

# Preferred Strategy

## Summary of Representations & Response / Recommendations

Section 1. Introduction

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### Section 1. Introduction

#### Section 1. Introduction

##### Representation(s)

##### Nature

**1994** National Grid Company plc. (Lucy Bartley) [2586] **Comment**

##### Summary:

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

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##### Response / Recommendation

**Comment noted.**

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#### Paragraph 1.1

##### Representation(s)

##### Nature

**675** Lynda James [3039] **Comment**

##### Summary:

The Letitia Cornwallis Trust, established 1790's located of the A40 at Llanwrda would like to be considered for inclusion as a candidate site for using the 3.5 acres to create a community hub. This would include restoration of the Georgian Alms House, renovation of the Georgian School and associated buildings and consider using some of the land at the rear of the property to build (yet to be refined in detail) units, homes, affordable, self builds etc. whilst maintaining the large recreational area and the existing quality play equipment.

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##### Response / Recommendation

**Noted, site specific matters are considered as part of the candidate site process.**

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##### Representation(s)

##### Nature

**810** Natural Resources Wales (Miss Sharon Luke) [3253] **Support**

##### Summary:

NRW welcome the opportunity to comment on the Draft Pre-Deposit Preferred Strategy.

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##### Response / Recommendation

**Comments noted / support welcomed. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard.**

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### ***Section 3. What is in the Preferred Strategy?***

#### **Paragraph 3.1**

##### ***Representation(s)***

##### ***Nature***

**677** Lynda James [3039]

**Support**

##### ***Summary:***

The respondent requests the site be considered for inclusion. Reference should be made to representation 675

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##### ***Response / Recommendation***

**Noted, site specific matters are considered as part of the candidate site process**

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## Section 4. Influences on the Plan

### Section 4. Influences on the Plan

<i>Representation(s)</i>	<i>Nature</i>
<b>1779</b> Mineral Products Association Wales (Mr Nick Horsley) [3778]	<b>Object</b>

**Summary:**

We believe the Regional Technical Statement and the Welsh Marine Plan should be added to the list of documents referred to

**Change To Plan Sought:**

Amend the text to include the Welsh Marine Plan & the Regional Technical Statement.

**Response / Recommendation**

**Noted. The comments by the respondent in respect of 'Section 4. Influences on the Plan' are duly noted. Any amendments to wording will be considered as part of the preparation of the Deposit LDP.**

### Paragraph 4.5

<i>Representation(s)</i>	<i>Nature</i>
<b>1759</b> City & County of Swansea (Mr Tom Evans) [3761]	<b>Comment</b>

**Summary:**

The Swansea LDP is at an advanced stage and adoption of the plan is due to be considered at Council on 28th February 2019. The cross boundary implications of the following policies will therefore need to be taken into account in the deposit plan and reflected appropriately in the SA and HRA process.

- \* Strategic Site Allocation SD A - South OF Glanfrwd Road, Pontarddulais and associated developer requirements (Policy SDH, Appendix 5, Appendix 3, Infrastructure Development Plan)
- \* Strategic Site Allocation SD H and associated development requirements for provision of park and ride at Gowerton Station
- \* Non-Strategic Site allocations under Policy H1 at Gorseinon and Loughor - impact on water quality and highways network. (see H1.30/H1.19/H1.25/H1.32)
- \* RP 4 - Water Quality
- \* EU1 - Renewable and Low Carbon Energy Developments - See Solar Search Areas on Proposals Map - located to east of Pontarddulais. See also Swansea's Renewable Energy Assessment May 2018 (ED072)
- \* ER 5: Special Landscape Areas -(See Proposals Map)
- \* ER 7 - Undeveloped Coast - protection of the seascape from Swansea's undeveloped coast
- \* HC 3: Welsh Language Sensitive Area (See Proposals Maps)
- \* RP12: Sand and Gravel Resources
- \* RC5 District Centres: See Pontarddulais, Gorseinon, Loughor and Gowerton District Shopping Centres

**Response / Recommendation**

**Comments noted. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard.**

**Representation(s)**

**Nature**

**1749** City & County of Swansea (Mr Tom Evans) [3761]

**Support**

*Summary:*

The commitment to work with neighbouring LPAs (at section 4.5) is welcomed. We are keen to work collaboratively over the plan preparation process to ensure that all relevant local trans-boundary issues and in-combination effects are addressed and that a sound basis is laid for the future preparation of any Strategic Development Plan for our region. The key topic areas where cross-boundary/regional working is required are considered to be:

- a) Transport, air quality
- b) Spatial distribution of growth/candidate site selection.
- c) Water Quality/Burry Inlet and Loughor Estuary CBEEMs
- d) Local transboundary effects in SA Scoping Report
- e) Swansea LDP Policies, Designations, Allocations with Cross Boundary implications.

The comments and suggestions we have provided are surrounding these themes and relate to the relevant sections of the Preferred Strategy, SA Report, HRA Report and relevant Topic Papers

**Response / Recommendation**

**Support welcomed. The Council looks forward to continuing its constructive dialogue with the respondent along as the Plan making process proceeds towards the Deposit LDP.**

**Paragraph 4.6**

**Representation(s)**

**Nature**

**678** Lynda James [3039]

**Support**

*Summary:*

The "vision" of Letitia Cornwallis Trust includes maintenance of the recreational area and perhaps use of some of the assets to provide gym or changing room facilities. There have also been discussions with Calon Cymru which include the possibility of a cycle link between Llanwrda and Llansadwrn.

**Response / Recommendation**

**Noted, site specific matters are considered as part of the candidate site process.**

## Section 5. Carmarthenshire - Strategic Context

### Paragraph 5.2

**Representation(s)**

**Nature**

701 Mr Gerwyn Thomas [3248]

Comment

*Summary:*

it is vital that the distinctive character of our local communities are maintained and are not assimilated into neighboring communities, otherwise there is a very real danger of community identity being irreversibly lost with social cohesion and "community" itself being destroyed. It's the feeling of belonging to and being part of a particular community that is the key to a healthy community and to risk destroying that by merging communities is unnecessary and irresponsible. Reference is made to candidate site submission in the Llanelli / Bryn area

**Response / Recommendation**

**Noted. The Revised LDP will be prepared in accordance with the provisions of PPW Ed. 10 and the councils Site Selection methodology. The reference to the candidate sites by the respondent is not a matter for consideration within the Draft preferred Strategy. Rather this will be considered as part of the preparation of the Deposit Plan.**

### Paragraph 5.3

**Representation(s)**

**Nature**

534 Mr Owen Williams [3158]

Object

*Summary:*

- Growth estimates for the County are based upon the City-Region Deal without consideration of any critical sources. Any plan, no matter what, must be based on the EVIDENCE whether it is critical or not. Consideration must be given to research suggesting city deals may not result in the gains promoted by the deal-makers
- how will city deal success be measured/evaluated? Should be some measuring mechanism to understand quickly whether the LDP is based on flawed assumptions

*Change To Plan Sought:*

- Conduct critical assessment of the effects of the City-Region Deal and adjust the LDP accordingly
- Revise down economic and population growth estimates to ensure a deliverable and achievable plan
- Create mechanisms and measures to understand and track progress on criteria concerning the success/failure of the City-Region Deal in Carmarthenshire

**Response / Recommendation**

**Noted. It is accepted that the Preferred Strategy incorporates and recognises the benefits and contributions that may accrue from the City Deal. However, it is not the sole basis for the strategic approach or growth requirements set out within the Plan. Indeed in terms of growth the potential from the City Deal whilst an informant is not the only driver for growth within Carmarthenshire. For example in terms of job creation the Councils own Transformation Strategy. This is also reflected in the selection of the strategic option which represents a hybrid approach understanding the varied nature of the County.**

The respondent concerns in relation to the City Deal failing to deliver the growth anticipated is noted. In this respect the Deposit LDP will contain a monitoring framework. This will include a series of measures and triggers to assess the success or otherwise of the Plan in delivering its policies. We will continue to have constructive dialogue with partners including those within the City as appropriate to ensure the Plan remains up to date.

In addition as the Plan progresses through its preparatory stages it will respond to changes in circumstances as appropriate.

## Paragraph 5.6

### *Representation(s)*

### *Nature*

679 Lynda James [3039]

Comment

#### *Summary:*

Letitia Cornwallis Trust is located close to the A40. It has experienced considerable loss of local resources, firstly the post office, then the school and now the remaining local public house has proven unsustainable in current times. Trustees aim to make use of its assets to provide some part time restaurant/bistro services (as Cym Dda) as well as a replacement service for meals on wheels. If proven viable (a feasibility study is in hand) then facilities could be provided for young people/children/toddlers to replace the loss of togetherness/community relating to the closure of the local school.

### *Response / Recommendation*

**Noted. This relates to a detailed matter which is beyond the remit of the Preferred Strategy.**

## Paragraph 5.7

### *Representation(s)*

### *Nature*

1365 Darren Hall [526]

Comment

#### *Summary:*

I hope that the existing allocations with regard to SLA designation are maintained and that these sites are offered the same protection and consideration as other designated sites.

### *Response / Recommendation*

**Comments noted. Strategic Policy 13 provides the overarching framework for the natural environment, whilst SP 11 provides for consideration of high quality design. The consideration of whether any Special Landscape Areas will be identified in the Revised LDP, along with any resultant evidential facets, will be a matter for the deposit LDP.**

### *Representation(s)*

### *Nature*

682 Lynda James [3039]

Comment

#### *Summary:*

Cornwallis House is a Grade 2 listed building.

### *Response / Recommendation*

**Noted, site specific matters are considered as part of the candidate site process.**

## Paragraph 5.12

### *Representation(s)*

### *Nature*

685 Lynda James [3039]

Support

#### *Summary:*

Letitia Cornwallis "vision" if agreed and implemented could help create some jobs thereby keeping or attracting younger people to help address the current imbalance between the older and younger peoples.

### *Response / Recommendation*

**Noted, site specific matters are considered as part of the candidate site process.**

## Paragraph 5.13

### *Representation(s)*

### *Nature*

1379 Darren Hall [526]

Object

#### *Summary:*

The projection for LDP 2018-2033 requirements needs to be based on up-to-date predictions. Based on previous timelines updated projections/publications are were/are due in 2017/2018.

