
Appendix 9: Key themes to emerge as part of the consultation into the 2nd Deposit Revised LDP

Housing supply and the housing growth requirement

A number of representations were received objecting to the proposed level of growth outlined within the Revised LDP, and seeking a higher level of growth similar to that outlined within the current LDP. Many of these representations were a precursor to support the inclusion of non-allocated land within the plan.

Conversely, representations were also received which sought to reduce the levels of growth set out within the plan. These representations stated that a more realistic target should follow Welsh Government's projections. In their view this would reduce the levels of migration which dilute the Welsh language and unique culture of the County's settlements, and reduce the stresses faced within the health and social care system.

The level of growth set out within the Revised LDP seeks to balance the needs of both rural and urban communities, reflecting an ambitious yet realistic annual build rate, and looks to deliver the Council's Corporate Strategy, regeneration and job creation objectives. Further work will be undertaken in relation to the housing growth requirement and housing supply, with further population and household demographic evidence informing and supporting the Council's approach at the examination.

Housing Distribution

Representations were received relating to the distribution of housing growth and the use of 'Clusters' as part of the settlement hierarchy. Whilst no fundamental objections were received, the responses sought to acknowledge the need to direct the majority of development to sustainable locations within the County. Responses to the Plan include queries relating to the role and growth of rural settlements within the strategy.

Representations were also received regarding Policy HOM3, which seeks to provide housing proposals in settlements defined as rural villages. The representations sought to increase the 10% development cap to provide more housing in rural settlements in order to sustain the social, cultural and economic needs of those villages. Secondly, representations were received to support the development of sites in conjunction with representations received on Policy SD1- Development Limits.

The Council will, in responding to the representations received, undertake further work relating to Tier 4 of the settlement hierarchy and evidence the significant role these villages play in supporting the social, economic and linguistic fabric of their communities. In addition, the housing trajectory and the associated evidence base will continue to highlight the location and rate of housing delivery within the County.

Retail

The LDP has a role in supporting the Town centres and retail sector in Carmarthenshire. The retail sector has seen significant changes and challenges in recent years and the LDP seeks to provide a framework to support Carmarthenshire's retail sector to adapt and thrive so that it can continue to meet the needs of the County's communities. To this end, an updated Retail Study for Carmarthenshire was published in January 2023 to support the production of

the LDP and to provide an updated position in terms of retail provision, need and the most recent shopping preferences and trends in the County.

Development Viability and Affordable Housing

Whilst a limited number of responses were received relating to the Affordable Housing policies, the Council recognises its importance in meeting its strategic aims of maximising the development of affordable housing.

Further evidential work has been / and will be undertaken on Development viability which informs the affordable housing targets. This includes a Stakeholder Viability Workshop in September 2023 which has been prepared to inform the viability work and to achieve consensus on key issues and viability inputs.

Gypsy and Travellers

The Council recognises its requirement to provide an up to date Gypsy and Traveller accommodation needs assessment study for the plan period which was undertaken prior to the Deposit Consultation. This needs to be ratified by WG prior to the examination of the Plan.

The Deposit LDP has recognised the allocation of a new Gypsy and Traveller site within Llanelli to meet the housing need, in addition to the allocation of the extension to the Penybryn Traveller site in Bynea.

Site Specific Representations

A number of representations have been received relating to the allocation of housing sites within the Plan. Whilst a number of the representations are in support of the sites included in the Plan (over 100 representations), a greater number are objections to their inclusion within the Plan (over 400 representations), in particular to the non-delivery of current allocated sites. In addition, there have been approximately 30 representations in support of small sites (< 5 units) within development limits, and over 120 objections to such sites.

The Council will undertake further work where necessary to support the inclusion of the allocated sites, including the use of statements of common ground with developers on the larger allocated sites to re-affirm their inclusion, whilst on-going discussions are being undertaken with developers regarding the delivery mechanisms on smaller sites.

Welsh Language and Culture

Many of the comments received with regards the Welsh language form part of those wider considerations in regards the level and spatial distribution of growth as set out within the Plan, along with the strategic direction of travel.

There have also been a range of views expressed in terms of the Council's proposed policy approach, particularly in terms of the Revised LDP considering that Carmarthenshire in its entirety is considered to be an area of linguistic sensitivity.

It should be noted that in responding to such matters the Council has already prepared evidence, notably in the form of a Welsh Language Impact Assessment (December 2019). Moving forward, further evidence has been prepared. This included building upon the Welsh Language Impact Assessment, and undertaking further analysis work in terms of population and household projections/ migration data and also an update to the Two County Economic Study for Carmarthenshire and Pembrokeshire in 2021. The update to the Economic Study further considered the links between the Welsh language and the economy in the two Counties.

Caeau Mynydd Mawr and the Burry Inlet

There have been no fundamental concerns raised in regard to these matters. They are fundamentally important policy areas as they seek to balance environmental, infrastructural and developmental interests at two strategically important locations within the County - namely the Cross Hands area and the Llanelli/Burry Port area.

The policies are Policy NE4 'Development within the Caeau Mynydd Mawr SPG Area' and Policy INF4 'Llanelli Wastewater Treatment Surface Water Disposal' respectively. The Council will be aware that consultation has already been undertaken in regards Draft Supplementary Planning Guidance (SPG) prepared to support the implementation of the above policies. In this regard, the Council were provided with responses received to the SPG consultation and recommendations in relation thereto. Again, there were no fundamental concerns raised.

