refer to other legislation in the case of SuDS, or to SPG which does not have the same status as policy. The reference to mitigation measures being agreed between stakeholders is also a procedural matter and is best placed as supporting text to the policy provisions.
- 2.19 **MAC 080** makes several amendments to Policy CCH4. To ensure consistency with national policy, the reference to phosphates is replaced by nutrients in relation to sensitive SACs. These references have been moved to the reasoned justification, which is more appropriate in explaining the policy purpose. A further addition to the reasoned justification is necessary to explain that Drainage Statements should be provided where planning permission is sought prior to submission to the SuDS Approval Body. The associated change in **MAC 045** reflects the latest advice in TAN 15. In addition, to ensure clarity about the application of Policy CCH4, **MAC 009, MAC 016, MAC 017, MAC 021, MAC 030, MAC 051, MAC 056, MAC 059, MAC 060, MAC 061** and **MAC 062**, are necessary to amend Policies RTC2, HOM4, HOM5, HOM9, EME5, PSD6, PSD10, RD1, RD2, RD3 and RD4.
- 2.20 These MACs are necessary to avoid harming the integrity of riverine SACs. When read alongside the Action Plan, we are satisfied they provide an effective basis upon which to manage development impacts in the catchment areas.

Marine Special Areas of Conservation

- 2.21 The coastline of Carmarthenshire is subject to a number of ecological designations including the Pembrokeshire Marine and Carmarthen Bay and Estuaries SACs, several sites of special scientific interest (SSSIs) and national / local nature reserves (N/LNRs). The findings of the condition assessment published by NRW in June 2025 show that the nutrient sensitive features of these SACs are in unfavourable condition for dissolved inorganic nitrogen and biological indicators (phytoplankton and opportunistic macroalgae) related to nutrient enrichment. Two waterbodies, Milford Haven Inner and Burry Inlet Inner, located within the SACs were found to have features which are in unfavourable condition due to chemical and biological failure.
- 2.22 As a result, there are clear and significant implications for the integrity of the affected SACs if the quantum of development required in the RLDP is to be delivered during the Plan period. To address this concern, NRW has advised Local Planning Authorities that a conclusion of no adverse effects on site integrity can be drawn in an HRA, where any plans or projects in affected areas with the potential to increase nutrient discharge can secure appropriate mitigation and demonstrate nutrient neutrality for nitrogen (NN).

- 2.23 At our request the Council has produced a note on the Implications of Updated Marine Conservation Advice for the RLDP. The note outlines the nature of the issue and the need for NN in Carmarthenshire. In doing so the note makes clear that the evolving nature of the issue means that it was not, at the time of writing, possible to be precise about its exact nature, the extent of the affected area, or the required mitigation measures [ED13a, b and c).
- 2.24 In January 2026, the WG issued a statement which clarifies how soundness test 3 in the DPM should be applied in relation to the examination of the RLDP [ED17]. The Statement recognises that because of the advanced stage of the RLDP examination it is in a unique position; that matters in relation to the impact on the marine SAC are still evolving; and that not all of the potential mitigation measures, costs and implications regarding nitrates are able to be quantified at this time.
- 2.25 The WG's statement makes clear that to meet soundness test 3, the Council will need to demonstrate, through the examination process, that the Plan can address issues relating to the management of excess nutrients, site viability and the deliverability of committed and allocated sites. To do this the statement requires that a review is undertaken of factors considered fundamental to ensuring the Plan can be implemented in a way that ensures nutrient neutrality in the affected marine SAC. These factors and our assessment of the relevant available evidence are set out below.

a) Definition of the geographical area in which NN is required.

- 2.26 The Council's note provisionally indicated that the geographical area where NN is required covers a large area of land in the South of the County and includes four estuaries, the River Loughor that flows into the Burry Inlet and the rivers Taf, Tywi and the Gwendraeth which empty into Carmarthen Bay. The Pembrokeshire Marine SAC covers a much smaller geographical area in the north of the County.

b) Phasing and delivery of growth within the NN area

- 2.27 Whilst no site allocations or commitments are in the Pembrokeshire Marine SAC area, the Carmarthen Bay and Estuaries NN includes 27 allocated and 25 committed housing sites, and 2 allocated Gypsy and Traveller sites.
- 2.28 The Llanelli Coastal WwTW, along with Gowerton, has nitrogen stripping technology installed. Initial indications suggest that the Llanelli works is operating at an efficiency of approximately 80% for total nitrogen removal, representing the optimal achievable technical performance for this process.
- 2.29 The Llanelli Coastal WwTW is located within the NN area, and although the treatment works discharges outside the defined area, the complex nature of hydrological connections and the drainage pathway means that development which drains into this works will be required to achieve nutrient neutrality.

Table 3 – Housing Allocations			
Site Reference	Location	Number of dwellings	Wastewater Treatment Works
PrC2/h1	Beech Grove, Pwll, Llanelli	10	Llanelli Coastal
PrC2/h10	Land adjacent The Dell, Furnace	13	Llanelli Coastal
PrC2/h20	Harddfan, Bryn	6	Llanelli Coastal
PrC2/h23	Dafen East Gateway	150	Llanelli Coastal
PrC2/SS1	Pentre Awel	240	Llanelli Coastal
PrC2/(iii)	Land at Pendderi Road, Bryn	35	Llanelli Coastal
PrC2/(v)	Land off Heol y Mynydd, Bryn	80	Llanelli Coastal
*SeC6/h2	Land between Clayton Road and East of Bronallt Road, Hendy	20	Llannant
SeC6/(ii)	Fforest Garage, Hendy	8	Llannant
SeC6/(iii)	Land at Fforest Road, Hendy	35	Llannant
SeC7/h3	Golwg Yr Afon, Llangennech	50	Llangennech
SeC7/h4	Opposite Parc Morlais, Llangennech	32	Llangennech
SeC7/h5	Maesydderwen, Llangennech	5	Llangennech
SeC7/(i)	Land off Pontarddulais Road Llangennech 60	60	Llangennech
PrC3/h1	Land at rear of 16-20 & 24-30 Betws Road, Betws	9	Garnswllt
PrC3/h6	Land adjoining Maes Ifan, Maesquarre Road, Betws	18	Garnswllt
PrC3/h20	Land North of Maespiode, Llandybie	45	Garnswllt
PrC3/h26	Land off Parc-y-Mynydd, Saron	15	Garnswllt
PrC3/h27	Land off Nant-y-Ci Road, Saron	18	Garnswllt
*PrC3/MU1	Emlyn Brickworks, Penygroes	107	Garnswllt
PrC3/(i)	Emlyn Brickworks, Penygroes	50	Garnswllt

PrC3/(ii)	PrC3/(ii) Adjacent to Pant-y-Blodau	11	Garnswllt
PrC3/(iv)	Land adjoining Maes Ifan, Maesquarre Road, Betws	6	Garnswllt
PrC3/(v)	Land off Parklands Road, Penybanc	9	Garnswllt
PrC3/(viii)	Land rear of 108-114 Waterloo Road, Penygroes	6	Garnswllt
SeC9/h2	Heol Gelynen, Brynamman	8	Garnswllt
SuV27/h1	Land adjacent to Ty Newydd Carmel	5	Carmel and Pantllyn

*In part duplicates committed site

Table 4 – Gypsy and Traveller Site Allocations

Site Reference	Location	Number of Pitches	Wastewater Treatment Works
PrC2/GT1	Land at Penyfan, Trostre	7	Llanelli Coastal
PrC2/GT2	Penybryn (extension), Bynea	6	Llanelli Coastal

Table 5 – Committed Housing Sites

Site Reference	Location	Number of dwellings	Conditions discharged
PrC2/h4	North Dock Llanelli	210	No
PrC2/h15	Maesarddafen / Ews Las, Llwynhendy	94	Yes
PrC2/h16	Ynys Las, Cefncaeau	33	No
PrC2/h22	Cwm y Nant, Llanelli	202	No
PrC2/h24	Clos Ffordd Fach, Llanelli	13	Yes

PrC2/h26	Land adjacent to 19 Llwynhendy Road, Llanelli	6	Partly
PrC2/h27	42 Stepney Street, Llanelli	8	Yes
PrC2/h28	Heol y Graig, Llwynhendy	5	Partly
PrC2/(ii)	Land at Cefncaeau, Llanelli	91	No
SeC4/h2	Burry Port Harbourside	364	No
SeC6/h2	Land between Clayton Road and East of Bronallt Road, Hendy	6	Yes
SeC6/h3	Coed Y Bronallt, Hendy	6	Partly
SeC6/(i)	Land off Heol y Parc, Hendy	7	No
SeC7/h1	Box Farm, Llangennech	7	No
PrC3/h4	Tirychen Farm, Ammanford	150	No
PrC3/h9	Land adjacent to Maesyrfhaf, Cross Hands	5	Partly
PrC3/MU1	Emlyn Brickworks, Penygroes	70	No
PrC/h22	Adjacent Pant Y Blodau, Penygroes	79	Yes
PrC3/h36	Betws Colliery, Betws	66	Yes
PrC3/(iii)	Land rear of 10-12 Norton Road, Penygroes	6	Yes
PrC3/(vi)	Land Opposite Plough and Harrow, Betws	9	Yes
PrC3/(vii)	Land off Dôl y Dderwen, Myddynfych	31	Yes
SuV25/h1	Land North of Clos Rebecca, Llannon	47	Yes
SuV25/(i)	Cysgod yr Eglwys (Adjacent St. Nons Church), Llannon	34	Yes
SuV26/h1	Rear of Garreg Lwyd, Llanedi	11	No

2.30 Tables 3 and 4 illustrate that, of the 1,051 dwellings and 13 Gypsy and Traveller pitches allocated in the NN areas during the Plan period, 534 dwellings and 13 pitches into the Llanelli Coastal WWTW. When adjusted to take account of duplicate committed sites, the overall figure is likely to reduce to 967 dwellings.

- 2.31 Table 5 shows that of the 25 sites that have planning permission, conditions have been fully discharged on 11 sites. The remaining 14 sites will provide land for the construction of 1,167 dwellings.
- 2.32 The remaining allocated and committed housing sites account for approximately 25% of the RLDP's HR, whilst allocated Gypsy and Traveller sites are intended to meet the outstanding need for pitches in the County within the Plan period. The housing and Gypsy and Traveller sites are key elements of the RLDP's spatial strategy and essential to delivery of its growth requirements.

c) Impact and mitigation measures

- 2.33 To quantify the potential scale of the impact on the Burry Inlet, the Council has prepared a plan level nitrogen budget for the RLDP. This includes a total nitrogen estimate for each allocation. The outputs provide an interim indication of nitrogen loading from development and establish a consistent basis for assessing the impact of the RLDP. The calculator has been adjusted to take account of nitrogen concentrations and performance parameters specific to the Llanelli Coastal WWTW.
- 2.34 The assessment establishes the Plan level nitrogen inputs that must be considered through the HRA process. It also provides the quantitative basis for determining the mitigation required to ensure that implementation of the Plan would not have an adverse effect on site integrity. The note explains that by applying the agreed calculation method, the budget provides a consistent and defensible assessment of anticipated nitrogen loading from development within the affected catchment. This evidence underpins both the mitigation and policy provisions proposed and also supports meeting the duties under the HRA Regulations [ED13c, Section 6].
- 2.35 To ensure the effective management of the NN area the Council intend to prepare:
- Developer Led Guidance / Toolkit – which would provide step-by-step advice on calculation methods, trigger criteria, and when mitigation is required. It will outline a range of known and potential mitigation measures for bringing forward sites within the affected area, including SuDS with denitrification, water efficiency, surface water removal and tertiary wetlands. At the time of writing this has been published and will in due course be adopted as SPG; and
 - Strategic Guidance and Action Plan – setting out a longer-term understanding of the need for, and funding of, strategic mitigation measures such as wetland creation, surface water separation schemes and water efficiency programmes. Measures will be prioritised based on nutrient load reduction capacity, technical feasibility, and cost-effectiveness. The Action Plan will develop a phased delivery plan for priority mitigation schemes. A key element of the guidance will be the development of nutrient credit trading, an approach which is intended to support the future delivery of development as well as opportunities for nature capital and ecosystems benefits.

d) Financial Viability Assessment

- 2.36 As outlined in Section 7 of this report, the requirement for mitigation measures in relation to the delivery of new housing development has been considered as part of the Financial Viability Report (2022) (FVR) [CSD31] and the Addendum / Update of the FVR (2024) (FVR Update) [CSD32]. The reports include, amongst other things,

an allowance of between £3,500 – 4,000 per dwelling for SuDs and a contingency sum of 5% to address unexpected variations in construction costs. The provisions made in the FVR are sufficient to ensure that adequate headroom exists for appropriate mitigation measures to be implemented in respect of the affected sites and for the sites to be delivered in the manner envisaged in the RLDP.

e) Changes to the policy and monitoring framework

- 2.37 The Council proposes several changes to the RLDP to strengthen the policy framework for managing the impacts of new development within the NN area. These changes include revisions to Policies CCH4, INF4, the housing trajectory and the monitoring framework.
- 2.38 In addition to the revisions to Policy CCH4 outlined earlier, **MAC 036** amends Policy INF4 by removing reference to local and national policy requirements. It also deletes the detailed explanation in the reasoned justification of the requirement for relevant developments to remove surface water from the sewerage system. Further changes to Policy INF4, suggested in response to the MACs consultation in relation to the Water Framework Directive and the quantity of surface water to be removed are matters which, in our view, can be addressed as minor editorial or factual changes. **MAC 122** amends the Plan's housing trajectory to ensure it reflects the lead in times necessary for affected sites to be delivered in accordance with NN requirements. **MAC 112** amends the monitoring framework to include new indicators which require the publication of the Developer Led Guidance / Toolkit and Strategic Guidance and Action Plan within 6 months of the adoption of the RLDP.

f) Habitat Regulations Assessment

- 2.39 The changes to the monitoring framework together with other revisions to the Plan arising from the examination were assessed in the third addendum to the HRA [ED19c] and subject to a Stage 2: Appropriate Assessment (AA). The AA concluded that subject to **MAC 057**, which introduces a policy on the density of new housing development, and the changes proposed to Policies CCH4, INF4, the trajectory, and the monitoring framework, which seek to mitigate the impact of development on the marine SAC, the RLDP would have no adverse effect on the integrity of any site within the National Site Network [ED19c, section 4].
- 2.40 Although the WG statement does not disapply soundness test 3, it does recognise that, given the exceptional circumstances, a pragmatic approach should be taken to the examination of the Plan. Based on our assessment of the submitted evidence and a recognition that further work will be required, we are satisfied that the policy framework provided by the Plan will be sufficient to ensure that future growth within the affected area will be delivered in an appropriate and timely manner. This approach is consistent with the spatial strategy and provides the necessary safeguards to protect the integrity of National Site Network.

Conclusions

- 2.41 Overall, we are satisfied that based on the submitted evidence and subject to the MACs, the RLDP would not have an adverse likely significant effect (LSE) on either the riverine or marine SACs within the Plan area.

3 Preparation requirements

- 3.1 The legal and regulatory requirements for Plan preparation are set out in the 2004 Act and the LDP Regulations 2005. Further guidance is contained in PPW and the DPM.

Delivery agreement

- 3.2 The Delivery Agreement sets out the approach to community involvement, the timetable for plan preparation and confirms the plan period for the RLDP runs from **1 April 2018 until 31 March 2033** [paragraph 1.1.4, CSD9]. The RLDP has been prepared in accordance with the Delivery Agreement and Community Involvement Scheme [CSD9], as revised by agreement with the WG, and the Community Involvement Scheme as referenced in the Consultation Report [CSD208].
- 3.3 All proposed changes to the Plan have been advertised and consulted on. As such we are content that the approach taken to community involvement in the plan making process complies with the requirements of the Delivery Agreement and the LDP Regulations.

Integrated Sustainability Appraisal

- 3.4 The Plan has been the subject of an Integrated Sustainability Appraisal (ISA) which includes SA and Strategic Environmental Assessment (SEA), alongside a Welsh Language Impact Assessment (WLIA), an Equality Impact Assessment (EqIA), elements of a Health Impact Assessment, Local and National Well-being Goals, and other considerations related to the environment including NRW's Area Statement and the Section 6 Duty [CSD 15 - 20]. Further changes put forward by the Council as part of the examination process have likewise been tested, where necessary, for any impacts they have upon the ISA [ED19b].
- 3.5 Overall, we are satisfied that the ISA process undertaken, including the consideration of reasonable alternatives, is robust, meets procedural and legal requirements and is consistent with the requirements of PPW.