Clearly outdated information and an 'adventurous' attitude towards development and growth within the county, need to be tempered and controlled and based on a cautionary outlook.

These targets, whilst set at a pre-deposit stage are the fundamental drivers and ultimately clauses that enable uncontrolled, undesired and more importantly unrequired development, in areas that cannot support the infrastructure requirements and will simply not recover from the impacts of such developments.

#### *Change To Plan Sought:*

please see representation and summary.

### *Response / Recommendation*

**Disagree. The Council is proposing a "Balanced Community and Sustainable Growth Strategy" which is underpinned by a robust evidence base and has been subject to consensus building - notably through the Key Stakeholder Forum. In terms of the growth figures, the strategy seeks to provide balanced growth centred on the delivery of our communities' needs and the delivery of the region and the Council's strategic and regeneration objectives.**

## Paragraph 5.15

### *Representation(s)*

### *Nature*

687 Lynda James [3039]

Comment

#### *Summary:*

Cornwallis House is located next to the old part of the A40 at Llanwrda and has plenty of space for parking both on the "estate" and on the old A40.

### *Response / Recommendation*

**Noted, site specific matters are considered as part of the candidate site process.**

## Paragraph 5.17

### *Representation(s)*

### *Nature*

688 Lynda James [3039]

Support

#### *Summary:*

Buses run every hour from the bus stop next to Cornwallis land thus connecting Llanwrda with Llandovery , Llandeilo and Carmarthen.

### *Response / Recommendation*

**Noted, site specific matters are considered as part of the candidate site process.**

## Section 6. Issues Identification

### Paragraph 6.6

#### Representation(s)

811 Natural Resources Wales (Miss Sharon Luke) [3253]

#### Nature

Comment

#### Summary:

The list of summary issues in Section 6.6 appear reasonable and we have no further suggestions

#### Response / Recommendation

Comments noted / support welcomed.

#### Representation(s)

689 Lynda James [3039]

#### Nature

Comment

#### Summary:

The Letitia Cornwallis "vision" fits with and thereby enables resolution of some of the issues identified i.e building affordable housing (no need to buy land) and providing and maintaining some employment and the provision of a large space for recreational purposes.

#### Response / Recommendation

Noted, site specific matters are considered as part of the candidate site process.

#### Representation(s)

1059 Cai Parry [822]

#### Nature

Comment

#### Summary:

The respondent supports Issues 18 & 19 in paragraph 6.6 which relates to the recognition of the lack of new homes being built in some areas, and the lack of a five year supply of housing and the need for a housing mix.

However, the respondent states that Issue 1 in paragraph 6.6 should be amended to link the delivery of the projects in Llanelli and Carmarthen associated with the Swansea Bay City Deal with the delivery of housing.

#### Response / Recommendation

Comments noted. Support welcomed for issues 18 and 19 of paragraph 6.6.

In regard to the respondents comment on Issue 1 of Paragraph 6.6, links with other areas of the Plan such as housing growth, will be further analysed during preparation of the Deposit LDP and linkages will be made between associated sections where appropriate.

#### Representation(s)

1665 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]

#### Nature

Support

#### Summary:

We note and welcome the inclusion of issue 23 regarding infrastructure capacity to support development. The availability of our infrastructure capacity is a key element in ensuring sustainable and viable development sites.

#### Response / Recommendation

Support welcomed.



**Representation(s)**

**Nature**

**9 Carmarthenshire County Council (Mr Stuart Walters) [2345] Support**

**Summary:**

The issues section is well balanced as are the strategic objectives. From an Economic Development perspective the mention of city deal, town centres, rural area growth (including employment opportunities), a buoyant visitor economy, urban and rural deprivation, poverty, infrastructure capacity, lack of employment opportunities, broadband and public services in rural areas, a sense of place and disused buildings in the issues section is welcomed.

**Response / Recommendation**

**Support welcomed.**

**Representation(s)**

**Nature**

**1680 Natural Resources Wales (Miss Sharon Luke) [3253] Support**

**Summary:**

The list of summary issues in Section 6.6 appear reasonable and have no further suggestions. We specifically support the inclusion of the following issues:

- \* Risks from flooding and the challenges presented by climate change.
  - \* Biodiversity designations ranging from international to local level.
  - \* An ecological footprint that is currently exceeding sustainable levels.
  - \* Rich landscape and townscape qualities.
  - \* Beauty peace and quiet, open green spaces and fresh air are contributors to happiness in rural areas.
  - \* Need to promote energy efficiency in proposed and existing developments.
- These appear to correlate well with the findings of the SA.

**Response / Recommendation**

**Support welcomed**

**Representation(s)**

**Nature**

**1776 Mr John Morris [3777] Support**

**Agent: LRM Planning (Mr. Michael Rees) [3002]**

**Summary:**

We are supportive of the vision for Carmarthenshire, however we are strongly of the view that it should specifically add "where the needs of residents are met" to the vision.

Importantly, meeting the needs of residents will be key to achieving the wider Wales Well Being Goals in particular helping to create a more equal Wales, a more prosperous Wales, a more resilient Wales and a Wales of cohesive communities, as well as in meeting the requirements of the new PPW10 and the provision of the right development in the right place. Indeed, meeting needs in an appropriate and sustainable manner can contribute towards:

- Growing our economy in a sustainable manner;
- Making best use of resources;
- Facilitating accessible and healthy environments;
- Creating and sustaining communities; and
- Limiting environmental impact.

**Response / Recommendation**

**Noted. The Revised LDP is being prepared in full accordance with the provisions of the Wellbeing of Future Generations Act and PPW. The respondent's comments in relation to need is noted and the Plan will be consistent with national planning policy and the principles of sustainability in this regard, as well as recognising the characteristics of the County and its communities.**

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***Representation(s)***

***Nature***

**611 Ifan Beynon-Thomas [3198]**

**Support**

***Summary:***

I support the fact that one of the 33 summary issues references 'a buoyant visitor economy with potential to grow'. It is vitally important that the LDP policies recognise the important contribution that tourism makes to the economy of the County and that indeed there is scope for additional facilities.

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***Response / Recommendation***

**Support welcomed.**



**Section 7. A Vision for 'One Carmarthenshire'**

**Section 7. A Vision for 'One Carmarthenshire'**

**Representation(s)**

**Nature**

**2099** Union Tavern Estate [3913]

**Comment**

*Agent: Barton Willmore (Joe Ayoubkhani) [646]*

**Summary:**

We support the LDP's vision which seeks to ensure that the Draft Preferred Strategy is positive and sufficiently aspirational. It is imperative that the policies of the LDP enable this vision to be met - for example, through providing sufficient housing growth to underpin the confident and ambitious economic aspirations of the Council.

**Response / Recommendation**

**Support Welcomed**

**Paragraph 7.3**

**Representation(s)**

**Nature**

**690** Lynda James [3039]

**Support**

**Summary:**

Without sustainable rural communities the country side would decline with an impact on the related tourism. The Letitia Cornwallis Trust aims to revitalize what was a once vibrant small community which despite its recent resource losses still presents a well cared for and loved community. The recent revival of the Trust's activities have led to many local people volunteering to help in achieving a greater sense of community.

**Response / Recommendation**

**Noted, site specific matters are considered as part of the candidate site process.**

**One Carmarthenshire**

**Representation(s)**

**Nature**

**265** RWE Innogy UK Ltd (Miss Eleri Davies) [471]

**Object**

**Summary:**

Although 'Renewable Energy' is included in the graphic associated with the 'Our Vision - One Carmarthenshire' section of the Preferred Strategy (Easy Read Version), the 'Vision' fails to mention climate change, energy or anything vaguely relevant to the renewable energy sector.

Construction of the Brechfa Forest West Wind Farm in Carmarthenshire saw approximately £40 million of the total £105 million capex spent in Wales, with a further £459,200 per annum paid into a community benefit fund for the lifetime of the wind farm (up to 25 years). This demonstrates the significant investment opportunities available from onshore wind farms.

**Change To Plan Sought:**

'Our Vision- One Carmarthenshire' should include specific reference to climate change and the need to secure a low carbon future, which shall include (amongst other measures) renewable energy.

**Response / Recommendation**

**Disagree, it is implicit that renewable energy will be integral in the creation of sustainable communities, there is no need for a specific reference as this is the vision for the Plan.**

**Representation(s)**

**Nature**

**612 Ifan Beynon-Thomas [3198]**

**Object**

**Summary:**

I consider that the 'One Carmarthenshire' approach should recognise that Carmarthenshire should be a place to visit and enjoy as well as 'start, live and age well'. This would ensure that boosting tourism is considered as one of the key objectives of the Plan. This would accord with the fact that Strategic Objective 13 seeks 'to make provision for sustainable & high quality all year round tourism related initiatives.'

**Change To Plan Sought:**

The 'One Carmarthenshire' approach should recognise that Carmarthenshire should be a place to visit and enjoy as well as 'start, live and age well'.

**Response / Recommendation**

**Agreed in part. Add the following words at the end of paragraph 1 of the Vision so it reads "...valued and respected for residents and visitors alike"**

**Representation(s)**

**Nature**

**1061 Cai Parry [822]**

**Support**

**Summary:**

Support the Vision for 'One Carmarthenshire' including references to economic objectives and the City Deal.

**Response / Recommendation**

**Support Welcomed.**

## Section 8. Strategic Objectives

### Paragraph 8.2

<i>Representation(s)</i>	<i>Nature</i>
<b>1681</b> Natural Resources Wales (Miss Sharon Luke) [3253]	<b>Support</b>

*Summary:*

We welcome the recognition that the Well Being of Future Generations Act 2015 was a driver to review the Adopted LDP's Strategic Objectives and the utilisation of the Carmarthenshire Well Being Plan wellbeing objectives to group the Revised LDP's Strategic Objectives.

We are satisfied with the Revised LDP Strategic Objectives as noted in Section 8.6.

***Response / Recommendation***

**Support welcomed**

### Paragraph 8.3

<i>Representation(s)</i>	<i>Nature</i>
<b>812</b> Natural Resources Wales (Miss Sharon Luke) [3253]	<b>Comment</b>

*Summary:*

We welcome the recognition that the Well Being of Future Generations Act 2015 was a driver to review the Adopted LDP's Strategic Objectives and the utilisation of the Carmarthenshire Well Being Plan wellbeing objectives to group the Revised LDP's Strategic Objectives.