Renewable Energy

Responses have been received seeking changes to the wording of the policies, including changes to protect the landscape. The Welsh Government has also raised a category C objection with recommendation for changes to the policies and evidence base.

Climate Change

Whilst not the subject of a significant level of representation, the Revised LDP will continue to reflect the declaration both nationally and locally of the climate emergency and will further consolidate links to the Council's Net Zero Carbon agenda.

Nature Conservation & Landscape Character

In regards environmental matters, it is not considered that there are any fundamental issues. The Council has undertaken engagement with key consultees – notably Natural Resources Wales and Dwr Cymru Welsh Water. There are no fundamental concerns raised by these key consultees in regards the strategic direction of the Plan.

Representations were received in respect of policy BHE2 Landscape Character. The majority of representations reflected concerns over the removal of Special Landscape Areas as identified within the current adopted LDP and the replacement with a landscape character assessment to be developed through SPG. It should be noted a significant number of these representations were prompted by the proposal for electricity pylons through the Tywi Valley. It is anticipated that the SPG on Landscape Character will be adopted concurrent with the Revised LDP.

Flood Risk

The Council has prepared evidence with regards this matter, with a Stage 1 SFCA (Strategic Flood Consequences Assessment) and a Stage 1b SFCA undertaken and published as part of the first Deposit Plan. A further stage 1 SFCA was prepared for the South West Wales region in response to the requirements of the Minister for Climate Change and the content of the emerging TAN15, as well as a SFCA for the second Deposit sites. A subsequent FCA has been prepared for the allocated proposed Gypsy Traveller Site in response to representations made by Natural Resources Wales.

Infrastructure

There are no fundamental issues in respect of infrastructure and the Revised LDP. Of the representations received none raise serious issues of concern. However, there are some minor concerns with some areas from a highway's perspective. The Council will look to acquire further evidence in regard to Cross Hands and the highways infrastructure needed to facilitate any new development in the area as the Plan progresses towards adoption. Particular reference will be had to the upgrade to the A48 'diamond' junction along with the recent completion of the Cross Hands Economic Link Road (ELR). This will alleviate pressure at the A476 'six-ways' junction in Gorslas as well as potential pressure caused by developments at the new Cross Hands East Employment site. Welsh Government have no objections to make.

Employment

Evidencing the deliverability of employment allocations, and ensuring that there is not an oversupply are key issues set out within Planning Policy Wales (PPW Ed.11) and Development Plans Manual (DPM Ed.3). This has seen a streamlining of our employment allocations for the Revised LDP – a reduction from 113ha in the adopted LDP to under 72ha in the Revised Plan.

The Welsh Government have not raised an issue with the current level of employment land allocated in the Revised Plan, however in their representation to the 2nd Deposit Plan, they have commented upon Growth Levels in terms of the relationship between Homes and Jobs. They conclude that on balance they do not have significant concerns with the housing requirement and the level of jobs proposed (subject to the clarifications in their representation).

Minerals

The only key issue of note relates to the apportionment of reserves, as set out in the Regional Technical Statement 2nd Review (RTS2). Such issues are being dealt with through the preparation of Statements of Common Ground between the constituent local authorities. One notable representation on this matter was received from the Welsh Government. The WG acknowledged that a Statement of Sub-regional Collaboration (SSRC) has been produced in the Swansea City Sub-Region and another is being prepared in West Wales with Carmarthenshire working with the adjoining sub-region to help satisfy the requirements of RTS2 in respect of sand and gravel provision. The WG added that both SSRCs should be included as part of the evidence base when the plan is submitted for examination.

The SSRC for the Swansea City Sub-Region has been finalised and will be submitted for examination as part of the evidence base. In terms of the SSRC for West Wales, discussions are still ongoing and a Position Statement detailing the current status of the evolving SSRC has been produced and will be submitted as part of the evidence base for examination.

Phosphates

Phosphorous is a nutrient that occurs naturally in low levels and is necessary for the healthy functioning of rivers. It is released slowly at low levels from natural sources, from natural bankside erosion for example. However, in high levels it is the most harmful nutrient in freshwater and can lead to eutrophication - where an excess of nutrients causes a dense growth of plant life and subsequent death of animal life due to lack of oxygen.

In January 2021 Natural Resources Wales (NRW) published new targets to reduce river phosphate levels in protected riverine special areas of conservation (SAC) across Wales. In relation to Carmarthenshire this affected catchments associated with the Afon Tywi, Teifi, Cleddau and Wye.

The review followed evidence from the Joint Nature Conservation Committee that warmer and drier weather, predicted because of climate change, could reduce river flows during the summer and therefore increase phosphate concentrations. It is also based on new evidence about the damaging effects of phosphates to water ecosystems and species. The impacts associated with the NRW guidance is wide ranging but also includes direct challenges to the progress of LDPs to adoption. In responding to this, Carmarthenshire has adopted a proactive and leading role across Wales including in responding through its LDP preparation. This has included the development of Actions Plans for nutrient management, Nutrient Management Strategy, Topic Paper, Statement of Common Ground with partners, central membership of the Nutrient Management Boards and a positive response through the HRA process. All of which is supplemented by the tools developed to support developers such as the nutrient calculator and mitigation guidance.