Habitat Regulations Assessment

- 3.6 The RLDP has been subject to HRA as required by the Conservation of Habitats and Species Regulations 2017. This includes an HRA Report which assessed the Plan as a whole and three addendums which addressed changes to the Plan.
- 3.7 The HRA Report [CSD12] outlines the findings of the Stage1: Screening Exercise undertaken in respect of the emerging RLDP and concluded that there was potential for the Plan to have likely significant effects on 11 of the identified National Site Network Sites within and adjoining the County. These are:
- Carmarthen Bay and Estuaries European Marine Site SAC
 - Elenydd-Mallaen Special Protection Area SPA Bird Assemblages
 - Burry Inlet SPA Bird Assemblages
 - Caeau Mynydd Mawr SAC

- Cernydd Carmel SAC
- River Tywi SAC
- River Teifi SAC,
- River Wye SAC
- River Cleddau SAC
- Cardigan Bay SAC.
- Pembrokeshire Bat Sites & Bosherton Lakes SAC

- 3.8 Consequently, the screening reports recommended that the HRA continue and a Stage 2: AA be undertaken in respect of the emerging Plan. The AA concluded that, subject to the implementation of appropriate mitigation measures, the Plan will have no LSE, either alone or in combination, on any European sites [CSD12, section 5].
- 3.9 The first HRA addendum report [CSD13] assessed evidential changes in national and local policy and guidance primarily in relation to riverine SACs, whilst the second addendum [CSD14] addressed the integrity of riverine SACs. The assessments were subject to Stage 2: AA, which found that subject to the revision of Policy CCH4 and the implementation of appropriate mitigation measures, the RLDP would not have an adverse effect on the integrity of any National Site Network Site [CSD 13, section 4 and CSD14, section 5].
- 3.10 The third HRA addendum assessed the LSE of proposed MACs to the Plan, which includes measures intended to address impacts on marine SACs. As with the earlier HRAs, the assessment was subject to an AA. The AA concluded that, subject to **MAC 057** and the implementation of identified mitigation measures, the RLDP will not have an adverse effect on the integrity of any National Site Network Site [ED19c, Section 4].
- 3.11 Accordingly, on the basis of the submitted evidence we are satisfied that the findings of the HRA as amended clearly show that, subject to appropriate mitigation, no significant effects upon the integrity of the National Site Network Sites within the Plan area or in adjacent areas are likely to occur either alone or in combination with other plans or projects as a result of implementing the RLDP.

Public sector equality duty

- 3.10 The public sector equality duty requires public authorities to have due regard to the need to eliminate discrimination, promote equality of opportunity and foster good relations between different communities. As part of the ISA, the Council has undertaken and publicised an EqIA of the Deposit Draft RLDP [CSD18] to ensure that such issues have been considered throughout the Plan preparation process.
- 3.11 We are satisfied that this evidence demonstrates that the RLDP, as amended, would promote equality and diversity and would not adversely affect or discriminate against any people who are protected under the Equality Act 2010.

Well-Being of future generations

- 3.12 The Well-Being of Future Generations (Wales) Act 2015 (WBFG Act) sets out a duty on public bodies to improve the economic, social, environmental and cultural well-being of Wales, in accordance with sustainable development principles.
- 3.13 The Council has undertaken a compatibility assessment of the RLDP's Issues, Vision and Strategic Objectives [CSD68]. against the requirements of the Carmarthenshire Well-being Plan The assessment explains the implications of the Well-being Plan for the RLDP and how it addresses these requirements. The findings of the assessment make clear that, overall, the requirements of the Well-being Plan have been embedded into the RLDP. In addition, the ISA considered the compatibility of the Plan with the requirements of the WBFG Act, the Carmarthenshire Public Service Board Well-being Plan and the Carmarthenshire Well-being Plan [CSD16, LPG1 and LPG2]. The findings of this assessment indicate that the RLDP has the potential to support improvements in the economic, social, environmental, and cultural well-being of the County.
- 3.14 In light of the evidence presented, we are satisfied that it aligns with and supports the overarching principle of the WBFG Act, the Carmarthenshire Public Service Board Well-being Plan and the Carmarthenshire Well-being Plan and, as such, will contribute towards improving the economic, social, environmental and cultural well-being of Wales.

Conclusion

- 3.15 Accordingly, the legal and regulatory preparation requirements have been satisfied.

4. Strategic framework

Vision and objectives

- 4.1 The County of Carmarthenshire lies in a central position in South West Wales. It has a land area of some 237,000 hectares and is bordered by Ceredigion, Pembrokeshire, Swansea, Powys, Neath Port Talbot, Bannau Brycheiniog and Pembrokeshire Coast National Parks. The County has three major towns, Carmarthen, Llanelli and Ammanford, which act as focal points for much of the socio-economic activity, and a mixture of medium and smaller settlements which meet more localised needs. Carmarthenshire also benefits from a rich and diverse cultural, built, historic and natural environment which includes spectacular upland, estuarine and coastal landscapes.
- 4.2 Economically, Carmarthenshire forms part of the Swansea Bay City Deal, which in partnership with other private and public sector bodies seeks to promote growth. In addition, a number of settlements in the County, including Llanelli, Carmarthen and Newcastle Emlyn, are identified in Policies 1, 28 and 29 of Future Wales (FW) as being national and regional growth areas.
- 4.3 The RLDP, subject to **MAC 001** and **MAC 002** which correctly explains its relationship with the requirements of FW and the emerging Strategic Development

Plan for South West Wales, provides a clear and succinct description of the main social, economic and environmental characteristics of the County and the national, regional and local policy framework that will influence development over the Plan period.

- 4.4 A series of key issues which need to be addressed in the Plan have been identified in Chapter 5 of the RLDP. The issues are grouped under the national well-being goals and outlined in the Issues, Vision and Strategic Objectives Topic Paper [CSD68, section 11].
- 4.5 The RLDP Vision has been informed by the key issues and integrates the Plan with the requirements of the Council's Corporate Strategy "Moving Forward in Carmarthenshire - the next 5 years – 2018-2023" [LPG3], Carmarthenshire Well-being Plan [LPG1], national well-being goals, the Swansea Bay City Region and FW [CSD68, section 12]. To achieve the Vision, the RLDP has four overarching strategic objectives which seek to:
- create healthy habits - where people have a good quality of life and make healthy choices about their lives and environment.
 - provide early intervention - to make sure that people have the right help at the right time.
 - make strong connections – to connect people, places and organisations that are able to adapt to change, and
 - deliver prosperous places – to maximise opportunities for people and places in both urban and rural parts of the county.
- 4.6 The overarching objectives are underpinned by 14 Strategic Objectives (SO) which, subject to **MAC 003** which amends SO4 to include housing, have been devised to address the identified social, cultural, environmental, and economic well-being issues [CSD68, section 13].
- 4.7 We are satisfied that the Vision and the overarching objectives and SOs respond to the key issues, are locally distinct, ambitious and consistent with national policy and set an appropriate framework for the Plan strategy, policies and allocations.

The Plan's strategy

- 4.8 The overarching strategy for the RLDP comprises two distinct elements: a spatial strategy which recognises the diversity that exists within the County and seeks to distribute new development in a sustainable manner, and a growth strategy which seeks to balance future housing, employment and infrastructure needs over the Plan period. The strategy is accompanied by a Key Diagram which identifies the clusters, towns and villages within the settlement hierarchy, strategic sites, the transportation network and linkages with the wider region.

Spatial strategy

- 4.9 Six strategic options were developed for the RLDP. These were based on a range of factors including the results of community engagement, social, economic, environmental and geographical evidence and policy and regeneration-based objectives. The options considered were the:

- **Adopted LDP Strategy Option** - which utilises the adopted Plan's settlement hierarchy to allow for a proportional distribution of development based on sustainability principles.
- **Infrastructure and Transport Network Option** - which bases most of the growth near to main highways and the rail network and in locations where there is infrastructure available to support development.
- **Dispersal Option** – which provides no rationale or structure for the distribution of growth relying instead on development being dispersed across the County.
- **Community Led Option** – which would disperse development within community areas in a manner which reflects the role settlements play within those areas and the wider localities.
- **Swansea Bay City Region Influence Option** – which focusses and aligns growth to the areas identified for Swansea Bay City Deal projects, and
- **Market Led Option** – which focusses growth in the areas proved to be most popular with the housing market over recent years.

- 4.10 The background to, and detailed analysis of the identified options is provided in the Spatial Options Topic Paper [CSD69] and further tested through the ISA process [CSD18, Appendix E]. The analysis clearly demonstrates that a hybrid option, the Balanced Community and Sustainable Growth Strategy, was the most appropriate strategy option. This option refines the approach taken in the Community Led option and seeks to provide sustainable growth and regeneration to meet the community's needs. In doing so, it aligns with the vision and objectives and recognises the contrasting character of Carmarthenshire in seeking to provide appropriate development in both urban and rural areas [CSD69, Section 10].
- 4.11 To provide spatial expression for these requirements and distribute the growth in a way which reflects the diversity of the Carmarthenshire, the strategy subdivides the County into the following six clusters:
1. Carmarthen and its Rural Areas
 2. Llanelli and the Southern Gwendraeth Area
 3. Amman and Upper Gwendraeth
 4. Teifi
 5. Upper Tywi, and
 6. Western Carmarthenshire
- 4.12 The geographical extent of each cluster has been defined having regard to the role and function of settlements. This means that each cluster contains a principle and/or service centre, supporting or supported by a network of smaller settlements [CSD72, Section 4].
- 4.13 Policy SP3 provides the framework for the sustainable distribution of growth and development in Carmarthenshire. A key component of the framework is the definition of a four-tiered settlement hierarchy for the County. The Role and Functions Topic Paper [CSD72, section 4] explains that the hierarchy in the RLDP, which comprises principal centres, service centres, sustainable villages and rural villages, was defined following consideration of the main socio-economic characteristics of each of the settlements within the Plan area. In doing so, the assessment process recognised: the need for the distribution of growth across the

County to accord with sustainable principles; the diverse character of the settlements in Carmarthenshire; and the relationship between settlements, both within and outside the County, that influences opportunities for growth. The approach avoids any assumption that every settlement must contribute towards growth, rather it considers the settlements on their merits whilst having regard to their sustainability and position within the hierarchy.

- 4.14 Carmarthen, Llanelli and Ammanford / Cross Hands have the highest population bases and are served by an extensive range of services, facilities and sustainable transportation routes. In addition, Llanelli and Ammanford / Cross Hands are identified as part of the Swansea Bay and Llanelli National Growth Area, whilst Carmarthen is identified as a Regional Growth Area. Consequently, they have been identified as the Plan’s principal centres. Given their local, regional and national roles, as reflected in FW, it is justified that around 45% of the Plan’s allocated housing and 89% of the allocated employment growth will be directed to those settlements over the Plan period [CSD 72, section 4].

- 4.15 The Service Centres include Pontyates / Meinciau, Ponthenri, Ferryside, Kidwelly, Burry Port, Pembrey, Hendy / Fforest, Llangennech, Trimsaran/ Carway, Brynamman, Glanamman / Garnant, Pontyberem / Bancffosfelen, Newcastle Emlyn, Llanybydder, Pencader, Llandovery, Llandeilo / Rhosmaen / Ffairfach, Llangadog, St Clears/ Pwll Trap, Whitland and Laugharne. In combination these settlements would accommodate 657 new dwellings on allocated sites and will provide approximately 6.5 hectares of land for new employment related development over the Plan period. Although more limited in terms of size and facilities than the primary centres, the service centres offer a good range of facilities for their own and surrounding communities. It is therefore appropriate that these settlements have been identified as capable of accommodating further growth [CSD 72, section 4].

- 4.16 Sixty-four settlements have been identified as Sustainable Villages. These settlements are generally reasonably located on/or near sustainable transport corridors and have facilities and services which are community focused, including basic healthcare and local shopping provision. Proposed new housing development is small scale and will be accommodated through the delivery of allocations and windfall sites over the Plan period [CSD 72, section 4].

- 4.17 Rural Villages includes seventy-six settlements which have a limited number of facilities and services. These villages do not have defined limits and no allocations are made. Instead, small scale development will be supported on windfall sites over the Plan period [CSD 72, section 4].

Settlement boundaries

- 4.18 To ensure the effective management of built areas the RLDP, through Policy SD1 identifies development limits for principal centres, service centres and sustainable villages. The limits are intended to allow those settlements to grow in a sustainable and controlled manner and to manage development in the countryside. To provide clarity about the approach to be taken to development in Tier 4 settlements, **MAC 010** amends Policy SD1 and its reasoned justification, makes clear that in rural villages and outside defined development limits there will be a presumption against inappropriate development. This approach is consistent with national policy.

- 4.19 The development limits were based on those designated in the Adopted LDP (ALDP) and refined following a detailed review process. The Development Limits Topic Paper [CSD73, section 7], explains that the review sought to ensure that the defined limits:
- Accord with the requirements of the emerging RLDP;
 - Are drawn in a consistent and logical manner which offer clarity and robustness in decision making;
 - Include any recently constructed developments, sites with an extant planning permission, land allocated in the RLDP for development and, where appropriate, any site which are considered worthy of protection e.g. Public Open Space; and
 - Allow for the development potential of a settlement to be realised in a manner consistent with its character and having regard to any environmental or other considerations.
- 4.20 The findings of the review process have not been published, but the Council has confirmed that the review of the development limits incorporated extensions to provide opportunities for development as well as deleting/omitting land no longer considered appropriate. It also enabled a 'tidying up' of the limits, ensuring where possible that they were clipped to an established boundary, providing sufficient scope for development to occur and reflecting the curtilage of any recently consented development [AP1/8a]. We conclude that the settlement boundaries are justified based on application of consistent methodology.
- 4.21 Overall, we are content that the Spatial Strategy, including the distribution of development and drawing of development limits, is based on robust and credible evidence, will provide a positive framework for the delivery and distribution of sustainable development and regeneration activities in the Plan area and is consistent with the requirements of FW and national policy.

Growth strategy

- 4.22 The Plan's growth strategy seeks to balance the need for future housing, both private market and affordable, with the provision of employment and accompanying infrastructure, including improvements to transport networks, utilities, green infrastructure, health, education and social facilities.
- 4.23 To determine the appropriate level of growth for the Plan period, the Housing and Economic Growth Report [CSD34] identified and tested a number of different growth scenarios. The scenarios were formulated having regard to demographic and population data, derived from 2018-based subnational population projections, 2020 mid-year estimates, the 2021 census and past trends. The scenarios have been adjusted to take account of a 3.8% vacancy rate [CSD34].
- 4.24 The seven scenarios are:
- **Principal 2018-based WG Projections** –replicating the WG 2018-based principal population projection, using historical population evidence for 2001–2018.

- **WG High 2018-based variant** –replicating the WG 2018-based high population projection, using historical population evidence for 2001–2018 and incorporates high fertility, life expectancy and migration assumptions.
- **WG Low 2018-based variant** –replicating the WG 2018-based low population projection, using historical population evidence for 2001–2018 and incorporates low fertility, life expectancy and migration assumptions.
- **Ten-year trend-based projection** – using an Office of National Statistics 2020 mid-year estimates base year and calibrates its migration assumptions from a 10-year historical period (2010 - 2020).
- **Fifteen-year trend-based projection** – using an Office of National Statistics 2020 mid-year estimates base year and calibrates its migration assumptions from a 15-year historical period (2005–2020).
- **Rebased principal projection** – rebasing the principal projection by effectively moving its five-year trend forward to 2020, and
- **Baseline employment-led scenario** – using the population impact of an average annual employment growth of +316 jobs per year between 2020 and 2036.

- 4.25 The findings of the Report outlined the number of new homes required and jobs that would be created in each scenario over the Plan period. These figures ranged from 4,359 new homes and 3,015 jobs created in the WG Low 2018-based variant scenario to 10,461 new dwellings and 6,015 jobs created in the Rebased principal projection. The Council decided that the ten-year trend-based scenario, which would deliver 8,822 new homes and 4,140 new jobs was the most appropriate option and would assist in the delivery of regional and countywide socio-economic objectives. [CSD70, section 4 and 5]. Although the preferred scenario exceeds the WG projections, based on the submitted evidence, we are content that scenario represents a robust and proportionate approach to the delivery of housing and economic growth that would assist in achieving the Plan's vision for prosperous, cohesive and sustainable communities and meeting the key national priorities set out in FW.
- 4.26 To achieve this level of growth, the submitted RLDP, through Policies SP1, SP4, SP5 and SP7, proposes to make provision for: 9,704 new homes to meet the identified HR of 8,822; 1,900 affordable homes; and a minimum of 71.21ha of employment land intended to accommodate 4,140 additional jobs. In doing so, it is anticipated that the growth strategy will lead to the creation of a balanced and cohesive County which would provide a strong and economic driver for growth locally, regionally and nationally and place Carmarthenshire at the centre of a prosperous and sustainable Wales.
- 4.27 In support of the Growth Strategy, the RLDP allocates a series of regeneration and mixed use, reserve and strategic sites. Policy SG1 allocates 10 regeneration sites for a mixture of uses including housing, employment, education, tourism and retail development. To provide clarity on the intended mixture of uses on these sites **MAC 005 and MAC 125**, explains the nature and scale of development proposed for each site.