We are satisfied with the Revised LDP Strategic Objectives as noted in Section 8.6.

***Response / Recommendation***

**Comments noted / support welcomed**

### Paragraph 8.6

<i>Representation(s)</i>	<i>Nature</i>
<b>1682</b> Natural Resources Wales (Miss Sharon Luke) [3253]	<b>Support</b>

*Summary:*

We are satisfied with the Revised LDP Strategic Objectives as noted in Section 8.6.

***Response / Recommendation***

**Support welcomed.**

<i>Representation(s)</i>	<i>Nature</i>
<b>813</b> Natural Resources Wales (Miss Sharon Luke) [3253]	<b>Support</b>

*Summary:*

We are satisfied with the Revised LDP Strategic Objectives as noted in Section 8.6.

***Response / Recommendation***

**Support welcomed.**

**Representation(s)**

**Nature**

**692** Lynda James [3039] **Support**

*Summary:*

Also the "vision" of the Letitia Cornwallis Trust.

**Response / Recommendation**

**Noted, site specific matters are considered as part of the candidate site process.**

**Paragraph 8.6 - SO6**

**Representation(s)**

**Nature**

**2040** Persimmon Homes West Wales (Mrs Kate Harrison) [3410] **Comment**

*Summary:*

The respondent notes that this objective makes reference to encouraging the reuse of previously developed land. This approach falls in line with Planning Policy Wales Edition 10, however in order to achieve the construction of 10,480 new homes in the county, the respondent states that consideration should be given to Greenfield sites on the edge of sustainable settlements.

**Response / Recommendation**

**Noted. The identification and selection of sites will be conducted in a manner consistent with PPW Ed.10 and the site search sequence. In this regard reference is made to PPW paragraph 3.41.**

**Representation(s)**

**Nature**

**1666** Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830] **Support**

*Summary:*

The availability or capacity of infrastructure is a key aspect in determining the sustainability of a settlement, therefore we support the inclusion of SO6.

**Response / Recommendation**

**Support welcomed.**

**Representation(s)**

**Nature**

**1063** Cai Parry [822] **Support**

*Summary:*

BDW Homes is supportive of the wording of Strategic Objective SO6 which seeks to ensure that "The principles of spatial sustainability are upheld by directing development to sustainable locations with access to services and facilities...". This Strategic Objective is therefore consistent with the 'Key Planning Principles' set out within Planning Policy Wales (Edition 10, p. 18) which seek to ensure that the planning system contributes to the long-term economic well-being of Wales, by making use of existing infrastructure and facilities.

**Response / Recommendation**

**Support welcomed.**

**Representation(s)****Nature****1653** Simon Chaffe [855]**Support****Summary:**

The respondent supports Strategic Objective SO6 - 'To ensure that the principles of spatial sustainability are upheld by directing development to sustainable locations with access to services and facilities and wherever possible encouraging the reuse of previously developed land.'

**Response / Recommendation****Support welcomed.****Paragraph 8.6 - SO7****Representation(s)****Nature****266** RWE Innogy UK Ltd (Miss Eleri Davies) [471]**Object****Summary:**

In the context of making a significant contribution towards tackling the cause and adapting to the effect of climate change, Strategic Objective 7 (SO7) correctly refers to promoting the efficient use and safeguarding of resources but fails to reference renewable energy generation which is a fundamental element of the Welsh Government's 'Energy Hierarchy for Planning' (paragraphs 5.714 - 5.715 and Figure 9, Planning Policy Wales, Edition 10, December 2018), namely Reduce Energy Demand, Use Energy Efficiently, Renewable Energy Generation, Minimise carbon impact of other energy generation, Minimise extraction of carbon intensive energy materials.

**Change To Plan Sought:**

Revise wording of SO7 to include reference to "renewable energy generation" as an integral part of the strategic objective to make a significant contribution towards tackling the cause and adapting to the effects of climate change.

**Response / Recommendation****Agreed. Include reference to renewable energy within strategic objective SO7.****Paragraph 8.6 - SO10****Representation(s)****Nature****1777** Mr John Morris [3777]**Comment****Agent: LRM Planning (Mr. Michael Rees) [3002]****Summary:**

We are supportive of the vision for Carmarthenshire, however we are strongly of the view that it should specifically add "where the needs of residents are met" to the objectives. Importantly, meeting the needs of residents will be key to achieving the wider Wales Well Being Goals in particular helping to create a more equal Wales, a more prosperous Wales, a more resilient Wales and a Wales of cohesive communities, as well as in meeting the requirements of the new PPW10 and the provision of the right development in the right place. Indeed, meeting needs in an appropriate and sustainable manner can contribute towards:

- Growing our economy in a sustainable manner;
- Making best use of resources;
- Facilitating accessible and healthy environments;
- Creating and sustaining communities; and
- Limiting environmental impact.

**Response / Recommendation**

**Noted. The Revised LDP is being prepared in full accordance with the provisions of the Wellbeing of Future Generations Act and PPW. The respondent's comments in relation to need is noted and the Plan will be consistent with national planning policy and the principles of sustainability in this regard, as well as recognising the characteristics of the County and its communities.**

<i>Representation(s)</i>	<i>Nature</i>
<b>1068</b> Cai Parry [822]	<b>Object</b>
<p><i>Summary:</i></p> <p>BDW Homes suggests that the wording of Strategic Objective SO10, which refers to the delivery of new housing, should be reconsidered to make reference to delivering an appropriate number of new homes to meet society's needs - as well as an appropriate mix. One of the key issues within the 'Active &amp; Social Places' theme within Planning Policy Wales (p. 44) is the need to ensure that "there is sufficient housing land available to meet the need for new private market and affordable housing". SO10 should therefore be amended in line with this key issue.</p> <p><i>Change To Plan Sought:</i></p> <p>Make specific reference to delivering an "appropriate number of new homes".</p>	

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***Response / Recommendation***

**Agreed in part. Amend SO10 to include reference to an appropriate number as well as mix of new homes.**

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**Paragraph 8.6 - SO14**

<i>Representation(s)</i>	<i>Nature</i>
<b>1667</b> Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]	<b>Support</b>
<p><i>Summary:</i></p> <p>The availability or capacity of infrastructure is a key aspect in determining the sustainability of a settlement, therefore we support the inclusion of SO14.</p>	

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***Response / Recommendation***

**Support welcomed.**



## Section 9. Strategic Growth & Spatial Options

### Section 9. Strategic Growth & Spatial Options

**Representation(s)**

**Nature**

**1635** Welsh Government (Mr Mark Newey) [13]

**Comment**

**Summary:**

Growth Levels: Homes & Jobs

The authority has explored six population based growth scenarios and two employment-led scenarios. The authority has concluded the WG-2014 based projections would result in low levels of housing growth impacting negatively on demographic change (population decline) and ability to support economic growth. The 2014-based Principal and 10 year migration variant projections would result in a dwelling requirement of 3,367 and 6,542 respectively. The Council's preferred growth option is 'PG Long Term' which is predicated on significant internal and international migration flow assumptions averaging 1,423 persons pa for the sixteen year period 2001/02-2016/17. This period takes into account the high migration levels prior to 2008, and lower net migration following the recession. This is particularly relevant in this context as deaths exceed births; net migration being the dominant driver of population change. The PG Long Term Scenario results in a dwelling requirement of 9,887 dwellings (659 p/a) over the plan period. This is based on a 3.4% vacancy rate (VR) (adjusted from 6.3% Census VR) which takes into account recent data on second and empty homes. This is a deviation of 6,520 dwellings above the WG-2014 based principal projection and 3,345 dwellings above the 10-year migration variant. The proposed housing requirement of 9,887 is a substantial reduction of 5,310 dwellings from a requirement of 15,197 homes in the current adopted plan.

The evidence also explains that the jobs led scenario(s) tested would result in a requirement for 17,000 - 20,000 homes over the plan period. The Council has stated that this would result in an undeliverable and unsustainable growth strategy. Recent housing completions based on 10 year average JHLAs figures are approximately 500 d/pa. In summary, the Council has chosen a demographic led scenario that will contribute to the delivery of the Council's economic aspirations. The population increase targeted by the PG Long Term Scenario would result in supporting the creation of 5,295 jobs (353 p/a) over the plan period. The authority must fully justify/evidence that the growth levels are directed to the most sustainable places, related to the scale and location of housing need, not impacting negatively on the Welsh language and is realistic and deliverable. You should also demonstrate the growth strategy is compatible with the aspirations of neighbouring authorities and provides the most sustainable locations for growth for the wider area. See comments on spatial strategy.

**Response / Recommendation**

**Noted, the scale and distribution of growth will be subject to further evidencing as part of the preparation of the Deposit LDP.**

**Matters in relation to the Welsh language will be considered as part of the LDP's evidence base and within the Sustainability Appraisal. See representation 1647.**

### Paragraph 9.1

**Representation(s)**

**Nature**

**2429** Rhanbarth Sir Gâr Cymdeithas yr Iaith (Rhanbarth Sir Gâr) [2370]

**Object**

**Summary:**

The respondent raises potential issues relating to the use of economic and regeneration data used to inform the level of housing growth needed in the County. The representation refers to the anticipated sources and location of future jobs growth and note their concerns that some pertinent matters such as Brexit, Arfor, rural employment and the future of the Wellness Village, have not been fully considered.

**Response / Recommendation**

**Comments are noted. Further evidence will be produced to inform the economic needs of the County and its impacts upon the County's housing needs.**

## Paragraph 9.8

### *Representation(s)*

### *Nature*

1070 Cai Parry [822]

Support

*Summary:*

Council's approach for calculating housing requirement is consistent with Planning Policy Wales.

### *Response / Recommendation*

Support welcomed.

## Paragraph 9.15

### *Representation(s)*

### *Nature*

693 Lynda James [3039]

Comment

*Summary:*

Agree with the conclusions but possible consequence of Brexit are not included, understandably as nobody as yet knows what is going to happen. However the differences in the way house prices are changing may be an indication that young people will move away from the South East of the UK where housing in any form is mostly unaffordable by individuals on an average income.

