CARMARTHENSHIRE REVISED LOCAL DEVELOPMENT PLAN (2018-2033) EXAMINATION

INSPECTORS INITIAL QUESTIONS

We refer to the above.

We have now had the opportunity to review the Revised Local Development Plan (RLDP), submitted documents, evidence base and representations in detail. In doing so, we have identified several areas that require either further clarification and / or information from the Council. These matters concern the soundness of the RLDP, and the Council should therefore respond in a considered manner. If any of the information we seek has already been set out in the submitted documents, please signpost these rather than duplicate the information.

Procedural Matters

During the course of the hearing sessions, it may be necessary for the parties to discuss and agree changes to the structure and / or content of the RLDP. In order to ensure that this process is undertaken in an efficient and effective manner, we would be grateful if the Council could confirm that an officer, with delegated authority to make changes to the RLDP and agree the preparation of additional evidence, will be present at all hearing sessions.

Future Wales – The National Plan 2040

In light of the requirements of Policy 19 of Future Wales, which provides a framework for Strategic Policies in Regional Planning, it would be of assistance if the Council could confirm that the policies and allocations contained in the RLDP, specifically in relation to housing requirement and supply, would not have an adverse impact on the future formulation or delivery of the Strategic Development Plan for South West Wales.

Planning Policy Wales, Edition 12 (February 2024)

A revised version of Planning Policy Wales (PPW) was issued by the Welsh Government in February 2024. The revisions to PPW are contained primarily in chapter 6 and relate to net benefit for biodiversity and ecosystems resilience (incorporating changes to strengthen policy on sites of special scientific interest, trees and woodlands and green infrastructure).

To assist the examination, we would be grateful if you could review the contents of the revised chapter 6 and provide a response which explains how the requirements of PPW have been addressed or any changes that maybe required to the submitted RLDP.

Flood Maps for Planning

The latest updates to the Flood Maps for Planning (FMfP) were issued by Natural Resources Wales in May 2024. This update, together with earlier iterations, include a number of alterations to flood zones 2 and 3 across Wales and mapping improvements to the defended zones contained in Technical Advice Note 15 (TAN 15).

In light of the updated information, we would be grateful if the Council could review the policies and site allocations in the RLDP and provide response which identifies any policies or site allocations which conflict with the requirements of TAN 15 or the FMfP, explain how these matters have or will be addressed and if amendments will be required to the submitted RLDP.

Contents of the Plan

Whilst we note that a significant amount of work has been undertaken to formulate the contents of the RLDP, there are nevertheless a number of areas of the Plan which need further clarification and / or revision. These relate specifically to:

- The structure (layout and numbering) of policies in the Plan, which vary significantly throughout the document. To ensure the clarity and consistency, it is requested that the Council amend Policies HOM3, HOM7, HOM8, AHOM1, SP7, EME1, VE1, VE2, VE3, PSD3, PSD4, PSD5, RD3, NE1, NE2, NE3, NE6, NE7, BHE1, CCH1, CCH2, CCH3, SP17, MR1, MR3, SP19 and WM2 to reflect the predominant structure of policies which is exemplified by Policies SP1, PSD1 and PSD12.
- Policies SP1, SP4, SP13, SP17, HOM2, EME4 and GTP1 which should be amended to make reference to Policy SP3, and
- Policies SP10, SG2, MR1, INF3, NE4, CCH4, CCH5 and PSD8 should be amended to remove the reference to the 'Council / Local Authority', and
- For completeness, it would be helpful if the Council could provide representation numbers for the comments made by Natural Resources Wales in their representations in respect of Policies SP3, PSD3, INF5 and NE3, and provide a response to the issues raised.

Please note that these observations are based on our reading of the submitted LDP and supporting documents and that further revisions to the Plan may be required during the Examination.

The Council should submit this further information and a list of proposed changes to the RLDP as soon as it is available, and no later than 6 September 2024.

Nicola Gulley and Ian Stevens
INSPECTORS
31/07/2024