- 4.28 A number of reserve sites are identified under Policy SG2, which are intended to be released for development if the sites allocated under Policies HOM1, EME1 and SG1 fail to deliver as anticipated during the Plan period. The approach outlined in Policy SG2 is contrary to the requirements of national guidance which makes clear that, in order to effectively address issues in relation to the non-delivery of sites, a flexibility allowance should be embedded into the plan [DPM, paragraph 5.59]. As a consequence, **MAC 006**, deletes Policy SG2.
- 4.29 Subject to MACs, we are satisfied that the level of growth identified in the RLDP is based on robust evidence and is consistent with the requirements of FW and national guidance.
- 4.30 Further consideration will be given to the scale and delivery of housing and employment growth in subsequent chapters of this report.

Strategic policies

- 4.31 In addition to the aforementioned policies, the RLDP sets out a number of strategic policies which deal with a range of topics including strategic sites allocations, retail and town centres, housing, affordable homes, employment and the economy, Welsh language and culture, Gypsy and Traveller provision, infrastructure, placemaking and sustainable design, rural development, natural, built and historic environment, climate change, transport and accessibility, mineral and waste management. These policies provide a clear and detailed framework for the management and delivery of development in the County over the Plan period.
- 4.32 An assessment of each strategic policy is provided under the relevant sections of this report.

Retail and town centres

- 4.33 The Carmarthenshire Retail Study Update (2023) [CSD 99] reviews the county retail hierarchy and provides a quantitative and qualitative assessment of the provision of convenience and comparison goods in the Plan area. The Study recommends a three-tier retail hierarchy, with Carmarthen being designated as a High Order Town Centre, Llanelli and Ammanford as Mid Order Town Centres and Burry Port, Llandeilo, Llandovery, Newcastle Emlyn, St. Clears and Whitland as Lower Order Town Centres. The boundaries for the designated town centres including primary and secondary shopping areas are delineated on the proposals map and are supported by evidence in the Town Centre Retail Audit (2024) which illustrates the extent of retail activity in each of the centres [CSD100].
- 4.33 The Study concludes that there is no capacity for additional convenience or comparison goods retail floorspace in Carmarthenshire for the foreseeable future. Rather it is suggested that any future need for retail development could be accommodated through the reuse or redevelopment of vacant retail floorspace within the designated town centres or, as is the case with allocation PrC2/MU2 - Trostre Gateway, Llanelli, the development of a site with an extant planning permission [CSD100, section 7].
- 4.34 The approach taken in the Carmarthenshire Retail Study Update is consistent with the methodology promoted at national level and therefore provides a robust basis on which to identify and manage future retail need and development requirements.

- 4.35 The framework for the management of retail and town centres in the County is provided by Policies SP2, RTC1 and RTC2. Policy SP2 outlines the retail hierarchy for Carmarthenshire and seeks to ensure that the development of new retail and appropriate town centre uses maintains and enhances the vitality, viability and attractiveness of the centres. **MAC 007** amends Policy SP2 through: the deletion of criteria (c) and (i) – (iv) which repeat national policy; revisions to criterion (d) to provide certainty about the application of the policy; and amendments to the reasoned justification to explain the capacity for additional retail floorspace in the County and the approach to assessing proposals for new non-retail uses in the town centres.
- 4.36 Proposals for new development which would result in the loss of a local shop, service or community facility outside of the settlements identified in the retail hierarchy will be assessed in accordance with Policy RTC1. **MAC 008** will clarify the application of the policy and the scope of the marketing exercise in relation to local shop, service or community facilities.
- 4.37 In our view, the definition of the retail and commercial centre hierarchy, primary and secondary shopping areas and identification of retail needs for the Plan area are based on robust and credible evidence and are consistent with the requirements of national policy and advice.

Welsh language

- 4.38 Evidence in relation to the Welsh language is contained in the ISA [CSD15], the Welsh Language Impact Assessment (2022) [CSD24], the Welsh Language Evidence Update (2024) [CSD25] and the Revised Welsh Language Topic Paper [CSD80].
- 4.40 The Revised Welsh Language Topic Paper explains that the 2021 census data shows Carmarthenshire has the second highest number of Welsh speakers in Wales with 72,838 people speaking the language. Between 1991 and 2021 the percentage of Welsh speakers in Carmarthenshire declined by 15% from 54.9% to 39.9%. Although there is no obvious concentration of Welsh speakers in any particular area, the electoral wards with the highest proportion of Welsh speakers are located in the Amman and Gwendraeth Valleys.
- 4.41 In this context, one of the Plan issues is to measure the impact of development on the Welsh language. The RLDP identifies Strategic Objective 11 which seeks to assist in protecting, enhancing and promoting the language. The Council has identified the whole county as linguistically sensitive, and to which the provisions of Policy WL1 therefore apply.
- 4.42 The growth options and site allocations have been assessed for Welsh language impacts. The Impact Assessment concludes the Plan has a realistic possibility of encouraging and realising overall growth in Welsh speaker numbers. This is predicated on a growth option which assumes inward migration particularly in older age groups, which has the potential to dilute Welsh language and culture in certain areas. However, Welsh language immersion, driven by its use through education in younger ages, could improve rates in the longer term and potentially mitigate impacts created by inward migration.

- 4.43 The policy framework for the Welsh language is provided by Policies SP8 and WL1. Policy SP8, subject to **MAC 031** which clarifies the requirements of the policy and updates the reasoned justification to reflect the findings of the 2021 census, outlines the strategic context for safeguarding, promoting and enhancing the Welsh Language.
- 4.44 Policy WL1 provides the mechanism for ensuring that: all new residential development and retail, commercial or industrial development above a certain size provides a language action plan (LAP); and large-scale housing or employment sites on windfall sites provide a Welsh language impact assessment (WLIA). The principle of assessing windfall sites for language impacts is consistent with national policy and advice in TAN 20 which says that site allocations should not be subject to Welsh language impact assessment as this would duplicate the ISA and site selection processes. The requirement for a LAP in certain instances is a recommendation from the ISA and impact assessment which recommend mitigation measures such as promoting education capacity, Welsh language awareness and learning opportunities, and supporting organisations facilitating community participation through the medium of Welsh. A separate SPG on this topic will advise on implementation of the policy and mitigation measures.
- 4.45 However, as drafted, the policy lacks clarity and certainty which will undermine its effective application. To ameliorate this, **MAC 032** amends Policy WL1 to clarify that: proposals for 5 or more dwellings which will, individually or cumulatively, result in housing development which exceeds the indicative housing provision set out for the settlement must provide a LAP; proposals for large scale housing development and employment sites on windfall sites will be required to submit a WLIA; and to address matters in relation to bilingual advertisements.
- 4.46 In addition, to assist in the application of the Policy WL1, **MAC 032 and MAC 129** amend the Plan to include a table showing an indicative housing land supply figure for each settlement, and a new indicator [**MAC102**] intended to monitor development within these settlements annually and to allow for an assessment of the need for a LAP.
- 4.47 Overall, we are content that the proposed revisions to Policies SP8 and WL1 are based on robust and credible evidence, will ensure the effective application of the policies and accord with national policy that seeks to safeguard, promote and enhance the Welsh Language

Placemaking and sustainable design

- 4.48 Policies SP12 and PSD1 - 13 provide a framework to manage the interrelationship between placemaking and sustainable design, ensuring that all new development in the County makes a positive contribution to its social, economic, environmental and cultural well-being. In doing so, the policies address issues in relation to placemaking, design, masterplanning, green and blue infrastructure (GBI), development and the circular economy, community facilities, open space, advertisements, noise, air and light pollution and contaminated land. Matters in relation to community facilities and public open space are addressed in the Prosperous People and Places – Housing and Community Infrastructure and Healthy Habits – Natural, Built and Historic Environment chapters.

- 4.49 To ensure that new development recognises local distinctiveness, is resilient to climate change and delivers net benefits for biodiversity, Policy SP12 sets out placemaking criteria. To ensure that the framework addresses accessibility for all highway users, **MAC 045** amends Policy SP12 (i) to include reference to equestrians. Further revisions to the policy framework for management of new equestrian facilities are provided by **MAC 063** which amends Policy RD5 to clarify that proposals should be of an appropriate scale and nature appropriate to the setting.
- 4.50 Policy PSD1 requires proposals to exhibit quality design solutions in accordance with placemaking principles. To ensure consistency with PPW and improve clarity, **MAC 046** amends Policy PSD1 to refer to the 'principles of placemaking' rather than 'sustainability objectives' and 'massing' instead of 'dimensions'. Similarly, **MAC 047** and **MAC 049** amend Policy PSD3 to provide clarity about the scope and requirements for GBI and to the reasoned justification of Policy PSD4 to provide certainty about the approach to be taken to the provision of trees, woodlands and hedgerows.
- 4.51 Whilst Policy PSD9 of the Plan provides the mechanism for managing advertisements in the County. The requirements of the policy in relation to amenity and public safety issues are not locally distinct and replicate the requirements of the Town and Country Planning (Control of Advertisements) Regulations 1992, as amended. Consequently, **MAC 055** deletes Policy PSD9 and directs that Policy WL1 addresses the requirement for advertisements to be bilingual.
- 4.52 Subject to MACs, we are content that Policy SP12, and the supporting placemaking and sustainable design policies provide a constructive framework which will ensure that all new development in the Plan area meets the requirements of the National Sustainable Placemaking Outcomes and contributes positively towards the achievement of the well-being goals.

Supplementary planning guidance

- 4.53 The submitted Plan sets out a programme for the production of a range of Supplementary Planning Guidance (SPG). The SPG will cover a range of topics including Caeau Mynydd Mawr SAC, affordable housing, homes in rural villages, Burry Inlet, placemaking and sustainable places, nature conservation and biodiversity, built and historic environment, landscape character, planning obligations and Welsh Language. **MAC 120** updates the timescales for the production of the guidance, which will be prepared over a 6 to 24 month period following adoption of the Plan.

Conclusion

- 4.54 Subject to the recommended changes, we conclude that the vision, objectives, and strategy, and retail and placemaking policies are soundly based, consistent with the requirements of national planning policy and conform with FW.

5. Prosperous people, and places – housing and community infrastructure

Housing provision

- 5.1 Planning Policy Wales, paragraphs 4.2.6 and 4.2.7 make clear that the latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, form a fundamental part of the housing evidence base for development plans.
- 5.2 The findings of the 2021 Census for Carmarthenshire shows that the County has a population of 187,900, an increase of 4,100 people or 2.2% since the 2011. This data is supported by the findings of the 2018-based principal population projections which indicate that the population of the County could grow by 6,197 people by 2033. The level of growth experienced is attributable to net in-migration largely from the UK and defies the underlying natural trends in the County which show: that the forecast number of deaths will continue to be higher than the number of births; a significant increase in the number of people aged over 65 years; and a decrease in the number of people aged 0 to 64 years [CSD70, sections 2 and 3].
- 5.3 The 2018-based Household Projections show a projected increase of 4,359 households over the Plan period. This projection takes account of an anticipated reduction in the size of households in the County from 2.3 people in 2001 to 2.2 in 2031 and would result in an annual HR 42% lower than the historic trend for housing completions in Carmarthenshire [CSD39, paragraph 39 and CSD11, paragraph 8.5].
- 5.4 The Council recognises that in light of the trends, the conversion of the household projections, without any adjustment for local circumstances, would result in limited growth potential for Carmarthenshire.
- 5.5 As outlined earlier, the Council commissioned the Housing and Economic Growth Report [CSD34] to identify and test a number of different housing growth scenarios. The report concluded that the ten-year trend-based scenario would, when adjusted to take account of local circumstances, provide a requirement for 8,822 new homes over the plan period which was considered the most appropriate option. It is considered that this level of growth would provide sufficient provision to ensure the delivery of sustainable housing growth within the County and in doing so, assist in addressing the underlying natural population trends [CSD70, paragraph A.1.36].
- 5.6 On the basis of the submitted evidence, we are content that the approach taken to the definition of the HR has been undertaken in a considered manner, has had regard to demographic, Countywide and policy related factors, and as a consequence, is robust.

Housing supply

- 5.7 Policy SP4 provides a framework for the delivery of the HR figure of 8,822 over the Plan period. To deliver this requirement and to promote the creation and enhancement of sustainable communities, the policy identifies a Housing Supply (HS) of 9,704 new dwellings. The Council's Statement for Hearing Session 2 indicates that the HS is made up of;

- 4,565 dwellings on committed sites (sites with planning permission, including those under construction and completed during the Plan period),
- 2,259 dwellings on new housing allocations,
- 1,305 dwellings on large windfall sites, and
- 1,575 dwellings on small windfall sites.

Inherent in the HS is a flexibility allowance which equates to 882 dwellings or 10%.

- 5.8 The housing allocations comprise 82 sites ranging in size from 5 to 247 dwellings and provide just under a quarter of the supply.
- 5.9 The committed sites account for nearly half of the HS. To ensure that the sites included in the HS are deliverable during the Plan period, the Council conducted a review of all sites with planning permission for residential development in the County. Of the 118 sites reviewed, 37 (approximately 32%) were considered unlikely to be developed during the Plan period. As a consequence, these sites were discounted from the HS. The remaining 81 sites were included in the supply [CSD75, Appendix 6 and AP 2/3]. Based on the evidence presented, we are content that the committed sites figure contained in the HS is robust and the sites are deliverable during the Plan period.
- 5.10 In their Statement for Hearing Session 2, the Council explained that, based on recent monitoring data, it was clear that the large and small windfall figures contained in the submitted Plan could not be achieved and, as a consequence, there would be a shortfall of the projected figure of 2,880 by some 659 dwellings [Council Statement for Hearing Session 2, Q2 a].
- 5.11 To address this shortfall in provision, **MAC 004, MAC 011 and MAC 012** amend Policies SP4 and HOM1 to include land for an additional 769 dwellings. This would be achieved through a combination of 14 new allocations and 16 committed sites and would increase the HS figure to 9,814 dwellings. In order to ensure clarity about the geographical extent of the sites, relevant amendments to the proposals maps are made by **MACM/PrC1/c, MACM/SeC6/c, MACM/SeC7/a, MACM/PrC3/a, MACM/PrC3/b, MACM/PrC3/c, MACM/PrC3/d, MACM/PrC3/g, MACM/SuV59/a, MACM/PrC1/a, MACM/PrC1/b, MACM/SeC1/a, MACM/SuV2/a, MACM/PrC2/a, MACM/SeC3/a, MACM/SeC3/b, MACM/SeC6/a, MACM/PrC3/e, MACM/PrC3/f, MACM/SuV25/a, MACM/SuV37/a and MACM/SeC19/a.**
- 5.12 In light of the evidence presented, we are content that **MAC 011 and MAC 012** are necessary to ensure both the adequacy and robustness of the HS over the plan period. They are based on comprehensive and credible evidence which clearly demonstrates the deliverability of these additional sites.
- 5.13 To clearly differentiate between allocated and committed sites, **MAC 013**, amends Policy HOM1 by the deletion of those sites which have planning permission. Those committed sites remain within the overall HS, albeit not as allocations, and their details will be retained in Appendix 7 of the RLDP. In addition, to provide clarity about the allocations, **MAC 126**, includes a schedule which provides detailed information in relation to matters such as the individual characteristics, development requirements and delivery of each site.

- 5.14 The revised windfall element of the supply provides for 2,110 dwellings to be constructed on unallocated sites during the Plan period. This comprises 1,504 dwellings on small windfall sites and 606 dwellings from large windfall sites over the period. This equates to a combined annual delivery rate of approximately 141 dwellings. The allowance has been calculated having regard to the historic trend data in respect of completions on large and small windfall sites over the period 2007/8 to 2022/23, updated to allow for data for 2023/24 [CSD75], Section 3 and Council Statement for Hearing Session 2, Q2 a].
- 5.15 Although no evidence has been submitted in respect of the capacity for settlements in the County to accommodate additional development, historic trend data has been presented which shows that planning permission has been granted for 2,030 dwellings on windfall sites between 2015/16 and 2023/24. This equates to an average of 225 dwellings per annum. When extrapolated over the first 6 years of the Plan period this accounts for 1,350 dwellings, which is approximately 60% of the allowance for windfall sites within the HS. Whilst many of these sites have yet to be developed, it is clear that they have the potential to make a substantial contribution towards the delivery of the HS windfall element over the Plan period [AP2/2, Appendix 3 and 4].
- 5.16 Updated monitoring data from March 2025 [AP 2/6], indicates that since the submitted base date: the number of actual completions has increased from 2,137 to 3,017 dwellings; in terms of anticipated completions, there was a reduction in the number of dwellings on sites with planning permission, which includes those under construction, from; 4342 to 2750 the number of dwellings on allocated sites has increased from 2,482 to 2,685; and the total number of dwellings to be delivered from windfall sites has fallen to 1,362 dwellings.
- 5.17 The HS figure includes a flexibility allowance. Subject to **MAC 011 and MAC 012** the flexibility allowance would be increased from 10% in the submitted Plan to just over 11% which equates to 992 dwellings. This level of provision is equivalent to the Plan's anticipated annual build rate for a period of between 1 and 2 years and would in our view be sufficient to overcome any shortfall in provision that may occur during the latter part of the Plan period. We are therefore content that the approach represents a realistic and sensible way of maintaining the delivery of housing over the Plan period.