Apart from that general comment, Cornwallis "vision" does imply opportunities for employment in a rural community which is near to the local cottage hospital at Llandovery.

### *Response / Recommendation*

Comment noted - site specific matters are considered as part of the candidate site process. In relation to Brexit, any potential implications will be monitored and suitably acknowledged in due course. It should be noted that Key issue 32 of the Draft Pre Deposit Preferred Strategy does acknowledge emerging national and regional considerations - including brexit.

## Paragraph 9.23

### *Representation(s)*

### *Nature*

1766 Savills (Mr Nick Heard) [3216]

Comment

*Agent: Savills (Mr Nick Heard) [3216]*

*Summary:*

A total of seven population-led and employment-led growth options are considered with the Draft Preferred Strategy ultimately adopting the 'Population Growth Long Term' scenario which sets a total requirement of 9,887 units across the 15 year RLDP period, equating to 658 per year. The use of a trend based projection rather than a single base dated population projection is considered the most appropriate and sensible mechanism given the differences between the last four sets of projections.

### *Response / Recommendation*

Comments Noted. The Council considers that the population and household projection is based on a sound and reasonable assessment, by identifying a number of factors which influence it. The preferred projection affords an allowance in the potential uplift on the existing deliverability of sites and offers an opportunity to provide a positive mechanism for future growth should the economy grow. The level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP.

## Paragraph 9.29

**Representation(s)**

**Nature**

**1767 Savills (Mr Nick Heard) [3216]**

**Object**

*Agent: Savills (Mr Nick Heard) [3216]*

*Summary:*

The Population Growth Pre-Recession Scenario which is based on pre-2008 recession levels of in-migration shows a higher housing need than the Population Growth Long Term scenario but is dismissed as being 'undeliverable and unsustainable'. The Williams Family suggest that there is an opportunity to be more positive and even if the housing need is not based on this projection in its entirety, there is scope for an allowance to be made for a more positive economic context in the future.

**Response / Recommendation**

**Comments Noted. The Council considers that the population and household projection is based on a sound and reasonable assessment, by identifying a number of factors which influence it. The preferred projection affords an allowance in the potential uplift on the existing deliverability of sites and offers an opportunity to provide a positive mechanism for future growth should the economy grow. The level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP.**

## Paragraph 9.40

**Representation(s)**

**Nature**

**638 Simrock Holdings Ltd [3217]**

**Comment**

*Agent: Savills (Mr Nick Heard) [3216]*

*Summary:*

The Population Growth Pre-Recession Scenario which is based on pre-2008 recession levels of in-migration shows a higher housing need than the Population Growth Long Term scenario but is dismissed as being 'undeliverable and unsustainable'. SHL suggest that there is an opportunity to be more positive and even if the housing need is not based on this projection in its entirety, there is scope for an allowance to be made for a more positive economic context in the future

**Response / Recommendation**

**Comment Noted. The Council considers that the population and household projection is based on a sound and reasonable assessment, by identifying a number of factors which influence it. The preferred projection affords an allowance in the potential uplift on the existing deliverability of sites and offers an opportunity to provide a positive mechanism for future growth should the economy grow. The level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP.**

**Representation(s)**

**Nature**

**1584** The Williams Family . [3585]

**Comment**

**Agent: Savills (Mr Nick Heard) [3216]**

**Summary:**

The Population Growth Pre-Recession Scenario which is based on pre-2008 recession levels of in-migration shows a higher housing need than the Population Growth Long Term scenario but is dismissed as being 'undeliverable and unsustainable'. It is suggested that there is an opportunity to be more positive and even if the housing need is not based on this projection in its entirety, there is scope for an allowance to be made for a more positive economic context in the future.

**Response / Recommendation**

**The Council considers that the population and household projection is based on a sound and reasonable assessment, by identifying a number of factors which influence it. The preferred projection affords an allowance in the potential uplift on the existing deliverability of sites and offers an opportunity to provide a positive mechanism for future growth should the economy grow.**

**Paragraph 9.41**

**Representation(s)**

**Nature**

**2041** Persimmon Homes West Wales (Mrs Kate Harrison) [3410]

**Support**

**Summary:**

The respondent is supportive of the divergence from the Welsh Government 2014 based projections which would equate to a housing requirement of 6,542 over the plan period (2018-2033) as this is unlikely to support the Council's Visions and Objectives in relation to meeting the employment needs of the area and contributing at a regional level to the delivery of the Swansea Bay City Deal.

The respondent supports the preferred growth option of 'Population Growth Long Term' would provide a housing requirement of 9,887 dwellings over the plan period and as stated in the preferred strategy, 'allow the flexibility to drive sustainable housing growth'. This more ambitious housing requirement will facilitate the economic growth required in the county and will be more effective in achieving the Council's vision and objectives.

**Response / Recommendation**

**support welcomed.**

**Representation(s)**

**Nature**

**1071** Cai Parry [822]

**Support**

**Summary:**

BDW Homes is supportive of the Council's Preferred Strategic Growth Option, on the basis that it seeks an ambitious but achievable level of growth to support the aspirations of the Strategic Regeneration Plan for Carmarthenshire. Accordingly, BDW Homes considers that the Council's approach is founded upon robust evidence and considers other issues in addition to the latest household projections, in accordance with paragraph 4.2.6 of Planning Policy Wales (Edition 10).

**Response / Recommendation**

**Support welcomed.**

**Representation(s)****Nature****2020 Swallow Investments Limited [3995]****Support****Summary:**

Section 9 of the LDP considers a number of alternative Strategic Growth and Spatial Options to support employment growth and the delivery of housing and sustainable development generally. So far as Strategic Growth Options are concerned, paragraphs 9.41 to 9.43 of the LDP confirm a preferred 'Population Growth Long Term Scenario', which is forecast to deliver 9,887 new dwellings (649 new dwellings per annum) and a minimum of 5,295 additional jobs over the LDP period 2018-2033.

My client supports the LDP's preferred Strategic Growth and Spatial Options - they will deliver new housing in line with requirements and new jobs to match the same; and represent an optimistic, though not unrealistic set of assumptions and aspirations, geared towards encouraging housing and economic growth in the County over the LDP period.

**Response / Recommendation****Support welcomed.****Paragraph 9.44****Representation(s)****Nature****1770 Savills (Mr Nick Heard) [3216]****Comment****Agent: Savills (Mr Nick Heard) [3216]****Summary:**

To deliver the amount of new housing that is required over the Review LDP period six Spatial Options are identified for the distribution of growth.

The Draft Proposed Strategy proposes that Spatial Option 4 which seeks to disperse growth in a way which reflects the role of settlements in relation to their wider catchment is adopted. This would mean that most growth would be focussed in Carmarthen and the surrounding area, the Llanelli Coastal Belt, and the Ammanford and Cross Hands area.

The 2018 Joint Housing Land Availability Study (JHLAS) shows a 3.8 year housing land supply. This represents the fifth consecutive year where a five year supply of housing has not been demonstrated and the continued failure to demonstrate a five year supply since the adoption of the LDP (the Adopted LDP) in 2015. In real terms, this means that in the four years since the adoption of the ALDP 503, 608, 518, and 511 units have been delivered, substantially short of the 1,052 unit a year requirement that the ALDP sets to meet housing need.

There is evidently a delivery problem and The Williams Family suggest that any Spatial Option pursued needs to stand a realistic chance of delivering the required amount of housing. Whilst Spatial Option 4 appears to be a sensible and logical option, The Williams Family suggest that, if Option 6 (Market Led Option) is not to be pursued in its entirety (and the risks associated with such an approach are understood), the spatial strategy must give weight to market conditions and the delivery of houses previously over the Adopted LDP period.

**Response / Recommendation**

**Comments Noted. The Council as part of the LDP process are reviewing all existing housing allocations sites to identify those that are not contributing to the LDP strategy, and a wide ranging assessment is being undertaken to make sure that the most appropriate sites are allocated in the revised Plan. This will be reflected within the apportionment of sites within the each cluster and tier.**

**Representation(s)****Nature****1771** Savills (Mr Nick Heard) [3216]**Comment****Agent: Savills (Mr Nick Heard) [3216]****Summary:**

The number of units built on the allocated sites in St Clears has been considerably higher than in the other Adopted LDP Service Centres, demonstrating that St Clears is an attractive location for growth and is capable of delivering housing and accordingly it is suggested that the Spatial Options reflect this. It also shows that there is only a limited amount of allocated sites left within St Clears and, if a more market-led approach is to be taken, the need for a review of existing and the identification of new allocations is required.

**Response / Recommendation**

**Comments Noted. Each settlement within the settlement hierarchy will be assessed in light of their potential for accommodating and delivering future development. This will be considered as part of the emerging evidence base leading into the publication of the Deposit LDP.**

**Paragraph 9.49****Representation(s)****Nature****694** Lynda James [3039]**Support****Summary:**

The proposal is sensible but people will travel some distances to their work place so it is wrong to assume all accommodation should be built in the same location as planned employment opportunities. A percentage of people would prefer to live in a rural area rather than an urban area and be prepared to commute.

**Response / Recommendation**

**Noted, site specific matters are considered as part of the candidate site process.**

**Representation(s)****Nature****544** RSAI [3167]**Support****Agent: Lichfields (Mr Arwel Evans) [3166]****Summary:**

We agree with paragraph 9.49 of the Preferred Strategy which states that housing development will need to be located in the same broad location as employment opportunities. We also agree that infrastructure improvements need to be aligned with new development if the existing infrastructure is not adequate to accommodate the development.

We consider it is important that the spatial option is determined taking account of the function and role of settlements

**Response / Recommendation**

**Support welcomed.**

## Paragraph 9.51

**Representation(s)**

**Nature**

**1668** Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]

**Comment**

*Summary:*

We note that the Council propose to use the Population Growth Long Term scenario which sets a housing requirement of 9,887 units over the LDP Period.

Option 2 - Infrastructure and Transport Network Options  
 Available public sewerage and wastewater treatment works (WwTW) capacity is a key element to ensuring sustainable and viable development sites, therefore we welcome the provisions of this spatial option, and are pleased to note that it seeks to encourage growth in areas where there is existing infrastructure capacity or where there are planned improvements.