Housing distribution and delivery

- 5.18 The housing allocations and committed sites identified in Policy HOM1, as amended by **MAC 013**, will be distributed in accordance with Policy SP3. The growth within each tier of the settlement hierarchy and cluster in Carmarthenshire will be as follows:

Table 6 - Settlement Hierarchy	Tier	% Distribution of housing allocations and committed sites (approximately)
Principal Centres	1	55%

Service Centres	2	31%
Sustainable Villages	3	11%
Rural Villages	4	3%

Table 7 - Clusters	No.	% Distribution of housing allocations and committed sites (approximately)
Carmarthen and its Rural Areas	1	24%
Llanelli and the Southern Gwendraeth Area	2	42%
Amman and Upper Gwendraeth	3	20%
Teifi	4	3%
Upper Tywi	5	2%
Western Carmarthenshire	6	9%

- 5.19 Tier 1 and 2 settlements would be the primary focus of new housing development with 4,723 dwellings constructed in the Principal Centres and 2,660 dwellings constructed in the Service Centres over the Plan period. Provision within these settlements would, largely, be based on a combination of allocated and committed sites. The delivery of new housing in Sustainable and Rural Villages would generally be dependent on allocated sites and small and large windfall development.
- 5.20 Table 7 indicates that approximately 86% of the housing development within the Plan area would be within Clusters 1, 2 and 3. This is reflective of the presence of 3 Principal Centres and 11 Service Centres within these Clusters which act as a focal point for growth within County.
- 5.21 Overall, we are content that this approach taken in the RLDP, as amended by the MACs, would ensure a realistic and balanced distribution of market and affordable housing, and fully accord with the requirements of the Plan's Spatial Strategy.
- 5.22 In order to meet the HR figure of 8,822 dwellings, 588 dwellings per annum would need to be constructed in the County throughout the Plan period. Subject to **MAC 123 and MAC 124**, the trajectory indicates that between 2018 and 2023 2,326 dwellings were constructed, that between 2023 and 2028 3627 dwellings are projected to be constructed and between 2028 and 2033 a further 3861 dwellings are expected to be constructed. The growth in delivery rate anticipated in the trajectory would result in the average build rate increasing from just over 465 dwellings per annum in the first five years of the Plan period to 734.8 dwellings per annum in the last five years. This increase is largely attributable to construction taking place on a number of large-scale allocated and committed sites between 2028 and 2033.

- 5.23 Whilst the delivery rates in the later stages of the Plan period are ambitious, we are satisfied that the trajectory is based on the best available evidence, represents a realistic assessment of the likely build rate in the County over the Plan period and is consistent with the growth requirements outlined in the Plan and FW.

Other housing policies

- 5.24 Proposals for housing development on unallocated sites within Tier 1, 2 and 3 settlements will, subject to the requirements of **MAC 014**, be assessed in accordance with the requirements of Policy HOM2. The mechanism for managing small scale housing within the Tier 4 and rural settlements is provided by Policy HOM3. To provide certainty with its application **MAC 015**, amends Policy HOM3 to include new / revised criteria which seek to manage the siting, nature, scale and design of proposed development to ensure that it does not have an adverse impact on the character, appearance and vitality of the settlement and its community, result in ribbon development or urban sprawl. In our view, the revised approach in Policy HOM3 provides greater clarity about its requirements and accords with the objectives of national policy to manage development in the countryside.
- 5.25 The submitted RLDP does not contain a policy which addresses the issue of housing density. The absence of a benchmark dwellings per hectare figure, means that the plan lacks the certainty necessary to ensure the provisions of Policies SP4, SP12, HOM1, PSD1 and PSD4 are achieved. To ameliorate this, **MAC 057** adds a new policy which seeks to ensure that new housing development within Tiers 1-3 of the settlement hierarchy has a net density of 50 dwellings per hectare. In doing so, the policy makes clear that 50 dwellings per hectare is a starting point and that higher or lower density development may be acceptable subject to social, economic and environmental considerations.
- 5.26 Policy HOM6 provides the framework for assessing proposals for specialist housing. To clarify application of the policy, **MAC 018** ensures that, as well as demonstrating that they are viable and sustainable, proposals for specialist housing outside and not adjoining the defined development limits are required to meet a clearly defined need. Policies HOM7 and HOM8 are also amended to ensure that a clear framework is provided for the assessment of proposals for the renovation of derelict or abandoned dwellings and residential caravans (**MAC 019** and **MAC 020**).

Community infrastructure

- 5.27 The framework for the management of community infrastructure in the County is provided by Policy SP9 which requires that proposals for new development are directed to sustainable locations where the infrastructure, services and facilities considered necessary to deliver and support the proposal are available, or where it can be demonstrated that appropriate provision could be made. The evidential basis for Policy SP9 is provided by the Infrastructure Assessment Topic Paper [CSD78] which provides an overview of the new infrastructure that will be required over the Plan period. These include new transport and active travel provision, education and social facilities, green and blue infrastructure, utilities and environmental management.

- 5.28 In support of Policy SP9, Policies INF1, INF2, INF3 and INF4 provide a mechanism for managing planning obligations, maintaining and enhancing healthy communities, providing broadband and telecommunications, and servicing rural allocations outside public sewerage system catchment areas. To ensure a clear and consistent approach is taken to securing planning obligations, **MAC 033** expands the requirements of Policy INF1 to include measures to mitigate the impact of new development on ecology and to relocate the administrative requirements in respect of viability assessments to the policy's reasoned justification. Similarly, **MAC 034** and **MAC 035** amend Policies INF2 and INF3 to provide clarity about the requirements for a health impact assessment to be undertaken in respect of major development proposals, and the need for new high speed broadband infrastructure to be provided as part of all new social and employment related schemes. **MAC 037** revises Policy INF5 to ensure development does not have an adverse impact on the integrity of nutrient sensitive riverine and marine SACs.
- 5.29 As drafted, the submitted Plan does not include a framework for managing the retention of community facilities such as shops, post offices, public houses, or petrol filling stations in smaller settlements located outside the Principal and Service Centres. In order to address this, **MAC 052** adds a new policy which will only permit the change of existing community facilities to other uses where there is another similar or compatible facility within a convenient walkable distance; or, where applicable, within a neighbouring Sustainable Village or Rural Village; and the loss of the facility would not be detrimental to the social and economic fabric of the community. The policy makes clear that where there is no suitable alternative provision, the loss of a community facility will only be permitted where it can be demonstrated that the business for sale or let has been marketed over a 12-month period.

Conclusion

- 5.30 We therefore conclude that, subject to MACs, the provision and distribution of housing land set out in the RLDP is realistic, appropriate and founded on a robust and credible evidence. Moreover, the revised Plan's housing trajectory is realistic and has a reasonable prospect of providing and sustaining an appropriate supply of housing land throughout the Plan period.
- 5.31 Having had regard to the evidence presented, we are also satisfied that, subject to the MACs, the policy framework for community infrastructure in the RLDP is clear, based on robust and credible evidence, consistent with the requirements of national policy and in general conformity with FW.

6 Allocated Sites

Site assessment process

- 6.1 The Council called for sites between February and August 2018 which resulted in the submission of 926 sites, of which approximately 310 were existing LDP allocations. The majority of site submissions were for housing, whilst other submissions sought employment, mixed use, recreation and the protection of land from development. Sites were assessed through a three-stage process to determine their suitability for

allocation, details of which are provided in the Site Assessment Methodology [CSD101].

- 6.2 The first stage comprised a high-level assessment of each site against the growth strategy. Under the two-part second stage, sites with fundamental environmental constraints that could not be addressed were removed, including flood risk areas, nature conservation designations, and Scheduled Monuments. Sites that were not within or directly related to a Tiers 1-3 settlement, and not capable of accommodating 5 dwellings or more were also discounted.
- 6.3 At the second sub-stage, a more detailed assessment of site suitability was undertaken against a range of sustainability, accessibility and environmental criteria. Those sites taken forward were assessed against the ISA Framework. At the third stage, the preferred sites were subject to HRA to determine their effects, both alone and in combination, on European Designated Sites.
- 6.4 The site assessment results [CSD102-CSD118] are categorised by proposed allocations, reasonable alternatives and sites not taken forward, with a table summary for each site presented [CSD103]. These results have informed the potential dwelling and job number capacities for each site, as set out in the Growth and Spatial Distribution Topic Paper Part 1 Housing [CSD75] and Growth and Spatial Distribution – Part 2 Job Creation and the Economy [CSD76] respectively.
- 6.5 On the evidence submitted, we are content that a robust site assessment has been undertaken which demonstrates that the preferred sites comply with the overarching Plan strategy, are free from significant constraints and deliverable during the remaining Plan period. This process also explains that sites have been discounted in a consistent and logical manner. The overall approach complies with the provisions of national policy and guidance.

Common issues raised

- 6.6 The following section addresses issues that are common to several housing and employment land allocations and also deals with several of the representations received on individual sites. Matters in relation to the effects of nutrients in wastewater on allocations in riverine and marine SACs have been addressed earlier in this report.

Rolled forward sites

- 6.7. Approximately 310 sites from previous plans have been assessed for potential allocation in the RLDP. The DPM advises that for sites to be rolled forward from a previous plan into a new plan, there will need to be a substantial change in circumstances to demonstrate that they can be delivered and justify being included again.
- 6.8 Rolled forward allocations have been subject to the same assessment as new sites. The Site Assessments documents [CSD104-109] explain where additional evidence has been sought from landowners and promoters to justify their inclusion. Several statements of evidence and statements of common ground [CSD121, 122, 123, 124, 127, 138, 145, 150, 153, 159, 176, 177, 180, 184, 187, 190 and 202] have been prepared and agreed with the Council to support site delivery during the remaining Plan period.

- 6.9 As summarised in the Site Assessment Table [CSD103], 44 housing and 11 employment sites, have been rolled forward, in total or in part, or allocation in the RLDP. Separately, several rolled forward sites have gained planning permission, and are now commitments. Certain rolled forward sites, including SuV51/h1 Opposite Village Hall, Cwmifor, SeC8/h2 Cae Linda, Trimsaran, SeC15/h1 Land to North of Dan y Crug, and SeC16/h1 Llandeilo Northern Quarter, have reduced site areas. This is either because planning permission has been granted on part of the site, or that reducing the site area would make them more deliverable.
- 6.10 The primary reason for not rolling allocated sites forward is uncertainty with their delivery. The reasons typically relate to no firm intention from landowners to bring forward those sites over the intervening years, physical delivery issues such as access (T3/5/h5 Land at Heol Glan Gwendraeth, Pontyates/Meinciau and SC18/h4 Adjacent to Ffrwdwen), no planning applications submitted or lapsed permissions where no development has commenced. Some rolled forward sites remain within the development limits and could potentially come forward as windfall development within the Plan period.
- 6.11 Whilst we note the concerns raised in relation to the deliverability of some rolled over sites, we are satisfied that the approach taken in reevaluating these sites has been rigorous and that the evidence demonstrates they can be delivered during the Plan period.

Committed Sites

- 6.12 The submitted Plan's HS identifies 119 committed sites. These sites benefit from planning permission; development on them has yet to commence, is ongoing or is complete (DPM Table 18).
- 6.13 During the examination concerns were expressed about the deliverability of several of the committed sites within the Plan's HS. These include, amongst others, PrC2/h4 – Land at North Dock, PrC2/h22 – Land at Cwm Y Nant, SeC7/h1 – Land at Box Farm, SeC6/h1 – Land off Clayton Road, PrC3/h4 – Tirychen Farm, PrC3/h36 – Land at Betws Colliery, PrC3/h22 – Land adjacent to Pant Y Blodau and SeC4/h2 – Land at Burry Port Harbour.
- 6.14 The Council explained in its oral and written submissions to Hearing Sessions 7 – 14, that the delays in delivery have been caused, primarily, by the need for a number of physical constraints on individual sites to be addressed, and by land ownership / market conditions. It was contended that none of these issues are insurmountable and that the committed sites would be developed within the Plan period. This is supported by discussions with landowners / developers during the preparation of the RLDP. No substantive evidence has been presented to suggest that these assertions are incorrect.
- 6.15 On the basis of the evidence presented, we are content that none of the committed sites have any significant physical constraints which would prevent their development and that, with improvement in the housing market, the sites will be constructed largely as outlined in the trajectory.

Best and most versatile agricultural land

- 6.16 The rural areas of Carmarthenshire include significant areas of Best and Most Versatile Agricultural Land (BMVAL) around many settlements, including small tranches of grade 2 land in the southeastern area of the County.
- 6.17 PPW is clear that considerable weight should be given to protecting BMVAL from development, because of its special importance. Development on BMVAL has been considered through the RLDP site assessment methodology [CSD101] and ISA [CSD16], both of which included assessment questions linked to the Predictive Agricultural Land Classification Map 2. The presence of BMVAL was a factor in many sites not being allocated [CSD111 – CSD117].
- 6.18 As indicated in the subject topic paper [CSD79], most allocations comprise non-BMVAL. In several instances, the amount of grade 2 or 3a BMVAL on allocations is modest. This applies to PrC2/h23 Dafen East Gateway, SeC7/h4 Opposite Parc Morlais, SeC15/h2 Land adjacent Bryndeilog, Tywi Avenue, PrC1/E1(i) Land west of Cillefwr Road West. Several sites containing BMVAL, such as PrC1/MU1 West Carmarthen, also benefit from planning permission.
- 6.19 Certain sites are either within or closely related to development limits. They include PrC1/(iv)- Land off Trevaughan Road, PrC1/h8 Heol Llansteffan, SeC18/h6 in St Clears, SeC19/h2 Land at Whitland Creamery, SuV61/h1 Land at Nieuport Farm, PrC1/E1(ii) Land North of Alltynap Road and PrC1/E1(iii) Land south of Alltynap. Similarly, several employment allocations in Dafen, Llanelli - PrC2/E2(i) Land East of Calsonic, PrC2/E2(iv) Land West of Heol Gors and PrC2/E2(v) Land at Heol Croppin - are in a predominantly built-up area and would in effect infill or round off established employment areas. Likewise, parts of SeC20/MU1 Laugharne Holiday Park are grade 3a but fall within the boundaries of the holiday park and are not in agricultural use or have been built on. In each of these instances, productive agricultural use of sites is unlikely given the surrounding built form.
- 6.20 In certain rural settlements, the opportunities for development on sites of lower grade agricultural land are unavailable. The presence of historic environment and flood risk constraints limit development opportunities in Llandovery and Laugharne. The Council has therefore decided to allocate a quantum of development which reflects the role and function of those settlements. The overriding need for development, along with lack of available lower grade land, justifies the inclusion of SeC12/h1 Trem Y Ddol, SeC20/h2 Adjacent Laugharne School, and SuV17/h1 Rear of Former Joinery, Station Road, Nantgaredig.
- 6.21 The above considerations demonstrate that BMVAL loss is one consideration amongst many in determining which sites to develop. With a justified overriding need for housing and economic growth of the scale envisaged, and few opportunities for development on PDL, the loss of some agricultural land is inevitable. Through the search sequence and site allocation methodology, consideration has been given to the presence of BMVAL in deciding where to allocate land. As such, we are satisfied that the site allocation selections have been justified in accordance with national policy.

Biodiversity and ecological networks

- 6.22 Edition 12 of PPW was issued by the WG in February 2024. Of relevance to the RLDP are the biodiversity revisions to Chapter 6 which explains that site allocations should follow a stepwise approach by ensuring any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for. At each step a long-term management plan must explain how a net benefit for biodiversity will be achieved alongside agreed enhancement measures. A related key change seeks to strengthen the protection of trees through a replacement planting ratio of at least 3 trees for every one lost on a site, having regard to the quality, environmental and ecological importance of those trees.
- 6.23 During the examination several concerns were expressed about the impact that the revisions to national policy could have on certain allocations. They include PrC1/h4 Parc y Delyn, Carmarthen, PrC2/h10 Land adjacent to the Dell, Furnace, PrC2/h22 Cwm y Nant, Dafen, PrC2/h4 Land at North Dock, Llanelli, PrC3/h4 Tirychen Farm, Ammanford, PrC3/h22 Land Adjacent to Pant y Blodau, Penygroes, PrC3/h14 Land at Nantydderwen, Drefach, , PrC3/(ii) Land adjacent to Pant-y-Blodau, Penygroes, PrC3/(viii) - Land r/o 108 - 114 Waterloo Road, PrC3/(ix) Breakers Yard, Gorslas, SeC7/h3 Land at Golwg yr Afon, Llangennech, SeC8/h2 Cae Linda, SeC9/h2 Heol Gelynen, Brynamman and SeC17/h1 Land Opposite Llangadog CP School, Llangadog.
- 6.24 Representors’ concerns refer to the presence of trees, hedgerows, protected species and irreplaceable habitats within these sites, and their potential impacts on site capacity assumptions and overall delivery. Reference has also been made to recent planning decisions in Carmarthenshire where ecological features had been identified, leading to reduced site capacities and, in some instances, the refusal of permission for not demonstrating the stepwise approach.
- 6.25 To address the concerns raised, the Council undertook a desktop ecological review of each of the housing and employment allocations [AP1/20]. This work supplements the assessment of ecological considerations in the individual site assessments [CSD104-109] and ISA [CSD16-20].
- 6.26 The assessment categorised each site into red, amber and green based on potential constraints and opportunities for maintaining and enhancing biodiversity. The red category comprises three housing allocations where there is potential for notable constraints, two of which (PrC2/h10 and SeC7/h3) are discussed separately below with the third benefitting from planning permission. Sites in the amber category have potential ecological features that will need to consider the stepwise approach but are generally acceptable. Green category sites generally have no notable issues, although comments typically refer to tree and hedgerow retention.
- 6.27 Whilst the stepwise process may result in revisions to site layouts and capacities, the findings do not suggest that those allocations should not be developed. Indeed, the housing capacities for each allocation are purposefully set as indicative rather than a maximum or minimum figure. We are satisfied that for most sites, the recommendations to protect trees, woodland and hedgerows, alongside any compensatory planting, can be incorporated into detailed designs without affecting site yields. Where additional survey work may be required to support individual

applications, we agree with the Council that such matters are best addressed at planning application stage.