**Response / Recommendation**

**Comments noted. The availability of infrastructure is a key indicator of deliverability and in the promotion of sustainable development. Key facets of option 2 (notably location of infrastructure) would have fed into the favoured option. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard.**

## Paragraph 9.52

**Representation(s)**

**Nature**

**1639** Welsh Government (Mr Mark Newey) [13]

**Comment**

*Summary:*

Preferred Strategy - The Council has concluded through the Sustainability Appraisal (SA) that a Hybrid Option - 'Balanced Community and Sustainable Growth Strategy' is the most appropriate. This option has been subject to an SA (SA, section 4.5) and is the 'Preferred Strategy'. The Preferred Strategy incorporates the core elements from Options, 2, 4, 5 and 6 which are summarised as follows:

- Growth is assigned to urban areas, while also recognising the role and function of rural settlements
- Reflects investment opportunities and economic benefits afforded to the County through the City Deal.
- Recognised that sustainable growth needs to be supported by the availability and range of infrastructure.
- Growth should also be deliverable and oriented to community need and market demand.

Further clarity is required on the spatial outcome of the Preferred Strategy. The SA highlights that the negative implications of Option 4 are that it could result in a disproportionate amount of development in unsustainable locations, generating significant additional car journeys. In the absence of a LHMA it is also unclear how the Preferred Strategy has been influenced by the level and location of housing need. The Hybrid Option and its spatial distribution requires further justification specifically; how it will deliver affordable housing, employment growth, reduced commuting, relates to the sustainable transport hierarchy (including active travel) infrastructure, minimises air pollution and potential negative impacts on the Welsh Language. These should be considered in light of 'future proofing' and how technology may shape how places function in the future, taking account of digital connections, telecoms, low emission vehicles and the associated benefits on movement patterns.

**Response / Recommendation**

**Noted. See response to representation 1640.**



<i>Representation(s)</i>	<i>Nature</i>
<b>2430</b> Rhanbarth Sir Gâr Cymdeithas yr Iaith (Rhanbarth Sir Gâr) [2370]	<b>Object</b>

*Summary:*

The respondent supports Spatial Option 4 - Community Led Option. The respondent notes that they would recommend a strategy based upon concentric circles, namely a village community; a circle of villages; county level; region; Wales, and the strategy would identify the services and proposals which would be suitable for each level within the proposed strategy. The respondent also notes that the Preferred Strategy should reduce the out-migration of young people from the County and specifically state this as an aim of the Plan.

*Response / Recommendation*

**Comments are noted. The Preferred Strategy has been largely influenced by Spatial Option 4, albeit this has been adapted to take account of other influencing factors too. In regard to the proposed approach relating to concentric circles, it is considered that the preferred strategy in fact follows a similar approach in that a settlement hierarchy is set out in Policy SP16: Sustainable Distribution - Settlement Framework which is informed, amongst other factors, by the availability of services and facilities in each settlement or network of settlements.**

**With regards to reducing the out-migration of young people, this is acknowledged as a key issue under paragraph 6.6. It has also been a key consideration in the evaluation of the options and the selection of the preferred strategy, please see chapters 9 and 10 for an assessment of this. Whilst reducing the out-migration of young people has not been referenced specifically as an aim or objective of the Plan, it is considered that a number of the Plan's objectives would make a significant contributions towards achieving this aim, especially strategic objectives 2, 3, 4, 11 and 12. However, we would welcome ongoing discussions on this matter to determine whether an additional objective should be identified.**

**Paragraph 9.55**

<i>Representation(s)</i>	<i>Nature</i>
<b>1685</b> Natural Resources Wales (Miss Sharon Luke) [3253]	<b>Comment</b>

*Summary:*

We note your preferred option (Balanced Community and Sustainable Growth Strategy) and support your acknowledgment "that in delivering sustainable growth that it needs to be supported by the availability of a range of appropriate infrastructure". We consider water resources and drainage arrangements such as provision of sewerage infrastructure to be paramount.

*Response / Recommendation*

**Support welcomed. The Council fully agrees that water resources and drainage arrangements such as provision of sewerage infrastructure to be of paramount importance. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard.**

<i>Representation(s)</i>	<i>Nature</i>
<b>814</b> Natural Resources Wales (Miss Sharon Luke) [3253]	<b>Comment</b>

*Summary:*

We note your preferred option (Balanced Community and Sustainable Growth Strategy) and support your acknowledgment "that in delivering sustainable growth that it needs to be supported by the availability of a range of appropriate infrastructure". We consider water resources and drainage arrangements such as provision of sewerage infrastructure to be paramount.

*Response / Recommendation*

**Comments noted / support welcomed. The Council fully agrees that water resources and drainage arrangements such as provision of sewerage infrastructure to be of paramount importance.**



**Representation(s)****Nature****1778** Mr John Morris [3777]**Comment****Agent: LRM Planning (Mr. Michael Rees) [3002]****Summary:**

We are supportive of a hybrid option of the various scenarios presented. However, we are of the view that it ought to be more weighted towards the Pre-recession level of growth.

In the first instance we support the approach of ruling out the low growth options (WG 2014 based principal and 10 yr projections, PG Short term and 10 year projections). Such approaches would only reinforce such negative trends identified within the background paper.

We are concerned that the preferred approach should not limit aspirations or growth particularly given the trends that are have been experienced (affordability problems, loss of younger cohorts and trends towards an ageing population). Such an outcome would seem to be contrary to the Welsh Government's Well Being goals, the Placemaking objectives and the aims of the planning system.

Indeed, for this reason we do not believe that the Pre-Recession Growth Projection should be ruled out in its entirety on the basis that it is not achievable. If undeliverable sites are allocated then this will be the case for any of the scenarios.

Whilst our preference is to retain a positive and aspirational intervention that allows flexibility for growth, jobs, mixed communities and prosperity (in line with the vision and objectives of the LDP Review), should the current favoured option be carried forward then we are strongly of the view that it must rely upon a fresh and deliverable supply of homes. Indeed, relying upon existing allocations that have not been brought forward will not achieve the objectives rather it will reinforce the negative trends that have been experienced.

**Response / Recommendation**

**Disagree - The population and household projection scenario identified in the Preferred Strategy considers a long term view for household growth within the county which is reflective of, and takes a balanced view on achieving the housing requirement for the period 2018-2033. Setting a scenario based on the pre-recession level of growth would be considered unsound, as it would be more reflective of the requirements within the adopted LDP, which is currently not being achieved.**

**The comment relating to existing sites is noted, and the Council as part of the LDP process, are reviewing all existing housing allocations sites to identify those that are not contributing to the LDP strategy, and a wide ranging assessment is being undertaken to make sure that the most appropriate sites are allocated in the revised Plan.**

**Representation(s)****Nature****640** Simrock Holdings Ltd [3217]**Comment****Agent: Savills (Mr Nick Heard) [3216]****Summary:**

SHL does not contest the selection of Option 4 as the most appropriate spatial option but stress that Llangennech performs very well in relation the other Strategic Options that have not been selected. It is included within the Llanelli Growth Area in the ALDP (Option 1 - Current LDP Option), is well located adjacent to the A4138 and within 1km from Junction 48 of the M4 (Option 2 - Infrastructure and Transport Network Option) and has a strategic position in-between Carmarthenshire and Swansea (Option 5 - Swansea Bay City Region Influence Option).

Given that Llangennech performs favorably in connection to a number of unselected Spatial Options, it is considered that this demonstrates it suitability and appropriateness for additional growth

**Response / Recommendation**

**Comments Noted. Each settlement within the settlement hierarchy will be assessed in light of their potential for accommodating and delivering future development. This will be considered as part of the emerging evidence base leading into the publication of the Deposit LDP.**

**Representation(s)****Nature****1585** The Williams Family . [3585]**Comment****Agent: Savills (Mr Nick Heard) [3216]****Summary:**

There is evidently a delivery problem and any Spatial Option pursued needs to stand a realistic chance of delivering the required amount of housing. Whilst Spatial Option 4 appears to be a sensible and logical option, it is suggested that, if Option 6 (Market Led Option) is not to be pursued in its entirety, the spatial strategy must give weight to market conditions and the delivery of houses previously over the adopted LDP period.

The number of units built on the allocated sites in St Clears has been considerably higher than in the other ALDP Service Centres, demonstrating that St Clears is an attractive location for growth and is capable of delivering housing and accordingly it is suggested that the Spatial Options reflect this. It also shows that there is only a limited amount of allocated sites left within St Clears and, if a more market-led approach is to be taken, the need for a review of existing and the identification of new allocations is required.

**Response / Recommendation**

**Comments Noted - Each settlement within the settlement hierarchy will be assessed in light of their potential for accommodating and delivering future development. Consideration will be given to those sites which have failed to deliver in the adopted LDP. This will be considered as part of the emerging evidence base leading into the publication of the Deposit LDP.**

**Representation(s)****Nature****532** Mr Owen Williams [3158]**Object****Summary:**

- Using the City-Region Deal as a basis for economic and population growth is risky and unsupported by evidence
- Ignorance of the likely consequences of Brexit on population growth/movement and the housing market and how this may affect competition from other areas
- Failure to prove the plan will deliver (key test of soundness)
- Alternative and more realistic growth forecast required
- Forecasts have been revised downwards by at least one previous Planning Inspector

**Change To Plan Sought:**

- Revise the population growth forecast used as a basis for the Preferred Option downwards to ensure a more realistic and deliverable plan

**Response / Recommendation**

**The respondents make the assertion that an alternative more deliverable forecast is required. However this is based solely upon a perception that growth will shrink and investment delivery will not take place. Indeed it should be recognised that forecasting a lower growth as suggested would run contrary to the strategic and regeneration objectives both of the Council and the Region. In this respect the LDP must have regard to other Plans and strategies with a failure to do so not only rendering the Plan unsound, but also potentially resulting in these plans and strategies being in conflict with the Development Plan.**

**The Preferred Strategy is in this regard not only reflective of these plans and strategies and government backed investments but is as a result based on evidence around projected growth. The omission of the growth projected from investments such as the City Deal would in themselves not be evidence based as they would omit known potential for growth.**

**The potential implications from changes in circumstance will be monitored as the Plan progresses through its preparatory process. It should also be noted that the Deposit LDP will include a monitoring framework which will measure the success or otherwise of the LDP in delivering its policies and proposals.**

**The LDP will be subject to further evidence as part of the preparation of the Deposit Plan.**

<i>Representation(s)</i>	<i>Nature</i>
<b>1073</b> Cai Parry [822]	<b>Object</b>

*Summary:*

Contradiction between Preferred Option and Planning Policy Wales (Edition 10) in that it seeks to direct development to smaller settlements, which are less sustainable and would increase reliance upon the private car.