- 6.28 Overall, we are satisfied that the assessment has robustly considered the impact on the ecology of each allocation and justified the inclusion of sites where such features apply. This approach broadly accords with the provisions of national policy.

Individual site allocations

PrC1/MU1 West Carmarthen

- 6.29 The mixed-use site comprises a significant area of undulating land on the western fringe of the town. The allocated site forms part of a much larger site, which is intended to accommodate some 700 dwellings, and has been rolled forward from the adopted LDP as a key strategic site. Other uses proposed include employment, public open space and community facilities. An approved planning and development brief [CSD125] is in place to bring forward the allocation.
- 6.30 Objections have been raised to the long timescales for delivering this site. However, 133 dwellings have been built and a further 345 dwellings have planning permission. This leaves 222 dwellings allocated in the RLDP, with a further 291 dwellings to come forward outside of the Plan period.
- 6.31 Completion of the link road in 2019 has unlocked development. The suite of position statements [CSD120], statements of common ground [CSD123 and 124] and statement of evidence [CSD121] set out the status for several land parcels, including the involvement of a national housebuilder. The allocations are phased to deliver between 25 and 38 dwellings per year from 2026-27 onwards. The assumptions are based on a broad understanding of the infrastructure contributions sought to support ongoing delivery of this strategic site, as summarised in the relevant Topic Paper [CSD78].
- 6.32 About 4.53 ha of the strategic site continues to be allocated for B class employment uses. Its proximity to the A40 and nearby facilities are benefits, whilst design details to minimise any impacts on neighbouring residents can be secured at planning application stage. Concerns have been expressed about the delay in this part of the allocation being developed. However, we were advised that the Council is currently seeking grants from WG to bring forward this land during the Plan period.
- 6.33 With the bulk of the strategic site committed, the remaining allocated supply is supported by robust evidence. Completion of the link road is a significant change in circumstances which justifies rolling forward the allocation.

PrC1/MU2 Pibwrlwyd

- 6.34 This large site comprises several fields, most of which are grade 3b agricultural land [CSD131]. Previously allocated for employment, leisure and education use, the rolled forward allocation now also includes 247 dwellings.
- 6.35 Concerns have been raised with the lack of delivery to date, the inclusion of housing and its distance from services and facilities. Whilst residential uses were not supported by a previously approved SPG, the RLDP provides an opportunity to review existing policies and sites. The FVR Update [CSD32] suggests that housing would help cross-subsidise delivery of the 8.95ha employment area within the site.

- 6.36 The indicative masterplan [CSD128] demonstrates how a mixed-use scheme could come forward [CSD32]. The masterplan incorporates placemaking principles such as shared footpaths and cycleways, bus stops, separate accesses for employment and housing areas within the site. Green infrastructure, retail, health, education and other services are either within walking distance via the underpass at the A40 roundabout, or accessible via existing bus services running along the A484. A transport assessment [CSD32] anticipates existing junctions would operate within theoretical capacity, and a review of infrastructure feasibility raised no significant issues [CSD129].
- 6.37 The land is owned by Coleg Sir Gâr and a Statement of Common Ground with the Council [CSD127] explains efforts to market the site, appoint a developer and progress an application for a supermarket. Housing delivery is ambitious at 60 dwellings per annum in 2028-29, but the evidence collectively points to progress in bringing elements of the site forward. With the inclusion of housing provision there has been a substantial change in circumstances which in our view justifies the rolling forward of the site.

PrC1/h4 Land off Parc y Delyn, Carmarthen

- 6.38 This new housing allocation is located on two sloping fields towards the northern end of the town. The narrowness of Penlan Road, from which the Parc-y-Delyn estate is accessed, and ecological features within the site, have been raised as concerns.
- 6.39 The site contains some developing woodland and boundary lines of mature trees and hedgerows, including trees subject to Tree Protection Orders either side of the site entrance. A grassland species survey would be required to establish whether the portion in the south-eastern corner of the site is irreplaceable. Whilst these factors would require the stepwise approach to be followed, they are not insurmountable barriers to development. Indeed, the indicative capacity of 17 dwellings on a site of about 1.46ha suggests that site constraints have factored into the lower yield.
- 6.40 The highways conditions along Penlan Road have featured in the decision to refuse planning permission for housing on an adjacent site. However, the Council has confirmed that a revised highway improvement scheme of road widening, passing places and east-west pedestrian links, could be supported subject to agreed details.
- 6.41 Neither the Council's ecologist nor highways officer have objected to the principle of development. Robust evidence will be required to address these matters at application stage. With delivery anticipated from 2029 onwards, we are satisfied that a workable scheme could come forward within a reasonable timescale.

SuV12/h1 Adjacent Gwyn Villa, Llanpumsaint

- 6.42 Several concerns have been raised with this rolled forward allocation for 20 dwellings, including drainage, highways, ecological and infrastructure impacts and effects on neighbouring properties.
- 6.43 In common with most other Tier 3 sustainable villages, Llanpumsaint has a range of facilities including a primary school, village hall, playground, public house and church. As the Role and Function Topic Paper recognises [CSD72], it is one of several villages that relate to Carmarthen by virtue of its road linkages, public transport and access to further services.

- 6.44 SuDS approval would be required separately before development commencement and could address any existing surface water flooding issues at the site. The relatively straight highway access appears wide enough to accommodate most two-way traffic. We have seen no substantiated evidence that the amount of anticipated traffic generated by the scheme could not be accommodated safely into the local highway network. The findings of the ecological review [AP1/20] indicates that detailed work at application stage would be necessary to establish the presence of any habitats and species including potentially irreplaceable grassland but no evidence has been presented to suggest that any issues identified could not be effectively addressed.
- 6.45 The gently sloping site adjoins properties on two sides. With a site area of about 1.5ha, concerns over potential overlooking of neighbouring dwellings could be satisfactorily addressed through design layout at planning application stage.
- 6.46 The anticipated delivery rate of 5 dwellings per year from 2027-28 onwards appears achievable and realistic given the scale of development, with the recent planning application demonstrating a change in circumstances to justify its retention.

SuV20/h1 Land adjacent to Llwynhenry Farm

- 6.47 This new allocation for 6 dwellings comprises part of a larger field which slopes down towards the Gwendraeth Fach river. Representations raise flood risk and drainage impacts as primary concerns alongside highways, effects on neighbouring properties and encroachment into open countryside.
- 6.48 Whilst noting the evidence from respondents of past flooding incidents in the field and surrounding area, our starting point with assessing flood risk is the Flood Map for Planning (FMfP), which PPW says should inform decisions on the location of new development. The site boundary has been drawn to avoid adjacent flood risk zones 2 and 3 – rivers and sea. The SCFA [CSD226] and accompanying addendum [ED9d] conclude there are no significant flood risk considerations with the allocation. DCWW raised no issues with water supply, public sewerage or the capacity at Llanddarog WwTW to accommodate the allocation.
- 6.48 The site would form a logical extension to the cluster of dwellings and would not harmfully extend built form. The relatively low density provides scope to address any design and layout concerns, with details best addressed through technical assessments at application stage.
- 6.49 There is good visibility in both directions on to the adjacent public highway. The presence of some vehicles parked on kerbs in front of terraced dwellings to the north does not harmfully restrict visibility in this direction given the road curvature and incline. Neither would the modest increase in vehicular traffic be an impediment to development in this location.
- 6.50 Another site in Porthyrhyd has received planning permission for 42 dwellings. Whilst the cumulative scale of development is noted, Porthyrhyd is a Tier 3 sustainable village which benefits from several facilities. Relatively short journeys could be made to Carmarthen or Cross Hands for key facilities such as secondary schools, banks, hospitals and leisure centres. The evidence supports allocation of this small site.

SeC16/h1 Llandeilo Northern Quarter

- 6.51 The steeply sloping site forms part of a larger allocation in the adopted LDP. Several representors wish to see the original area retained, not least because a Development Brief had been prepared and more than one access point was proposed. Although several representors refer to a submitted application for a larger scheme than the proposed allocation, that is a matter for the Council to determine and our focus in this examination is on the site extent put forward.
- 6.52 The Council cite a lack of delivery to date as the reason for the reduced site area. A significant amount of cut and fill is likely to be required to engineer a layout that accommodates the proposed 27 dwellings and associated infrastructure. Nevertheless, the resulting density would be relatively low in recognition of the landform and presence of hedgerows and trees. In viability terms, the expectations over opening-up costs would need to be reflected in the land values and anticipated landowner returns, as highlighted in the FVR Update [CSD32]. Safe vehicular access to the site would be afforded via Lôn Rhys and Parc Pencrug, whilst pedestrian connections could be made to nearby public rights of way and Maes Elfryn, with onward footway and bus stop connections to nearby facilities and services.
- 6.53 The Development Brief served the previous allocation and as per the DPM, the Council must review allocations before deciding whether to roll them forward. The change in circumstances has been explained. Whilst site delivery from 2026-27 onwards is dependent on improvements to the WwTW, there are no overriding constraints preventing delivery of this site, with sufficient flexibility within the trajectory to accommodate the allocation.

PrC2/h10 – Land adjacent to The Dell, Furnace

- 6.54 The allocated site is on the northern fringe of the Furnace district of Llanelli. The site, which is allocated for 13 dwellings, comprises a former quarry which is largely enclosed by steep and wooded walls. Vehicular and pedestrian access to the site would be afforded via an existing access point leading directly from Ynys y Cwm Road, which also serves residential properties on The Dell.
- 6.55 Concerns have been expressed that the location of the site would promote unsustainable travel patterns for future residents wishing to access everyday facilities. Whilst we note these concerns, we are mindful that the allocation is situated close to Ynys y Cwm Road (B4309), a route which offers walking, cycling and bus links between Furnace and the commercial and community facilities in Llanelli Town Centre.
- 6.56 The presence of dense scrub and woodland within the allocation have given rise to objections from representors about the impact of site development on protected habitats and species both within the site and wider area.
- 6.57 The ecological value of the site was assessed as part of the Review of Allocated Sites and the Implications of the Requirements of PPW 12, Chapter 6 [AP1/20]. The review concluded that these matters could, in accordance with Policies PSD3, NE3 and PPW, be effectively addressed through the stepwise approach during the planning application process. Whilst we recognise that the application of this approach may result in the reduction of the net developable areas of the site, we do not consider this to be a barrier to the development of the allocation.

- 6.58 In addition, the proposed allocation is defined by TAN 15 as a highly vulnerable use and identified on the FMfP as being within zone 2 and 3 (surface water and small watercourse). The allocated site was assessed as part of the SFCA update [ED9d] and it was concluded that the surface water and small watercourses implications would be considered and appropriately addressed at a planning application stage.
- 6.59 Based on the submitted evidence and for the reasons set out above, we are content that the proposed allocation is sound and can be delivered within the anticipated timescales.

SeC7/h3 – Golwg Yr Afon, Llangennech

- 6.60 The 2-hectare site is on the southeastern fringe of Llangennech. The site is allocated for 50 dwellings and will be accessed via from Morlais Road, Golwg Yr Afon and Heol Plas Isaf.
- 6.61 The allocated site is currently unused and covered in dense scrub and mature woodland. Much of the southern and eastern boundaries of the allocation are formed by large mature trees that are subject to preservation orders. In addition, during the course of the hearing session, it was suggested that there may be priority species including bats, otters and dormice on the site. The presence of both protected habitat and protected species has given rise to concerns from objectors that the development of the allocation site would have an adverse impact on the ecological value of the site and wider area.
- 6.62 As with other allocations, the site was assessed as part of the Review of Allocated Sites and the Implications of the Requirements of PPW 12, Chapter 6 [AP1/20]. The review concluded that subject to the requirements of the stepwise approach being satisfactorily addressed at planning application stage the site could be developed. Although we are mindful that this is a complex site, we nevertheless consider that the nature and scale of the allocation would provide sufficient opportunity for appropriate mitigation to be achieved.
- 6.63 In addition, the FMfP indicates that approximately 15% of the allocation, primarily along the eastern boundary, falls within the zone 3 (flood zone seas) and some 10% falls within zones 2 and 3 (surface water and small water courses). The allocation was assessed as part of the SFCA update [ED9d] and it was concluded that, subject to the provision of an FCA, the flooding, surface water and small watercourses implications could be appropriately addressed during the planning application process.
- 6.64 Overall, we are content that, subject to the requirements outlined above, the allocated site is sound and can be deliverable.

SeC6/(iii) Land at Fforest Road

- 6.65 The proposed site located on the edge of the settlement of Hendy and allocated for the construction of 35 dwellings of which 4.2 units would be affordable.
- 6.66 The site comprises an area of rough pasture which includes some semi-improved grassland, trees and scrub. Topographically, the site slopes down in a westerly direction towards the River Loughor and the countryside beyond. In ecological terms, although we note the concerns of residents, the site is not subject to a nature

conservation designation, and no substantive evidence to suggest that there are any protective species present or that its development would have a significant adverse effect on Caeau Afon Gwili SSSI.

- 6.67 Vehicular access to the site would be afforded via the modern residential road of Clos Benalt Fawr which in turn connects to Fforest Road and onward to the M4. Concerns have been expressed that the proposed allocation would have an adverse impact on highway safety and capacity in the settlement. Whilst we note these concerns, no evidence has been presented which demonstrates that there are capacity issues on the highway network or that a temporary closure of the M4 would have anything more than a short-term localised impact. Similarly, no evidence has been presented or provided which shows that the development of the allocated result in, or exacerbate the shortfall in the provision of education, medical or community facilities.
- 6.68 With regard to flooding and drainage issues at the allocated site, we are mindful that the findings of the updated SFCA (ED9d) concluded that the site wasn't subject to flood risk from either rivers and seas or surface water and small watercourses.
- 6.69 In light of the above, we consider that the proposed allocation is sound and can be delivered during the plan period.

Conclusions

- 6.70 Subject to the changes set out in this section, we are satisfied that the site allocations can be delivered whilst ensuring sufficient flexibility in the housing supply.

7 Prosperous people and places – affordable housing and gypsy and travellers provision

Affordable Housing Need

- 7.1 National planning policy requires development plans to include an authority-wide target for provision of affordable houses which is based on the Local Housing Market Assessment (LHMA) and takes into account deliverability and viability (PPW, paragraph 4.2.29). The detailed LHMA for Carmarthenshire was published in 2020 and provides numerical details of the scale and nature of the need for affordable housing, specifically social rented and intermediate housing, for the first five years of the Plan period [CSD39]. Following the issuing of a revised methodology for LHMA by the WG in 2022, the figures in the Carmarthenshire LHMA were updated. The Position Statement on LHMA 2024 (LHMA Update) provides numerical details of the need for affordable housing, which includes social rented, intermediate and low-cost housing, in the County for the period 2022 – 2027 [CSD65].
- 7.2 As a consequence of the revisions to the methodology, however, the findings detailed in the LHMA 2020 and LHMA update 2024 are not directly comparable.
- 7.3 The LHMA 2020 calculated a total housing need of 9,807 dwellings required over the plan period 2018-2033, of which 23% are affordable homes. This equates to a needs figure of some 2,255 affordable homes over the Plan period. Approximately 70% of

the defined need is for 2 and 3-bedroom properties with the remaining need being predominantly for 1-bedroom properties [CSD39, section 9]. The assessment does not provide specific figures for social rented, intermediate dwellings or low-cost housing.

- 7.4 The findings of the LHMA Update 2024 indicate that 1,674 affordable homes are required over the period 2024 – 2027, of which 513 homes would be social rented dwellings, 626 intermediate dwellings and 250 low-cost dwellings. Extrapolated over the Plan period this would equate to a need figure of approximately **5,208** affordable homes over the Plan period. The assessment indicates that approximately 50% of the defined need is for social rented properties, of which the greatest requirement is for 1-bedroom dwellings with the remaining need spread largely between 2 and 3-bedroom properties [CSD65, Figure 19].
- 7.5 Although we note the significant variation in the numerical need for affordable housing between the LHMA and the LHMA Update, we are nevertheless content that the approach taken in the assessments is consistent with the methodology promoted at national level at the time of production and, as such, provides a robust basis for the assessment of affordable housing need.