The Preferred Option should be amended to confirm that new development will be apportioned in accordance with the role of each settlement (i.e. higher proportions within the 'Principal Centres' and lower proportions within the 'Sustainable Villages' and 'Rural Villages').

*Change To Plan Sought:*

The Preferred Option should be amended to confirm that new development will be apportioned in accordance with the role of each settlement (i.e. higher proportions within the 'Principal Centres' and lower proportions within the 'Sustainable Villages' and 'Rural Villages').

***Response / Recommendation***

**Comments Noted. The Council considers that the indicative apportionment of residential growth by tier is based on a sound and reasonable assessment, by identifying a number of factors which influence it. However, the indicative apportionment affords an allowance in to be made; the level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP.**

<i>Representation(s)</i>	<i>Nature</i>
<b>10</b> Carmarthenshire County Council (Mr Stuart Walters) [2345]	<b>Support</b>

*Summary:*

In considering your strategic growth and spatial options it is reassuring to see that you had consideration to a number of key Economic Development policy documents including the Council's Strategic Regeneration Plan 2015 - 2030 - Transformations and the Swansea Bay City Deal. These documents form the basis for our activity in Economic Development and the fact they are referenced throughout the consultation document provides a confidence that the plan that is emerging through the LDP process will be strategically aligned to that of the work of Economic Development. The preferred option of "Balanced Community and Sustainable Growth Strategy" is seen as a positive option in that this hybrid option retains an approach which will seek to be responsive in how it assigns growth, to urban and rural areas. The option also looks to:

\* Recognise and reflect investment and economic benefits to the County and its communities through the City Deal, and other economic opportunities,

\* It will seek to provide opportunities for rural areas ensuring the diversity of the County and communities is recognised;

\* It will acknowledge that in delivering sustainable growth that it needs to be supported by the availability of a range of appropriate infrastructure;

\* It will recognise that growth should be deliverable and orientated to a community's needs and market demand.

These points are welcomed as they are supportive of potential investment and growth in the county. I believe this approach is essential to ensure that any private sector interest in the county has a planning framework that is supportive subject to the development being proportionate and relevant to the respective settlement.

***Response / Recommendation***

**Support welcomed.**

<i>Representation(s)</i>	<i>Nature</i>
<b>696</b> Lynda James [3039]	<b>Support</b>

*Summary:*

Seems the most balanced approach for sustaining and building the economy whilst retaining the sustainability of rural areas and the role they play in tourism.

***Response / Recommendation***

**Noted, site specific matters are considered as part of the candidate site process.**

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<i>Representation(s)</i>		<i>Nature</i>
<b>543</b>	<b>RSAl [3167]</b>	<b>Support</b>
<i>Agent: Lichfields (Mr Arwel Evans) [3166]</i>		
<i>Summary:</i>		
Support the use of the hybrid option but note that there is a need to take into account the market and whether the locations identified will be deliverable. The Swansea Bay City Region is also important and it is not appropriate to ignore the fact that some areas of Carmarthenshire are in close proximity to Swansea and the employment opportunities that the City provides.		

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**Response / Recommendation**

**Support welcomed.**

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<i>Representation(s)</i>		<i>Nature</i>
<b>2021</b>	<b>Swallow Investments Limited [3995]</b>	<b>Support</b>
<i>Summary:</i>		
Regarding Spatial Options, paragraph 9.55 of the LDP confirms a preferred 'Balanced Community and Sustainable Growth Strategy', reflecting the role and function of the County's settlements in directing growth to the most sustainable locations, whilst recognising the need to deliver opportunities in the County's rural areas.		
My client supports the LDP's preferred Strategic Growth and Spatial Options - they will deliver new housing in line with requirements and new jobs to match the same; and represent an optimistic, though not unrealistic set of assumptions and aspirations, geared towards encouraging housing and economic growth in the County over the LDP period.		

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**Response / Recommendation**

**Support welcomed.**

## Section 10. A New Strategy

### Section 10. A New Strategy

**Representation(s)**

**Nature**

**1636** Welsh Government (Mr Mark Newey) [13]

**Comment**

*Summary:*

**Growth Levels: Homes & Jobs**

The authority has explored six population based growth scenarios and two employment-led scenarios. The authority has concluded the WG-2014 based projections would result in low levels of housing growth impacting negatively on demographic change (population decline) and ability to support economic growth. The 2014-based Principal and 10 year migration variant projections would result in a dwelling requirement of 3,367 and 6,542 respectively. The Council's preferred growth option is 'PG Long Term' which is predicated on significant internal and international migration flow assumptions averaging 1,423 persons pa for the sixteen year period 2001/02-2016/17. This period takes into account the high migration levels prior to 2008, and lower net migration following the recession. This is particularly relevant in this context as deaths exceed births; net migration being the dominant driver of population change. The PG Long Term Scenario results in a dwelling requirement of 9,887 dwellings (659 p/a) over the plan period. This is based on a 3.4% vacancy rate (VR) (adjusted from 6.3% Census VR) which takes into account recent data on second and empty homes. This is a deviation of 6,520 dwellings above the WG-2014 based principal projection and 3,345 dwellings above the 10-year migration variant. The proposed housing requirement of 9,887 is a substantial reduction of 5,310 dwellings from a requirement of 15,197 homes in the current adopted plan.

The evidence also explains that the jobs led scenario(s) tested would result in a requirement for 17,000 - 20,000 homes over the plan period. The Council has stated that this would result in an undeliverable and unsustainable growth strategy. Recent housing completions based on 10 year average JHLAs figures are approximately 500 d/pa. In summary, the Council has chosen a demographic led scenario that will contribute to the delivery of the Council's economic aspirations. The population increase targeted by the PG Long Term Scenario would result in supporting the creation of 5,295 jobs (353 p/a) over the plan period. The authority must fully justify/evidence that the growth levels are directed to the most sustainable places, related to the scale and location of housing need, not impacting negatively on the Welsh language and is realistic and deliverable. You should also demonstrate the growth strategy is compatible with the aspirations of neighbouring authorities and provides the most sustainable locations for growth for the wider area. See comments on spatial strategy.

**Response / Recommendation**

**Noted. The scale and distribution of growth will be subject to further evidencing as part of the preparation of the Deposit LDP including its distribution.**

**Matters in relation to the Welsh language will be considered as part of the LDP's evidence base and within the Sustainability Appraisal. See representation 1647.**

**Representation(s)**

**Nature**

**1640** Welsh Government (Mr Mark Newey) [13]

**Comment**

**Summary:**

Preferred Strategy - The Council has concluded through the Sustainability Appraisal (SA) that a Hybrid Option - 'Balanced Community and Sustainable Growth Strategy' is the most appropriate. This option has been subject to an SA (SA, section 4.5) and is the 'Preferred Strategy'. The Preferred Strategy incorporates the core elements from Options, 2, 4, 5 and 6 which are summarised as follows:

- Growth is assigned to urban areas, while also recognising the role and function of rural settlements
- Reflects investment opportunities and economic benefits afforded to the County through the City Deal.
- Recognised that sustainable growth needs to be supported by the availability and range of infrastructure.
- Growth should also be deliverable and oriented to community need and market demand.

Further clarity is required on the spatial outcome of the Preferred Strategy. The SA highlights that the negative implications of Option 4 are that it could result in a disproportionate amount of development in unsustainable locations, generating significant additional car journeys. In the absence of a LHMA it is also unclear how the Preferred Strategy has been influenced by the level and location of housing need. The Hybrid Option and its spatial distribution requires further justification specifically; how it will deliver affordable housing, employment growth, reduced commuting, relates to the sustainable transport hierarchy (including active travel) infrastructure, minimises air pollution and potential negative impacts on the Welsh Language. These should be considered in light of 'future proofing' and how technology may shape how places function in the future, taking account of digital connections, telecoms, low emission vehicles and the associated benefits on movement patterns.

**Response / Recommendation**

**Noted. The scale and distribution of growth will be subject to further evidencing as part of the preparation of the Deposit LDP - including the proportions allocated to the respective tiers within the hierarchy. Further details in respect of the implications of option 4 will be further considered as the detail associated with the preparation of the Deposit LDP emerges. The Council recognises the importance, and role, of an up to date Local Housing Market Assessment (LHMA) and is currently working with authorities across the region to prepare an up to date LHMA. The LHMA will inform the preparation of the Deposit LDP.**



**Representation(s)**

**Nature**

**1646 Welsh Government (Mr Mark Newey) [13]**

**Comment**

**Summary:**

The delivery of the strategy is reliant upon the authority allocating sites which are broadly viable, deliverable and in accordance with the settlement strategy. The Draft Manual (Ed 3) Chapter 5: Preparing an LDP (Core Issues) sets out the key issues that must be addressed. The Council should ensure that the Deposit Plan has covered all relevant elements, with particular attention to the de-risking checklist.

To demonstrate delivery and implementation, the Deposit plan must be underpinned by viability work, an infrastructure plan and include a robust housing trajectory (included as an Annex within the plan) and a housing land supply table.

With the exception of the two strategic sites, the plan is completely silent on the allocations (housing or employment) required to deliver the strategy. There is no indication or analysis of 'key' candidate sites, nor of the existing allocations and their relevance or future status going forward. There is no assessment in broad terms of the current land bank, windfall and small sites that may come forward. Allocated sites should only be 'rolled forward' in exceptional circumstances where there is clear and robust evidence that they can be delivered. Site specific viability work, including detailed articulation of timing and phasing, costs, and infrastructure requirements including the preparation of Statements of Common Ground will be necessary to demonstrate the delivery of the plan.