Affordable Housing Viability

- 7.6 The evidence base for affordable housing viability in Carmarthenshire is provided by the FVR [CSD31] and the FVR Update [CSD32].
- 7.7 The combination of these studies provides a high-level assessment which considers broad levels of development viability across the County's four affordable housing market areas – Rural Carmarthenshire and Market Towns, Carmarthen and the West, Llanelli, and Ammanford and the Amman Valley. The assessment employs a high-level viability model and tests a range of site typologies to determine the contribution new residential schemes can make to the supply of affordable housing in the Plan area. The assessment model contains a range of components including construction costs, land values, developer profit, section 106 contributions, fees and a contingency sum. The costs and values of these individual components are based on a fixed point in time and have been informed by detailed discussions held with the Viability Stakeholder Group during 2023 [CSD33].
- 7.8 The Council sought to agree the revised figures with the members of the Viability Stakeholder Group but this could not be achieved. Nonetheless, we are mindful that the data used to inform these revised costs is drawn from national sources, such as the All-In Tender Prices Index and the General Building Cost Index, and a range of local sources, including viability assessments submitted to support candidate sites in neighbouring counties and settlements reached in development management cases where viability has been at issue [CSD32, section 3]. In light of this, we consider that it provides a realistic and credible basis for the proposed allowances.
- 7.9 The FVA Update tested the viability model against the site typologies and concluded that variation in viability levels across the County related to the scale of development and not its geographical location. The findings indicated that on a Countywide level there was insufficient headroom to support on-site affordable housing contributions on sites of less than 10 dwellings, but that sufficient headroom exists to support

contribution of: 10% on sites comprising 10 – 19 dwellings; 12% on sites 20 – 50 dwellings; 20% on sites of 51 – 100 dwellings; and 25% sites of 101 homes or more. These results are broadly supported by the viability assessment of a number of a number of key sites within the RLDP [CSD 32, sections 3 and 4].

- 7.10 Based on the evidence presented, we are content that the FVR and FVR Update have been prepared in accordance with the requirements of national planning policy and reflect guidance in the DPM. They provide a robust and comprehensive basis on which to determine the Plan's affordable housing thresholds and targets.

Affordable Housing Provision

- 7.11 The framework for the provision of affordable housing is provided by Policies SP5, AHOM1 and AHOM2.
- 7.12 Policy SP5 of the submitted Plan outlines a minimum requirement for the provision of 1,900 affordable houses in Carmarthenshire over the Plan period. The approach to delivering this requirement is outlined in Policy AHOM 1 which requires, broadly, that: all market housing allocations and windfall sites of 10 or more dwellings make on-site contributions in Carmarthenshire; off-site contributions towards affordable housing are sought on sites of 9 dwellings or less; and that smaller single open market dwellings of 88 square metres or less are exempt from the requirement for commuted sums.
- 7.13 As a result of the revision to the HS figure, **MAC022** increases the target in Policy SP5 to 2,111 affordable dwellings and makes clear that this is a starting point for the provision of affordable housing within the County. Amendments to Policy HOM1 confirm the provision will be made through a combination of 1,844 dwellings on allocated and committed sites, 125 dwellings on windfall sites and 142 dwellings on affordable housing sites. Although we note that the revised affordable housing target would not meet the defined need for new social rented and intermediate housing in the Plan area, we are content that the approach to defining the target, including in relation to the maximum amount of affordable housing that could, viably, be secured through market-led development is realistic, deliverable, and based on robust evidence. We also note that other mechanisms exist outside the planning system to assist in meeting the need for affordable housing.
- 7.14 To provide certainty about the application of Policy AHOM1, **MAC 023** amends the policy to relocate administrative matters in relation to development viability, site size, and perpetuity to the reasoned justification. In doing so, the policy makes clear that the affordable housing target percentage noted is a target to be used as a starting point for affordable housing negotiations. Similarly, revisions are necessary to Policy AHOM2 to clarify that proposals for affordable housing exception sites will also be permitted within and adjoining settlements identified as Tier 4 - Rural Villages, to remove the unnecessary reference to 'exceptional circumstances' and, to provide a definition of local need in the reasoned justification (**MAC 024**).
- 7.15 Subject to MACs, we are satisfied that the approach taken in the RLDP to the identification and provision of affordable housing is robust and consistent with the requirements of national planning policy.

Need for Gypsy, Travellers and Showpeople Sites

- 7.16 PPW requires local authorities to “assess the accommodation needs of Gypsy and Traveller families and to allocate sites to meet the identified need”. In doing so local planning authorities are required to “demonstrate that sites are suitable for development and deliverable in the identified timescales” (paragraph 4.2.36)
- 7.17 The most recent Gypsy and Traveller Accommodation Needs Assessment (GTANA) for Carmarthenshire was published in 2019 [CSD26] and explains that, at the time of the assessment, Carmarthenshire had an established Gypsy and Traveller community who lived in a combination of caravans and ‘bricks and mortar’ dwellings. To determine future accommodation needs the GTANA identified and analysed existing secondary data sets, in relation to matters such as the Gypsy, Traveller and Showpeople population, the type of accommodation occupied and the number of authorised and unauthorised sites. A series of interviews with representatives of the Travelling communities living in the County was also conducted. The findings of the assessment indicate that there is a need for 31 Gypsy and Traveller pitches and 4 pitches for Travelling Showpeople by 2033. No specific need was identified for transit sites [CSD26, Tables 3 and 4].
- 7.18 The Position Statement on Gypsy and Travellers [CSD63] provides details of the planning permissions for 25 pitches that have been approved since the GTANA was prepared and outlines the timescale for preparing the next assessment. When these permissions are taken into account there is an outstanding requirement for the provision of an additional 6 pitches in the County within the Plan period.
- 7.19 In our view the GTANA, when considered in conjunction with the Position Statement on Gypsy and Travellers, provides robust and up to date evidence for the Plan area and, as such, provides a sound basis on which to plan for future need.

Provision of Gypsy, Travellers and Showpeople Accommodation

- 7.20 The framework for the provision of *Gypsy, Travellers and Showpeople Accommodation* is provided by Policies SP10 and GTP1
- 7.21 Subject to **MAC 038**, which provides clarity in terms of pitch numbers, Policy SP10 sets out the requirement for 13 permanent pitches to meet the identified need in the County at Land at Penyfan, Trostre, Llanelli and Penybryn (extension), Bynea, Llanelli. No specific provision is made for Showpeople.

PrC2/GT1 - Land at Penyfan, Trostre, Llanelli

- 7.22 The allocated site comprises an area of overgrown land formerly used for recreational purposes which is located close to Carmarthenshire County Council's Trostre Depot. The site would provide 7 permanent pitches.
- 7.23 The proposed allocation is defined by TAN 15 as being for a highly vulnerable use and identified on the FMfP as being in flood zone 2 (rivers) and flood zones 2 & 3 (tidal), as well as in a defended zone. The site was reviewed as part of the SFCA Update and it was concluded that, subject to the provision of a Flood Consequences Assessment (FCA) at application stage to demonstrate that the design and layout of the development incorporate appropriate resilience / resistance measures and that it would remain flood free, the site is suitable for the proposed allocated use [ED9d].

- 7.24 In addition, the Council's Hearing Session 3 Statement identified a number of potential constraints to the development of the site, including matters in relation to land stability, ecology and contamination. To provide greater clarity about these issues the Council provided a briefing note which explains the nature, scale and likely impact of these issues on the delivery of the allocated site [AP3/6]. Based on the oral and written evidence presented, we are content the issues identified can be satisfactorily addressed at application stage and therefore do not, in principle, represent a barrier to the site being allocated.
- 7.25 Funding for the scheme has yet to be secured but it is anticipated that it will be in place to allow the scheme to be delivered towards the end of the Plan period.

PrC2/GT2 - Penybryn (extension), Bynea, Llanelli

- 7.26 The allocated site is located adjacent to the existing Council owned Gypsy and Traveller site at Penybryn and intended to provide 6 permanent pitches.
- 7.27 The proposed allocation is defined by TAN 15 as being for a highly vulnerable use and identified on the FMfP as being, partially, located in the flood zones 2 & 3 (tidal) and a defended zone. The allocation was assessed as part of the SFCA update and it was concluded that, subject to the findings of a FCA at application stage, the site is appropriate for the allocated use [ED9d].
- 7.28 As with PrC2/GT1, no funding for the scheme has been secured but it is anticipated that it will be in place to allow the scheme to be delivered towards the end of the Plan period.
- 7.29 Based on the submitted evidence we are satisfied that both allocations are sound and can be delivered during the Plan period.

Development on unallocated sites

- 7.30 In addition to the allocated sites, Policy GPT1 outlines criteria which seek to manage the development of unallocated permanent or transit sites within and in the open countryside. Subject to **MAC 039**, which ensures that its provisions are realistic and deliverable, the criteria contained in Policy GPT1 accord with the requirements of WG Circular 05/2018 – Planning for Gypsy, Traveller, and Showpeople Sites and, as such, provide a sound basis for assessing planning applications.
- 7.31 In our view the framework for meeting existing and new Gypsy, Traveller, and Showpeople accommodation needs is logical and robust.

Conclusions

- 7.32 Overall, we are content that the approach to the provision of affordable housing in the RLDP, subject to the MACs, is supported by robust and credible evidence. Whilst the level of affordable housing provision sought through the Plan would not meet all of the need identified in the LHMA, we are content that the target is realistic and that the use of measures such as site-specific requirements and an exceptions policy would maximise opportunities for delivery.
- 7.33 Subject to the MACs, we are satisfied that the approach taken to determining the need for Gypsy, Traveller and Showpeople accommodation in the County is based on clear and robust evidence which has been prepared in a manner that is

consistent with the requirements of national policy and the Housing (Wales) Act 2014.

8 Prosperous places and people – employment and the visitor economy

Employment strategy

- 8.1 Carmarthenshire has a diverse economy which includes key employment sectors in manufacturing, food production and the visitor economy. Strong jobs growth in recent years has been aided in part by manufacturing, health-related services and hospitality and business services sectors.
- 8.2 The Plan’s policies seek to encourage investment and innovation in rural and urban areas to meet employment needs. Those needs derive from economic forecasts in the Carmarthenshire and Pembrokeshire Two County Economic Study [CSD41], its 2021 update report [CSD42] and the Housing and Economic Growth Report [CSD34]. The latter provides the more recent evidence and sets out three trend-based baseline economic forecasts using national household projections, ranging between 149 and 545 jobs per year that could be created between 2020 and 2033. The Council opted for the Report’s recommended mid-range baseline forecast of 354 jobs per year based on historic trends, sectoral breakdown of jobs and earlier evidence-based studies.
- 8.3 The Report also considered an alternative growth scenario which adjusted the baseline forecast to account for known and plausible investments that are likely to come forward during the Plan period. This is in recognition of, amongst other strategies, the Swansea Bay City Region Deal. The resulting growth scenario of 674 jobs per year is much higher than the three baseline forecasts. No downside adjustments have been made to the figure to account for wider economic and job market uncertainties. It would also generate a significant corresponding HR which, compared with past delivery rates, would not be realistic and could create a wide disparity between housing and jobs, contrary to the aim in PPW which seeks to align both figures to reduce the need for travel, particularly by car.
- 8.4 The Council has set out in Policy SP7 an employment land allocation of 71.21 hectares across Carmarthenshire. Since this figure is not a ceiling on employment growth, **MAC 025** removes reference to ‘sufficient’ land having been allocated. As explained in the Employment Land Review [CSD97], the land allocation figure derives from several factors, including a rationalisation of the existing adopted LDP employment land supply, and identification of new sites. The Topic Paper: Growth and Spatial Distribution – Part 2 - Job Creation and the Economy [CSD76] explains that the Plan allocations have the potential to deliver up to 6,652 jobs. The jobs to land area ratio calculations broadly follow the WG Practice Guidance – Building an Economic Development: Evidence Base to Support a Local Development Plan (August 2015).
- 8.5 The Plan’s potential jobs yield is above the baseline forecasts but falls below the alternative growth scenario. TAN 23: Economic Development advises that land provision targets may be higher than anticipated demand, to allow for flexibility, competition and choice amongst other things. The Council’s Employment Land Review 2023 [CSD97] points to a low vacancy rate of around 5% at employment

sites and is reflective of previous evidence [CSD76]. This does not indicate a constant oversupply of employment land or that its development for other land uses is being frustrated.

- 8.6 The preferred scenario of 8,822 dwellings could, according to the forecasts in the Housing and Economic Growth Report, accommodate 276 new jobs per year. This would not fully support the delivery of 6,652 jobs, let alone the preferred baseline forecast of 354 jobs per year. However, the Report assumes that, without policy intervention, there would continue to be a net out-commute of workers from Carmarthenshire, which according to the 2011 Census was 1.09 resident workers per job.
- 8.7 Most out-commuting is to nearby Swansea, recognising the cross-boundary linkages. It is unclear if this longstanding trend has altered significantly following the Covid-19 pandemic. Nevertheless, the allocation of 71.21 hectares of employment land is a policy intervention which, based on the jobs to land ratio assumptions described above, seeks to reduce the resident worker outflow. It would also present a more realistic quantum of employment land than the 674 jobs per year figure, which remains an aspiration within the LDP rather than a set target. **MAC 025** provides the necessary revisions to the reasoned justification of Policy SP7 and clarifies the Council’s approach to jobs numbers and commuting ratios. Monitoring the delivery of employment sites and travel to work patterns will be important to evaluate the effectiveness of this policy approach during the remaining Plan period.
- 8.8 Given the submitted evidence, and subject to **MAC 025**, the proposed amount of employment land is justified, being based on credible economic forecasting and reasonable assumptions for local and regional initiatives, along with appropriate land conversion ratios. It would also support the proposed amount of housing in the plan, thereby aligning with national policy and local and regional economic objectives.

Employment land supply

- 8.9 Strategic Policy SP7 sets out the overall approach towards employment development in Carmarthenshire and its component criteria are expanded upon in several supporting policies. Policy EME3 allocates 36 sites for B1, B2 and B8 employment uses. Several employment allocations have been carried over from the adopted LDP and over a quarter of the 71.21 hectare supply comprises sites with planning permission. Approximately half of the total supply is directed to Llanelli and Carmarthen, thereby reflecting their roles in FW as foci for strategic economic growth and sub regional growth respectively. Several employment sites around Llanelli, Ammanford and Cross Hands are identified in the Two Counties Study as having a larger than local economic significance. Consequently, the LDP allocates or safeguards these sites for employment uses.
- 8.10 The Swansea Bay and Llanelli National Growth Area Definition Project Research Report [CSD40] recommends refining the spatial extent of the National Growth Area to include Ammanford and Cross Hands. This evidence reinforces the centres’ economic importance and is borne out by the scale of the employment allocations in the area, some 28 hectares, which is the largest allocation of the three principal centres.
- 8.11 Concerns were expressed that several of the employment allocations in the Cross Hands area have important ecological features. The ecological value of these sites

was assessed as part of the Review of Allocated Sites and the Implications of the Requirements of PPW 12, Chapter 6 [AP1/20] which concluded that these matters could be effectively addressed in accordance with the requirements of the stepwise approach. Whilst we recognise that this approach may reduce the net developable areas of these sites, we do not consider this to be a barrier to overall development or to achieving the employment strategy.

- 8.12 The framework for demonstrating ecological connectivity within individual schemes is established through Policies PSD3 and NE3. None of these principles would be undermined through the allocation of these employment sites. Where dormice and Marsh Fritillary butterflies have been recorded in the area, Policies PSD3, NE2 and NE4 provide a robust framework through which proposals, including any necessary mitigation measures, would be assessed.
- 8.13 The findings of the Addendum to the SFCA [ED9d] indicates that several sites are within flood zones 2 or 3 for the river and/or sea. In those areas the addendum indicates they mostly form a small part of the allocation, and any impacts can be mitigated effectively in the design and layout of the scheme.
- 8.14 In addition, several employment allocations also fall within either or both flood zones 2 and 3 for surface water and small watercourses. On approximately six allocations the area affected by the constraint extends to between 10% and 40% of the site. In all cases the findings of the Addendum indicate that matters in relation to surface water and small watercourses can be effectively mitigated through site design and layout and that the sites can be delivered in the manner outlined in the Plan.
- 8.15 On the basis of the evidence presented we are content that the proposed employment land allocations are not compromised by to any significant flooding constraints.
- 8.16 The significance of the Swansea Bay City Region Deal to the economic prosperity of the county is reflected in the allocation of two strategic sites in Policy SP6 – a creative digital cluster at Yr Egin in Carmarthen which benefits from planning permission, and a mixed-use life sciences and wellness hub at Pentre Awel in Llanelli, where the development of phase 1 is underway. Both sites are also referenced in Policy SP7. Since this policy deals with employment sites, however, **MAC 025** clarifies through a reference in the reasoned justification that Pentre Awel does not form part of the allocated land supply because not all jobs created will relate to B class uses.
- 8.17 The plan lacks details on several of the employment site allocations. To address this, **MAC 028 and MAC 127** adds a schedule of allocated employment sites to the Plan which set out brief site descriptions and summaries of constraints and infrastructure issues. An amendment is also proposed to explain that other employment and related ancillary non-B class uses will be permitted on allocated sites subject to satisfying certain conditions. This was previously in the reasoned justification but since it introduces new provisions, it is necessary to include within Policy EME3.
- 8.18 Policy EME2 supports the extension and intensification of existing businesses where they satisfy several criteria. To provide clarity to the policy, **MAC 027** amends criterion a) in respect of causing environmental damage or prejudicing other redevelopment proposals. A further amendment to the reasoned justification explains

that the policy applies to existing buildings and site intensification within urban and rural areas.