The Preferred Strategy identifies two strategic sites (Policy SP5); Yr Egin Creative Cluster in Carmarthen and the Llanelli Well-being and Life Sciences project which are both components of the Swansea Bay City deal. The Deposit plan must demonstrate deliverability of both individual sites and in combination, together with Statement of Common Ground with developers. The Deposit Plan should set out site specific details for key allocations including schematic frameworks containing information on viability, general phasing timescales, key infrastructure requirements and evidence of commitment from developers.

A key issue highlighted in the Councils evidence base (Spatial Options Topic Paper, para 8.9) is that completions/sites did not come forward as anticipated in the more sustainable settlement tiers which suggests that completions have been occurring in the least sustainable areas. This has been a major shortcoming of the existing plan that should not be replicated in the revised LDP.

Finally, the Council is proposing a flexibility allowance of 6% (593 units) to be added to the housing requirement. Further evidence is required as to why 6% is appropriate, and how it relates to all housing components and their delivery and phasing over the plan. A 6% figure appears low in the context of the Welsh Average (10%) and the more rural nature / developer profile prevalent within Carmarthenshire.

**Response / Recommendation**

**Noted. The Council is aware of the need for the Plan to contain viable and deliverable sites and matters relation to their suitability and identification will be considered as part of the preparation of the Deposit LDP. Attention is drawn to the Candidate Site process, and whilst the respondent's points are noted the submission of 926 candidate sites is a figure beyond that generally anticipated and in itself presents notable challenges in terms of analysis. However, an initial assessment of Candidate Sites has been undertaken and is available on the Council's website. This will be further developed as the preparation of the Plan progresses and as the sites are assessed.**

**The need for clarity in respect of the current landbank, windfall, small sites and future deliverable allocations is recognised and will be considered as part of the preparation of the Deposit LDP.**

**Further evidence in respect of the flexibility allowance will be provided as part of the preparation of the Deposit LDP.**

**The reference to the requirements of the Local Development Manual Edition 3 is noted and will be appropriately considered as part of the preparation of the Deposit Plan. However, it should be noted that Edition 3 of the Manual at the time of writing is pending publication and as such could not be considered in the preparation of the Preferred Strategy.**





**Representation(s)****Nature****2421** Dyfodol (J W Thomas) [563]**Object****Summary:**

The Respondent raises concerns regarding the economic information and theories which underpin the level of housing need identified. The comments make particular reference to the current economic situation and potential weaknesses.

**Response / Recommendation**

**Comments noted. Further evidence will be produced to inform the economic needs of the County and its impacts upon the County's housing needs.**

**Representation(s)****Nature****2422** Dyfodol (J W Thomas) [563]**Object****Summary:**

The respondent raises concerns over the level of housing growth identified in the Preferred Strategy and considers that this level of housing is not needed. The respondent notes that there is insufficient information in the Preferred Strategy to evidence the level of proposed housing growth. The respondent also notes a preference for the LDP to focus on job creation and infrastructure rather than housing growth. Furthermore, the respondent considers that there is insufficient information to assess the impacts of housing growth upon the Welsh language.

**Response / Recommendation**

**Comments are noted. There is information regarding the identification of housing growth levels in the supporting evidence. The LDP aims to enable and facilitate job creation in the County and emphasises the need for suitable infrastructure to support development. The Council considers that a rational approach which supports both housing, infrastructure and job creation can be achieved through this strategy and considers that these 3 elements are not mutually exclusive but rather are all key considerations of the preferred strategy.**

**The SA/SEA assessed the anticipated impacts of the Preferred Strategy upon the Welsh language and the Deposit Revised Local Development Plan will be informed by a Welsh Impact Assessment.**

**Representation(s)****Nature****1748** City & County of Swansea (Mr Tom Evans) [3761]**Support****Summary:**

Swansea Council are broadly supportive of the vision, objectives and chosen growth and spatial strategy of the Preferred Strategy

**Response / Recommendation**

**Support welcomed.**



**Representation(s)**

**Nature**

**1673** Pembrokehire Coast National Park Authority (Ms Martina Dunne) [2326] **Support**

*Summary:*

The strategy is similar in approach to the Pembrokehire Coast National Park LDP with growth focused in the higher tiers.

The attached table shows the compatibility of approach in both Plans.

Exceptional land release for affordable housing: include the option of releases higher up in the hierarchy to help meet need.

Affordable Housing Contributions: clarify if contributions will be required for sites below the threshold for provision on site.

Employment: It will be helpful to see the approach to be taken to employment on edge of settlement/in the countryside.

Viability: Viability when providing affordable housing may influence the 5 or more threshold.

**Response / Recommendation**

**Support Welcomed. The Council will continue to update its evidence base leading into the Deposit LDP and address some of the highlighted comments. Further clarification will be given to viability and affordable housing once key pieces of evidence are completed which will inform the policy content of the Deposit LDP**

**Representation(s)**

**Nature**

**1674** Pembrokehire Coast National Park Authority (Ms Martina Dunne) [2326] **Support**

*Summary:*

Support the general conformity of approach.

The Spatial Strategy commentary above sets out where there is consistency of approach on where employment undertakings can take place in the County along with notes of clarification.

The employment and economic development strategy of Carmarthenshire County Council's Preferred Strategy focusses on the Swansea Bay City Deal and looks to the local authorities east of Carmarthenshire. There is also the possibility of a Regional Strategic Economic study (which both Authorities are party to) being produced which will assist in the development of the Deposit Local Development Plan.

**Response / Recommendation**

**Support Welcomed. The Council will continue to update its evidence base leading into the Deposit LDP and address some of the highlighted comments.**

## Paragraph 10.1

### *Representation(s)*

### *Nature*

**1632** Miss Rhiannon Mathias [3656]

**Object**

#### *Summary:*

No more homes should be built except where those for the need of local people. More staff should be within the planning department because a planning application I have interest in was submitted over 7 months ago and no response received.

#### *Change To Plan Sought:*

No more homes should be built except where those for the need of local people.

### *Response / Recommendation*

**Disagree. The Plan seeks to provide a balanced level of housing growth to meet the needs of the County and its communities. A key element of such balance is the provision of, and allowance for, affordable housing and recognising local need.**

### *Representation(s)*

### *Nature*

**7** Carmarthenshire County Council (Mr Stuart Walters) [2345]

**Support**

#### *Summary:*

Overall the Division welcomes the approach of the Pre - Deposit Local Development Plan and its broad strategic principles which it has set out as its preferred strategy for Carmarthenshire up to 2033. We support the principle that the plan is built on sustainability, and the objectives contained within the Carmarthenshire Well-being Plan

### *Response / Recommendation*

**Support welcomed.**

## Paragraph 10.3

### *Representation(s)*

### *Nature*

**8** Carmarthenshire County Council (Mr Stuart Walters) [2345]

**Support**

#### *Summary:*

It is positive to see that that the plan recognises the spatial differences across the county. Recognition that a one size policy solution doesn't fit all, and that policies will need to reflect different circumstances depending upon their area is welcomed.

### *Response / Recommendation*

**Support welcomed.**

<i>Representation(s)</i>	<i>Nature</i>
<b>11</b> Carmarthenshire County Council (Mr Stuart Walters) [2345]	<b>Support</b>

**Summary:**

The new strategy recognises the diverse nature of the county and the settlement hierarchy and six clusters reflects the function, role and diversity that exists within and between the differing areas of the county. The recognition of the strategic growth areas of Llanelli, Ammanford/ Cross Hands, and Carmarthen is supported and their continued growth is key for prosperity for the county. It is good to see a balance with the other areas of the county most notably the rural market towns highlighted for local growth and diversification with growth reflecting their community needs and aspirations. The "allocation of sites and the use of policies will provide a framework for the provision of employment and job creation opportunities", coupled with statements such as "seek to provide a positive approach to help these areas meet their full potential" is fully supported. This together with mention of "a responsive policy approach" in the context of addressing county variations is most welcomed and offers a platform for a planning framework which can meet the needs of future growth aspirations that this Division sees for the county.

**Response / Recommendation**

**Support welcomed.**

**Paragraph 10.5**

<i>Representation(s)</i>	<i>Nature</i>
<b>1459</b> Cllrs Price & Vaughan-Owen [3546]	<b>Comment</b>

**Summary:**

Over the past decade, the Gorslas ward, along with many other areas within the Ammanford/Cross Hands growth area, has seen significant housing development, which have had an impact on villages within the Ward. We are keen to ensure that any sites that progress from this stage, meet the local need for housing and for business. It is vital that any developments will not have a negative impact on education establishments, community facilities, health centres and the local environment.

**Response / Recommendation**

**Comments noted. The Plan will be based on a robust evidence base which provides clarification on the matters listed within the representation. The Site Assessment Methodology will allow for the consideration of housing sites to be based on a robust and consistent approach. The Sustainability Appraisal will have a key role in assessing the Plan's sustainability credentials.**

**Deliverable Growth**

<i>Representation(s)</i>	<i>Nature</i>
<b>2425</b> Dyfodol (J W Thomas) [563]	<b>Comment</b>

**Summary:**

The Respondent states a number of facts in respect of the Plan's provision for new homes.

**Response / Recommendation**

**Comments noted. The Plan and its provision for homes is supported by robust evidence and is been informed by consultation - not least the Key Stakeholder Forum - as well as other plans and strategies.**

## Paragraph 10.12

### *Representation(s)*

### *Nature*

**1469** Cllrs Price & Vaughan-Owen [3546] **Comment**

#### *Summary:*

A robust evidence base is necessary to ensure developments reflect the genuine need for local housing, including the correct mix of affordable housing, Social housing, family homes and housing suitable for an ageing population.

Any housing sites should be size appropriate and not constitute over development within villages. Sites progressing from this stage, should consider the effect on current housing sites and be sensitive to negatively impacting local residents.

### *Response / Recommendation*

**Comments noted. The Plan will be based on a robust evidence base which provides clarification on the matters listed within the representation. The Site Assessment Methodology will allow for the consideration of housing sites to be based on a robust and consistent approach. The Sustainability Appraisal will have a key role in assessing the Plan's sustainability credentials.**

## Paragraph 10.18

### *Representation(s)*

### *Nature*

**1686** Natural Resources Wales (Miss Sharon Luke) [3253] **Support**

#### *Summary:*

We welcome the inclusion of Section 10.18 which notes that the LDP seeks to put a policy framework in place which tackles the causes and effects of climate change within the communities through the adoption of sustainable principles and development.