- 8.19 Policy EME4 addresses employment proposals on non-allocated sites. To provide the necessary clarity, **MAC 029** confirms the spatial extent of the policy provisions within and outside of development limits, with reference to Policy SP3. Corresponding changes to the reasoned justification confirm when a business case should accompany proposals, clarify the meaning of being ‘directly related’ to a settlement, and explain that windfall schemes including B1(a) office use should satisfy the town centre-first sequential test in FW and PPW. The latter amendment is also included as a required change to Policy SP2 through **MAC 007**.
- 8.20 The employment policies support development of small businesses in rural areas where schemes are justified and appropriate to their surroundings. This includes locations adjacent to and outside of development limits. The absence of allocated employment sites beyond those in Policy EME3 does not prevent proposals for appropriate small-scale enterprises from coming forward in the rural areas. This is addressed through Policy EME4’s criteria-based approach. Through these policies, the co-existence of housing and local employment opportunities will assist in further promoting sustainable travel patterns. Recognising recent trends in homeworking, Policy EME5 also applies to rural and urban areas in supporting home-based business proposals that require planning permission, where they satisfy criteria relating to the site’s local context.
- 8.21 Subject to MACs, we consider that Policies EME2, EME4 and EME5 provide a robust framework to consider employment proposals beyond allocated sites across the plan area. They also demonstrate a positive approach in supporting the employment needs of rural areas, thereby aligning with national policy.

Safeguarded employment sites

- 8.22 Policy EME1 safeguards existing employment sites for B-class uses through a criteria-based approach. To provide certainty, **MAC 026 and MAC 128** amend Policy EME1 to clarify its scope and interpretation. Measures include: deleting the superfluous term ‘exceptional’; adding detailed guidance on the assessment of proposals which would result in the release of existing employment sites for alternative uses; and adding reference to the town centre first approach in national policy, which applies to proposals for B1(a) office use. A detailed list of safeguarded sites will be added to the Plan appendices with sites cross referenced on the proposals map (**MACM/PrC1/d, MACM/PrC2/d, MACM/PrC2/e, MACM/SeC4/a, MACM/SeC5/a, MACM/PrC3/h, MACM/SeC13/a, MACM/SuV36/a, MACM/SeC15/a, MACM/SeC16/a and MACM/SeC19/b**). Given the evidence and subject to these necessary amendments, we conclude that Policy EME1 accords with national policy and guidance.

Visitor economy

- 8.23 The significance of the tourism industry to Carmarthenshire is reflected in Policy SP11 which supports extensions to existing schemes as well as new tourism and visitor economy related developments, subject to necessary environmental and technical matters. **MAC 040** is needed to confirm that all criteria within Policy SP11 should be considered when assessing relevant schemes.

- 8.24 Proposals for visitor attractions and facilities are supported through Policy VE1. The policy differentiates between sites within or directly related to defined settlements, and sites elsewhere in the plan area. In the latter instance, the policy wording is confusing in terms of its requirement for a sequential approach to site selection and the need for the sites to be 'demonstrably reliant' on specific locational attributes. **MAC 041** and **MAC 058** therefore make clear that schemes outside and away from defined settlements will only be permitted where they accord with national planning policy. In addition, the Policy SP3 settlement hierarchy is cross-referenced.
- 8.25 A further change to Policy VE1 removes 'where appropriate' in respect of sites being accessible by various transport modes, since it is unclear where it would not be appropriate for proposals to be so.
- 8.26 Policy VE2 addresses permanent holiday accommodation and differentiates between locations within or adjacent to defined settlements and those elsewhere in the plan area. **MAC 042** clearly stipulates policy support for high quality serviced and self-catering accommodation in those locations, albeit subject to stricter control outside of development limits. Cross-reference to the residential rural conversions Policy RD2 is necessary since it would also apply to such schemes.
- 8.27 Proposals for touring caravan, camping and non-permanent alternative camping accommodation are covered under Policy VE3, which supports new sites and alterations to existing sites where they satisfy certain criteria. One of these criteria refers to there being no overconcentration of sites within the area. Without any further explanation of how this would be assessed, the policy is vague. **MAC 043** clarifies the policy scope and explains in the reasoned justification that overconcentration encompasses the number, density and pattern of similar facilities in an area, together with consideration of cumulative visual and/or environmental impacts. Reference to excessive hardstanding areas has also been removed from a separate policy criterion since it is included in the reasoned justification.
- 8.28 Policy VE4 covers static caravan and chalet sites and permanent alternative camping accommodation. Different criteria apply to new and existing sites, with new sites subject to stricter locational measures. **MAC 044** specifies that under both scenarios, all corresponding criteria apply.
- 8.29 The Council has, through Policy SG1 and allocation SeC20/MU1, included land at Laugharne Holiday Park for a mix of tourism and leisure uses. Whilst the site owners wish to see the allocation expanded to include a second phase of development, this is disputed by the Council who maintain that the allocation is sufficient to meet current needs and further site expansion should be assessed in accordance with Plan policies. Whilst we note the landowners' concerns, we are of the view that the framework provided by Policies VE1, VE2, VE3 and VE4 is sufficient to allow for the consideration of future proposals to extend the site. As such, we do not consider that any further changes are required to Policy SG1 or allocation SeC20/MU1.
- 8.30 Although holiday accommodation may be used as second homes, their occupancy is typically limited to short-term periods through planning conditions. The impacts of second homes and short-term lets on the viability of communities is being considered by the Council on a broader basis including, amongst other things, the effects of Council tax measures which have been introduced. The completion of that work could inform future policy controls. There is, however, no evidence before us

that the Council's plan-led approach towards holiday accommodation is affecting or has impacted significantly on the location or number of second home properties across the area.

- 8.31 Subject to the changes set out in **MACs**, Policies SP11, VE1, VE2, VE3 and VE4 provide an appropriate basis for determining tourism-related proposals. The policies are appropriate as they provide a basis to deliver on the plan objective to make provision for sustainable and high-quality year-round tourism related initiatives. This would accord with the sustainable tourism aims of PPW paragraphs 5.5.1 – 5.5.7 and FW Policies 5 and 29.

Conclusions

- 8.32 Overall, we are content that the policy framework provided in the Plan in respect of employment and the visitor economy is clear, robust and complies with national planning policy and FW.

9 Healthy habits – natural, built and historic environment

Natural environment

- 9.1 Carmarthenshire's diverse natural landscape includes coastal areas, estuaries, upland, valleys, fields and woodlands. They are home to a range of habitats and species. The breadth of habitats includes SACs, Special Protection Areas, a RAMSAR site, Sites of Special Scientific Interest, National Nature Reserves, and Local Nature Reserves.
- 9.2 Policy SP14 provides the framework for protecting and enhancing Carmarthenshire's nature conservation and biodiversity value. In doing so, the policy makes clear that proposals must reflect the role that natural environment aspects and features and an ecologically connected environment have in protecting and enhancing biodiversity, defining the landscape, contributing to well-being and to the sustainable management of natural resources.
- 9.3 As drafted Policy SP 14 repeats national planning policy and lacks clarity about how its requirements will be implemented. To ameliorate this, **MAC 064** revises the policy to include reference to 'Ecosystem resilience', 'resilient ecological networks' and 'irreplaceable natural resources'. To avoid repetition and ensure currency, it deletes reference to European, national and local / area-based policy.
- 9.4 In addition, **MAC 064** amends the reasoned justification of Policy SP14 to include a requirement for proposals to be accompanied by a Green Infrastructure Statement, and to explain the approach set out in legislative and national planning policy for the assessment of development proposals.
- 9.5 Policy NE1 covers regional and local ecological, geological and geomorphological sites. **MAC 065** makes several changes to the policy and its reasoned justification to address revisions to PPW. These include adding peatland habitat to the list of sites considered, referencing the stepwise approach and maintaining ecological connectivity.

- 9.6 The criteria-based approach in Policy NE2 seeks to ensure suitable protection of habitats and species from harmful development. To ensure consistency with other policies and PPW, **MAC 066** replaces the reference to the mitigation hierarchy in criterion a with the stepwise approach, and includes a reference to ensuring a net benefit for biodiversity under criterion b.
- 9.7 Further changes to the policy’s reasoned justification explain that the stepwise approach would apply to the exceptional circumstances where the reasons for development clearly outweigh biodiversity and nature conservation interests, and reference information sources held by Local Environmental Record Centres, given their relevance for informed decision-making. Together, the changes through **MAC 066** ensure the Plan’s consistency with national policy.
- 9.8 Policy NE3 seeks to ensure the appropriate protection and management of ecological corridors, networks and features of distinctiveness. Given its content and structure are similar to Policy NE2, **MAC 067** amends criterion a to refer to the stepwise approach in place of the mitigation hierarchy, and the reasoned justification to reference the DECCA Framework for promoting ecological resilience. It also clarifies what is meant by exceptional circumstances in criterion c. Again, these necessary changes are consistent with national policy.
- 9.9 The Caeau Mynydd Mawr SAC sustains one of Wales’ most important marsh fritillary butterfly populations. Its long-term security and resilience depend on maintaining an extensive and well-connected network of suitable habitat. The Council has mapped an area wherein development proposals will be required to contribute towards increasing the quality and amount of available habitat for the marsh fritillary butterfly [CSD46 - CSD49].
- 9.10 Policy NE4 provides the policy basis for the Caeau Mynydd Mawr project and explains that planning obligations may be sought from development proposals within the area [CSD87]. As submitted, Policy NE4 lacks clarity on its scope and application. **MAC 068** makes several necessary changes. It refers to the project area defined on the Proposals Map; renames the ‘SPG area’ as the ‘project area’; relocates the administrative test from the policy to the reasoned justification; and clarifies how the policy would be implemented. Together, these changes ensure the policy provides certainty about its application and complies with national policy.
- 9.11 Policies NE5 and NE6 cover coastal management schemes and development proposals in coastal locations, respectively. Although the objectives are clear, revisions are required to explain the approach to implementing policy requirements. As such, **MAC 069** explains that all criteria within Policy NE5 should be applied when assessing proposals and refers to Policy SP14 in the reasoned justification. Similarly, **MAC 070** clarifies that Policy NE6 relates to proposals in developed and undeveloped coastal locations, and that all corresponding criteria should apply. Additional wording proposed to the reasoned justification aids policy interpretation.
- 9.12 A Coastal Change Management Area (CCMA) has been identified in the Shoreline Management Plan 2 [RPG6] to guide future development considerations in the coastal area. Policy NE7 sets out the Plan’s position for different development types within the CCMA. Given its wide scope, the policy is long and lacks clarity. It is therefore necessary to split the policy in two, addressing residential and non-residential developments respectively under new Policies NE7 and NE8. **MAC 071**

makes this change and confirms that residential proposals within the CCMA will not be permitted rather than not supported. A further change confirms that proposals for the relocation of dwellings from within the CCMA should relate to settlements as defined within Policy SP3. Given these policies refer to a designated area, a change to the reasoned justification explains where the mapped extent of the CCMA can be viewed online.

- 9.13 With **MACs 069, 070 and 071**, the amended Policies NE5, NE6 and NE7 provide an appropriate and framework for managing development in coastal locations.

Built and historic environment

- 9.14 Strategic Policy SP15 sets out the Council’s approach towards the protection and enhancement of the built and historic environment. The associated Policy BHE1 covers listed buildings and proposals in conservation areas; in doing so it largely repeats national policy and legislation. **MAC 072** therefore deletes Policy BHE1 and moves the locally distinct reference to area special characteristics into Policy SP15.
- 9.15 **MAC 074** transfers parts of Policy BHE1 to the reasoned justification of Policy SP15 and clarifies matters such as the need for relevant proposals to be accompanied by a Heritage Impact Statement in accordance with the Historic Environment (Wales) Act 2023. Further amendments to the reasoned justification are required to acknowledge that Historic Parks and Gardens and Scheduled Monuments are designated on the LDP Constraints Map rather than the Proposals Map. These are addressed through **MAC 073**.

Landscape

- 9.16 Carmarthenshire’s landscape is vast and varied. Consistent with national policy, the Council has applied evidence from LANDMAP, a national dataset of landscape information, to inform the emerging Carmarthenshire Landscape Character Assessment (LCA) The study divides the Plan area into 28 different Landscape Character Areas and describes the landscape characteristics and qualities of each area.
- 9.17 The Council intends to adopt the LCA as SPG and use the evidence to determine proposals. However, planning policy should not be set through SPG. Policy BHE2 sought to maintain the overall integrity of landscape character through several broad criteria which were lacking the necessary detail about its application. To address this, **MAC 075 and MAC 130** proposes amendments to Policy BHE2 based on the LCA outputs. The policy criteria have been expanded and crucially, there is now reference to the LCA as the underlying evidence source. This provides an important basis upon which to assess proposals, having regard to the key characteristics and valued qualities of each Landscape Character Area. The reasoned justification explains how the LCA will be used to assess the landscape impacts of development proposals. A new appendix will list all landscape character areas with an accompanying diagram showing the boundaries at a high level.
- 9.18 Whilst all development proposals should protect and enhance identified landscape features, the detailed policy criteria will apply to schemes located outside of development limits. This approach aligns more closely with the findings for each landscape character area. Further changes explain in more detail when different landscape assessments would normally be required to accompany planning

applications. Finally, revisions to the reasoned justification explain in more detail how and when the policy would apply.

- 9.19 The revisions to Policy BHE2 do not identify special landscape areas (SLA). However, there is no requirement for the Council to do so, since SLA are non-statutory designations and should be applied only where there is good reason to believe that normal planning policies cannot provide the necessary protection. Neither is there any requirement to explain why SLAs have not been included in the RLDP, since it is a new plan with its own evidence base which is not beholden to the ALDP which was prepared several years ago.
- 9.20 The Council’s approach does not mean that rural areas will be more susceptible to speculative development proposals, in the absence of designated SLAs. Indeed, the chosen approach complies with the broad thrust of national policy on landscapes and strict control of development in the countryside.
- 9.21 The changes proposed through **MAC 075 and MAC 130** are necessary to provide clarity about the assessment of development proposals in Policy BHE2 and ensure the conservation and enhancement of Carmarthenshire’s distinct landscapes and seascapes.

Provision of open space

- 9.22 Policies PSD7 and PSD8 address the protection and provision of open space across the plan area, respectively. The Public Open Spaces Assessment (POSA) [CSD23] provides a comprehensive study of existing formal and informal open green spaces. Several open spaces are identified on the Proposals Map and Policy PSD7 sets out a criteria-based approach towards their protection. Since it is unclear whether the policy applies only to those mapped areas, **MAC 053 and MAC 119** explain in the reasoned justification that the policy scope extends to areas identified within the POSA and other areas that comply with the plan’s definition of open space. This clarifies that the policy scope is not confined to those areas on the Proposals Map. The open space definitions in the policy’s reasoned justification and the Plan’s glossary have been amended to be consistent with each other.
- 9.23 Several representors sought to protect land at the former Glanamman Hospital through the provisions of Policy PSD7. Whilst the land may have recreation value to the community and be accessed by the public, it is in private ownership and has not been put forward for open space purposes by the landowner. It is not within our gift to safeguard land where there is no formal landowner consent in place. Should any development proposals for the site come forward in the future, the RLDP policy framework would require landscaping and, in the case of housing development, open space provision in accordance with the relevant standards.
- 9.24 Policy PSD8 sets out the approach towards securing open space provision for residential developments of 5 or more dwellings. The policy would benefit from referencing the open space standards contained in the POSA. The standards have also been subject to public consultation as part of the draft Open Space SPG, with no further revisions proposed. **MAC 054** incorporates the necessary detail on open space standards within Policy PSD8 and reasoned justification, benefitting its implementation.

Conclusions

- 9.25 Overall, the plan policies provide an appropriate basis upon which to safeguard and enhance the natural and built environments.

10 Strong Connections – Climate Change, Renewable Energy, Transport, Minerals and Waste

Climate change and renewable energy

- 10.1 Policy SP16 provides a framework for development proposals that respond to and minimise the causes and effects of climate change. To aid interpretation, **MAC 076** correctly deletes ‘or’ after criterion d, thereby confirming that all policy criteria apply.
- 10.2 As with other topics within the RLDP, Policy SP16 provides an appropriate link with the accompanying climate change policies and therefore does not unnecessarily repeat other parts of the plan. Where there is duplication with national policy, the Council have proposed changes to the relevant policies. For example, since Policy CCH5 repeats national planning policy in respect of development proposals within flood risk areas, there is no justification for retaining it in the plan. **MAC 081** consequently removes Policy CCH5 from the plan.
- 10.3 The Carmarthenshire Renewable and Low Carbon Energy Assessment (RLCEA) [CSD27] is a high-level assessment of the potential for different renewable and low and zero carbon energy types during the Plan period. The energy generation figures set out within the RLCEA are ambitious yet evidenced. Whilst the RLCEA predates the final publication of FW, it has considered that document’s consultation draft policies on wind and energy. Indeed, the potential capacities from wind and solar energies provide the greatest contributions during the Plan period, based on a methodical approach towards assessing different renewable energy sources. To that end, FW identifies pre-assessed areas for wind energy, including one within Carmarthenshire, where the likely landscape impacts have been modelled and a presumption in favour of large-scale wind energy development will be assessed through FW Policies 17 and 18. Its methodology accords with the WG Planning for Renewable and Low Carbon Energy – A Toolkit for Planners (2015).
- 10.4 The RLCEA identifies and recommends three LSAs where solar energy developments of 5MW or more installed capacity will be supported.
- 10.5 RLDP Policy CCH1 supports solar developments of 5MW or more within the LSAs subject to meeting several policy criteria. Whilst there are no references within the policy to BMVAL and high carbon soils, the RLCEA site selection methodology confirms that these land use constraints have been factored into the assessment. Given that two of the three LSAs have been assessed as having ‘high’ landscape sensitivity the policy support is, crucially, subject to there being no unacceptable impact on visual amenity or landscape character. The policy does not name the three LSAs, which **MAC 077** correctly rectifies along with a cross-reference to the Proposals Map and confirmation that proposals should be assessed against all three policy criteria. A further related change to the reasoned justification clarifies that solar developments above 10MW within LSAs will be determined through FW policy.
- 10.6 Policy CCH1 also supports wind energy proposals of 10MW and above within the FW pre-assessed area, subject to meeting policy criteria. However, FW is clear that

in such areas there is a presumption in favour of large-scale onshore wind energy development subject to the criteria in Policy 18. To remedy this inconsistency, **MAC 077** removes all references to large scale wind farms from Policy CCH1, which now focusses exclusively on solar schemes within LSAs.

- 10.7 Outside the pre-assessed area and LSAs, Policy CCH2 supports renewable and low carbon energy schemes where they satisfy policy criteria. The reference to there being no unreasonable impacts on residential amenity in criterion e is not consistent with the other criteria which refer to unacceptable impacts. In addition, criterion b refers to ‘areas designated for their landscape value’ which no longer applies following changes to Policy BHE2. To ensure consistency **MAC 078** rectifies these conflicts.
- 10.8 Whilst Policy CCH2 is not explicit on BMVAL and high carbon soils, **MAC 078** provides the necessary references in the reasoned justification, ensuring that renewable energy schemes on such land should only happen where there is an overriding need. A further change to the reasoned justification clarifies that Policies CCH1 and CCH2 only apply to applications falling below the 10MW threshold. Together, the changes clarify the local evidence-based approach and its relationship with FW.
- 10.9 FW Policy 16 names Llanelli as a district heat network priority area, within which planning authorities should identify opportunities for District Heat Networks and plan positively for their implementation. Accordingly, the RLCEA identifies four potential schemes across the urban areas, including two within Llanelli, which require further analysis to determine financial viability. The Plan’s support for such schemes is provided in Policies CCH2 and CCH6.
- 10.10 Policy CCH6 encourages the incorporation of renewable and low carbon energy technologies in new developments. Building on the RLCEA recommendations, **MAC 082** amends the policy, and its reasoned justification to explain that commercial developments of 10,000 sqm or above require an Energy Assessment to determine the feasibility of incorporating renewable and low carbon energies into schemes. The provisions take forward the minimum requirements in FW Policy 16. These changes together with additional wording in the reasoned justification, confirm that a flexible approach will be applied to the local policy, in recognition of site-specific circumstances.
- 10.11 Policy CCH7 supports proposals which seek the creation of woodland, forests, tree belts and corridors. This provides a local policy basis in support of national targets for increasing woodland cover which in turn can assist with abating carbon emissions. There is also scope for tree planting along watercourses to reduce nutrient run-off and soil erosion, thereby supporting the Council’s nutrient mitigation strategy. Revisions to the policy are necessary to ensure it differs from Policy PSD4, which concerns the effects of development proposals on existing trees, woodlands and hedgerows. **MAC 048** clarifies that the policy refers to development proposals, and removes reference to protection, since that is already covered in Policy PSD4. Further changes to Policy CCH7 contained in **MAC 083** include considerations in relation to flood risk management and ecosystems along with an explanation of these matters in the reasoned justification.

- 10.12 Changes have also been made to Policy PSD4 which clarify that the policy applies to new developments, whilst the reasoned justification explains that proposals may require new and compensatory tree planting. These changes ensure that both policies are justified and do not duplicate each other.

Transport and accessibility

- 10.13 Policy SP17 provides the framework in support of delivering an accessible integrated and sustainable transport system. The policy criteria are wide-ranging and set out statements of ambition and support which link with several policies throughout the RLDP. Amongst other things, Policy SP17 recognises that reinforcing the function and role of settlements contributes to the delivery of a sustainable transport system. To this end, **MAC 084** amends criterion d to provide a cross-reference to Policy SP3, which is consistent with references to the settlement framework elsewhere in the Plan.
- 10.14 A separate criterion in Policy SP17 provides for ultra-low emission vehicles (ULEV) charging points in new developments. This links with Policy CCH3, which sets out the plan requirements for ULEV charging units in residential and non-residential developments. However, in requiring ULEV charging units, Policy CCH3 goes beyond the provisions of national policy, which refers to charging points. The Council’s evidence in its FVR Update [CSD32] makes an allowance of £550 per dwelling for ULEV charging points. Since there is no local justification requiring charging units to be installed by a developer, Policy CCH3 should refer to charging points. **MAC 079** makes the required change.
- 10.15 The FVR assumptions are based on typical costs being added to the Building Cost Information Service average prices. The FVR recognises there is a price range for charging points and the study’s assumptions are purposefully set at a high level to capture broad viability for the wide range of development anticipated to come forward. We are satisfied that the evidence provides an appropriate basis for undertaking a high-level assessment and justifies the approach taken in Policy CCH3.
- 10.16 Policy TRA2 supports proposals which enhance walking and cycling access. Amongst other things, the policy provides a basis for seeking secure and convenient cycle parking within developments. The second part of the policy refers to the impacts on public rights of way and existing active travel routes. **MAC 085** makes several necessary clarifications within the policy. It now confirms that the policy applies to development proposals, which is a clearer basis for applying the policy. A further change requires development proposals which have a significant adverse impact on public rights of way or existing active travel routes to provide alternative routes through delivery of the Cycling Strategy and Active Travel Network Map. This change replaces the policy reference to the Council’s Active Travel Plan and is more precise in its expectations and evidence source. A minor addition to the reasoned justification cross-references the existing plan appendix listing active travel routes. With these changes, Policy TRA2 provides an appropriate local basis for taking forward national policy and legislation on active travel measures.
- 10.17 Whilst national policy and guidance in TAN 18 Transport provide a steer for setting parking standards, it is unclear how car parking provision will be managed in the

RLDP. Without a local policy basis, it would be harder to seek and justify any standards. **MAC 085** therefore incorporates an additional criterion within Policy TRA5 which supports development proposals that are in accordance with the Council's parking standards. Related changes to the policy's reasoned justification explain the basis for the standards and that they will be adopted as SPG and applied flexibly. This approach is consistent with national policy.

- 10.18 Overall, and subject to MACs, the policy framework for transport and accessibility is consistent with national policy and is supported.

Mineral resources

- 10.19 The Regional Technical Statement for the North Wales and South Wales Regional Aggregates Working Parties – 2nd review (September 2020) [RPG8] sets out the regional position on minerals planning. The Statement identifies apportionment figures for Carmarthenshire of 27.556 million tonnes for crushed rock aggregates up to 2041 and 0.058 million tonnes of sand and gravel up to 2038.
- 10.20 The statement of sub-regional collaboration for the Swansea City sub-region [RPG10] confirms agreement between Carmarthenshire, Neath Port Talbot and Swansea Councils to accept their apportionments of crushed rock. The Council's Minerals Topic Paper [CSD84] explains there are sufficient permitted reserves of crushed rock at existing sites in the authority area to meet its apportionment over the Plan period, whilst also maintaining a minimum 10-year landbank as required by Minerals Technical Advice Note (Wales) 1: Aggregates, March 2004 (MTAN1). Consequently, no new RLDP allocations for crushed rock are necessary in Carmarthenshire.
- 10.21 The Council forms part of a separate sub-region for land won sand and gravel resources, being combined with Pembrokeshire and Ceredigion County Councils and Pembrokeshire Coast National Park Authority. One site in Carmarthenshire contributes to supply. RTS2 confirms a landbank deficit of sand and gravel across the sub-region, with new extraction sites required. The South West Wales sub-region [RPG11] explains that, to satisfy RTS2, two agreed areas of search for sand and gravel have been identified across the region. One of these areas partly falls within Carmarthenshire and is identified under Policy SP18 and annotated on the Proposals Map. The sub-region authorities have yet to finalise apportionment of sand and gravel resources. However, the approach towards identifying search areas allows for future exploration and production, subject to compliance with relevant minerals policies.
- 10.22 This evidence has informed the RLDP approach towards sustainable management of mineral resources. Policy SP18 provides an appropriate high-level framework which covers the supply, re-use, and safeguarding of minerals resources and infrastructure, along with the use of buffer zones and restoration schemes. Policy MR1 supports applications for mineral extraction where there is a proven need, and where they would not result in any significant adverse impacts on various matters having regard to the policy criteria. **MAC 086** and **MAC 087** are necessary to confirm that all the criteria within both policies apply.
- 10.23 Policy MR2 designates buffer zones around all sites with extant planning permission for mineral working. Whilst the buffer zones are shown on the Proposals

Map, the sites are not named in the policy. To ensure effective application of Policy MR2 in accordance with national policy, **MAC 088** identifies active, inactive and dormant mineral sites with buffer zones and the relevant extracted mineral. The list of sites in Policy MR2 is cross referenced with a more detailed table in Appendix 4 which lists the status of and type of mineral extracted from each site. **MAC 121** adds dates for the review of old minerals permissions to the table. These changes give clarity to the policy and aid interpretation.

- 10.24 To avoid permanently sterilising mineral resources, Policy MR3 identifies mineral safeguarding areas and sets out criteria for development proposals. Whilst the policy refers to safeguarded areas identified on the Proposals Map, the relevant details are missing. **MACM/MSAs** correctly seeks to rectify this omission by ensuring that these areas are annotated on the Proposals Map. To provide consistency with national policy, **MAC 089** ensures that Policy MR3 and its reasoned justification refer to safeguarding minerals related infrastructure alongside the aggregate.
- 10.25 Subject to **MACs**, we are satisfied that the RLDP minerals framework is justified and the approach towards land bank requirements satisfies RTS2. Subject to the changes as set out above, the policies also comply with PPW and MTAN 1.

Sustainable waste management

- 10.26 Policy SP19 sets out the plan framework for the sustainable management of waste. The first part of the policy lists criteria in support of appropriate proposals for waste management facilities and the sustainable management of waste in all new development. Whilst the RLDP does not allocate waste sites, the accompanying Waste Topic Paper [CSD85 and CSD86] identifies use class B2 employment allocations and safeguarded sites that could be appropriate for in-building waste facilities. It adds that the process is largely market driven, and the suitability of sites will be assessed against policy criteria. To this end, the second part of Policy SP19 sets out requirements for waste development proposals. **MAC 090** correctly confirms that both criteria, addressing environment-related considerations and compatibility with neighbouring uses, must be satisfied. It also cross references Policies EME1 and EME3 in the reasoned justification, regarding potentially suitable employment sites for in-building waste facilities.
- 10.27 New development proposals must provide for the sustainable management of waste through Policy WM1. The accompanying criteria in the reasoned justification provides a local basis which is supportive of the targets in Towards Zero Waste, the WG’s national strategy [NPG67]. The Waste Planning Monitoring Report 2022/23 Mid and South West Wales Region [RPG7] identifies sufficient capacity in the region’s landfill sites based on monitoring triggers in TAN 21 – Waste (2014). The County’s remaining landfill site at Nantycaws has capacity but is not currently operational. Whilst there is no current requirement for additional landfill sites locally or regionally, Policy WM2, as amended by **MAC 091**, sets out criteria to consider new sites.
- 10.28 Policy PSD5 requires development proposals to demonstrate how waste generation has been minimised and managed to keep resources in use for as long as possible. At a local level, Policy PSD5 requires a natural materials management plan to be submitted with proposals to demonstrate policy compliance. This includes

consideration of design choices and construction practices, amongst other things. To ensure consistency with national policy, **MAC 050** amends the policy reference to a ‘natural material management plan’ and confirms that all policy criteria apply. It is unclear where and how the management plan would apply to development proposals. Consequent changes to the reasoned justification explain that a management plan should be sought for all development proposals, whilst its content shall be proportionate to the scale of each proposal. With these changes, Policy PSD5 supports PPW by taking actions to move towards a more circular economy in Wales.

- 10.29 Policy WM3 addresses proposals involving the deposit of imported inert waste materials to improve low-grade agricultural land. Whilst the policy aims are reasonable, **MAC 092** is necessary to clarify that all criteria should be met.

Conclusions

- 10.30 Overall, we are satisfied that the policies and proposals in relation to waste management are based on robust and credible evidence and, subject to **MAC 090**, **MAC 050** and **MAC 092**, are consistent with national policy.

11. Plan Monitoring and Review

- 11.1 Alongside a statement on how the Council envisage the Plan will be implemented, section 12 of the LDP contains a monitoring framework which details the indicators that will be used to monitor policies and proposals. The indicators are grouped together under the strategic policies. Each indicator has a corresponding target and trigger point which will enable annual monitoring. As required by the DPM, key indicators on housing completions, employment land take-up, viability and development in flood risk zones have also been included.
- 11.2 The Plan identifies colour-coded actions which, depending on the outcome of individual indicators, could be applied to make changes or take alternative courses of action. They include officer and member training, preparing planning guidance, undertaking further research, reviewing policy and ultimately a Plan review.
- 11.3 Revisions to the indicators are necessary to provide clarity on what is being monitored. They include changes to the wording of targets and trigger points for indicators on retail and town centres (**MAC 093**) housing delivery (**MAC 095**, **MAC 096** and **MAC 097**), strategic sites (**MAC 098** and **MAC 099**) employment (**MAC 100** and **MAC 101**) gypsy and traveller accommodation (**MAC 103**, **MAC 104** and **MAC 105**), GBI provision (**MAC 106**), the delivery of solar schemes within LSAs (**MAC 111**) implementation of identified road schemes (**MAC 115**), and mineral resources (**MAC 116**, **MAC 117** and **MAC 118**). These changes would be consistent with Plan targets for delivering housing, employment and strategic sites. Further changes to the monitoring of town centres would clarify that commercial properties, and not just retail units, are included, alongside reference to the Council’s audit surveys.
- 11.4 New indicators are proposed to monitor certain policies including the loss of A1 retail uses within town centres (**MAC 094**), Welsh language (**MAC 102**), the loss of community facilities (**MAC 107**), public open space provision (**MAC 108**), housing density (**MAC 109**) biodiversity enhancement (**MAC 110**) and to monitor the delivery of SPG and Action Plan in relation to Marine SACs (**MAC 112**, **MAC 113** and **MAC**

114). These additions are necessary to ensure that relevant policy aims are monitored effectively.

- 11.5 In addition, The ISA sets out a series of indicators intended to monitor the significant environmental effects of the RLDP and are specifically designed to identify any unforeseen adverse effects and enable appropriate remedial action to be taken. The monitoring framework is appropriately set out under the 15 sustainability objectives contained in the SA [CSD16, Chapter 8] and identifies a series of potential contextual indicators each of which will, individually or collectively, enable the Council to assess whether the Plan is being delivered in the manner intended, and if not, signal the need for remedial action.

Conclusions

- 11.6 Overall, we are content that the provisions made for the monitoring of the RLDP, as amended by the MACs, are consistent with national planning policy and will provide a robust and sound basis on which to assess the performance of the Plan.

12 Overall Conclusions

- 12.1 We conclude that, with the binding recommended changes identified in this report and set out in Appendices A, the RLDP satisfies the requirements of section 64(5) of the 2004 Act and meets the tests of soundness in the DPM. In reaching this conclusion, we have taken into account the ways of working set out at section 5 of the WBFG Act. The RLDP as modified will guide the development and use of land in a way that contributes towards improving the economic, social, environmental and cultural well-being of Wales and complies with the WBFG Act.
- 12.2 In accordance with the requirements of Section 12(4) of the Planning (Wales) Act 2015, the RLDP, once adopted, will remain operational until **31 March 2033**.

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Inspectors