### *Response / Recommendation*

**Support welcomed.**

### *Representation(s)*

### *Nature*

**815** Natural Resources Wales (Miss Sharon Luke) [3253] **Support**

#### *Summary:*

We welcome the inclusion of Section 10.18 which notes that the LDP seeks to put a policy framework in place which tackles the causes and effects of climate change within the communities through the adoption of sustainable principles and development.

### *Response / Recommendation*

**Support welcomed**

**Paragraph 10.19**

**Representation(s)**

**Nature**

**267** RWE Innogy UK Ltd (Miss Eleri Davies) [471]

**Object**

*Summary:*

Under the heading entitled 'Sustainable Development, Well-being and Climate Change' in 'A New Strategy' (Section 10) there is no reference to renewable energy.

*Change To Plan Sought:*

As well as 'minimising energy demand and consumption', this section should include reference to the critical role that 'renewable energy' also plays in the context of 'Sustainable Development, Well-being and Climate Change' in 'A New Strategy' (Section 10).

**Response / Recommendation**

**Agree, add reference to renewable energy in the second bullet point of paragraph 10.19.**

**Representation(s)**

**Nature**

**1687** Natural Resources Wales (Miss Sharon Luke) [3253]

**Support**

*Summary:*

We support the principles of sustainability, noted in Section 10.19, that the LDP will promote.

**Response / Recommendation**

**Support welcomed**

**Representation(s)**

**Nature**

**816** Natural Resources Wales (Miss Sharon Luke) [3253]

**Support**

*Summary:*

We support the principles of sustainability, noted in Section 10.19, that the LDP will promote.

**Response / Recommendation**

**Support welcomed**

**Representation(s)**

**Nature**

**1654** Simon Chaffe [855]

**Support**

*Summary:*

Para 10.19, bullet 2 - SUPPORT  
'including the promotion of the efficient use of resources including directing development to previously developed land wherever possible;'

**Response / Recommendation**

**Support welcomed.**

## Paragraph 10.20

### *Representation(s)*

### *Nature*

**1462** Cllrs Price & Vaughan-Owen [3546] **Comment**

#### *Summary:*

It is vital that all future development ensure the distinctiveness and character of our villages and impacts positively on the Welsh language and culture.

To ensure communities remain vibrant, it is important, that any developments are supported by the necessary public transport infrastructure so that our villages do not develop as commuting settlements.

We welcome the "Balanced Community and Sustainable Growth Strategy". We would very much like to see the sustainable distribution of growth throughout the county, which includes the rural communities of Carmarthenshire

### *Response / Recommendation*

**Comments noted / support welcomed. The Balanced Community and Sustainable Growth Strategy seeks to provide a platform for the delivery of the Plan's Vision and Strategic Objectives, which include a recognition of the important role of rural areas. The Sustainability Appraisal will have a key role in assessing the Plan's sustainability credentials - not least the availability of public transport.**

### *Representation(s)*

### *Nature*

**268** RWE Innogy UK Ltd (Miss Eleri Davies) [471] **Object**

#### *Summary:*

The 'key components' of the 'New Strategy' fails to mention renewable energy, a critical component in the context of 'Sustainable Development, Well-being and Climate Change'.

#### *Change To Plan Sought:*

Include 'renewable energy' in the 'key components' of the 'New Strategy'.

### *Response / Recommendation*

**Agree. Include reference to Renewable Energy within paragraph 10.20 as follows:  
'To make appropriate provision for renewable energy within the County'**

### *Representation(s)*

### *Nature*

**12** Carmarthenshire County Council (Mr Stuart Walters) [2345] **Support**

#### *Summary:*

The LDP growth plan based upon the delivery of 9,887 homes over the plan period seems rational and achievable, whilst the delivery of 5,295 jobs over the plan period is consistent with the aspirations of the Council's Strategic Regeneration Plan 2015 - 2030 - Transformations, which has a target of 5,000 jobs by the end of 2030, and again seems realistic and deliverable over the plan period. Overall the economic development elements of the key components of the new strategy are welcomed.

### *Response / Recommendation*

**Support welcomed.**

<i>Representation(s)</i>	<i>Nature</i>
<b>1655</b> Simon Chaffe [855]	<b>Support</b>
<i>Summary:</i>	
Para 10.20, bullet 13 - SUPPORT 'Recognise the contribution of 'previously developed land' and utilises it as appropriate whilst recognising the County's largely rural context;'	

***Response / Recommendation***

**Support welcomed.**

**Figure 4: Key Diagram**

<i>Representation(s)</i>	<i>Nature</i>
<b>1753</b> City & County of Swansea (Mr Tom Evans) [3761]	<b>Comment</b>
<i>Summary:</i>	
Preferred Strategy Key Diagram: - We suggest that the key diagram could helpfully be amended to clearly show the hierarchy of the road network and M4 junctions in order to aid understanding of the relationship between the road network and key settlements & site allocations. The legend could also be clarified to show the names of each of the clusters, and to identify neighbouring local authorities.	

***Response / Recommendation***

**Comments noted and proposed changes agreed in part. The Key diagram of the Preferred Strategy seeks to provide an overview of the County at a strategic level. The policies and provisions of the Deposit LDP will provide detail with regards to the hierarchy of the road network and M4 junctions in order to aid understanding of the relationship between the road network and key settlements & site allocations. It is agreed that the legend of the Key diagram should be clarified to show the names of each of the clusters, and to identify neighbouring local authorities - and this will be done as part of the preparation of the deposit LDP.**

## Section 11. Strategic Policies

### Paragraph 11.6

#### Representation(s)

#### Nature

**817** Natural Resources Wales (Miss Sharon Luke) [3253] **Comment**

#### Summary:

We welcome the acknowledgment within Section 11.6 to work closely with partners, infrastructure providers, developers etc. in delivering the plan.

#### Response / Recommendation

**Comments noted / support welcomed. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard.**

### Strategic Policy - SP1

#### Representation(s)

#### Nature

**1644** Welsh Government (Mr Mark Newey) [13] **Comment**

#### Summary:

Policy SP1 supports the delivery of approximately 5,300 jobs, further evidence and explanation is required to explain how and where the level of job growth will be delivered, including both strategic and non strategic allocations. It is unclear what the level of employment provision is and for what sector and how this translates into a land requirement for employment uses. The current employment evidence base is inconsistent and unclear. The plan is currently silent on the type and location of key employment sites required to deliver the strategy. Further explanation is also required on how all opportunities arising from the Swansea Bay City Region have been taken into account as part of the economic strategy.

The Deposit Plan should:

- provide greater articulation on the link between the plan's housing requirement and target for 5,300 jobs to ensure broad alignment in economic activity and labour force projections and reduce the need for commuting;
- identify an employment (ha) / job target and buffer;
- identify spatial allocations to meet identified need including broad timing and phasing and defining the land use by Use Class;
- if appropriate, include a new policy to protect and identify key employment sites to safeguard for future employment use;
- include a policy to support alternative uses on existing employment sites not safeguarded;
- explain how allocated sites will be delivered, especially key allocations; and policies to promote and sustain the rural economy.

#### Response / Recommendation

**See response to representation 1645.**



**Representation(s)****Nature****1783 Mr John Morris [3777]****Object****Agent: LRM Planning (Mr. Michael Rees) [3002]****Summary:**

It is clearly a major requirement of PPW10 that great importance is placed upon the provision of homes, indeed, sustainable places cannot be facilitated without adequate provision. In this regard, PPW 10 recognizes the importance of a home to people's lives and indicates that Authorities must:

- \* identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures;
- \* enable provision of a range of well-designed, energy efficient, good quality market and affordable housing that will contribute to the creation of sustainable places; and
- \* focus on the delivery of the identified housing requirement and the related land supply.

Accordingly, it is important that an appropriate supply of homes is identified. As noted above, we are concerned that the revised requirement will not address key issues raised nor achieve the overarching aims of the Plan or its objectives. It is our view that it should be more aspirational and the hybrid option should lean towards higher job growth and economic development.

Notwithstanding our views on the level growth sought, it is clearly the case that based on the favoured option and given the issues identified within the LDP there are two key considerations that are inter related:

1. Flexibility allowance: The current level of flexibility (3.7%) was plainly insufficient, a greater level could have resulted in supply problems being addressed at an earlier stage.

Indeed, other Authorities have tended to lie between 10% to 20%, accordingly we are of the view that at least 15% should be used. This would reflect the fact that a number of the large strategic sites suffer from significant environmental & physical constraints and may not be brought forward.

A flexibility allowance of 15% would result in a need to identify a supply pool of at least 11,370 dwellings that would be available and deliverable.

2. Delivery: Given the shortfall in supply it will be problematic to simply roll the existing supply pool forward to suit a lower housing requirement. Indeed, whilst this might prima facie provide a 5 year supply, it will not address the core issues nor meet the requirements of PPW (in terms of placemaking) and implement the aspirations. It will simply mean that the existing trends are carried

forward. There are over 4000 dwellings in category 4 of the JHLAS, this is a considerable number that have failed to deliver within the LDP timeframe to 2021. It is strongly our view that a considerable number of these ought not be carried forward in a review. We await the findings of the review of these sites in terms of viability and delivery. We would accept that if a large number of these sites were replaced with new allocations then our concerns over flexibility may be alleviated.

**Response / Recommendation**

**Comments Noted - The level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP. The comment relating to existing sites is also noted, and the need for clarity in respect of the current allocated sites is recognised and will be considered as part of the preparation of the Deposit LDP.**

**Representation(s)****Nature****549 RSAI [3167]****Object****Agent: Lichfields (Mr Arwel Evans) [3166]****Summary:**

Question whether using past build out rates is appropriate given depressed housebuilding over last 10 years.

**Change To Plan Sought:**

Question the basis of using past build rates to inform the housing requirement and consider that a more aspirational outlook should be utilised which would in turn support a higher level of employment growth.

**Response / Recommendation**

**Disagree - The preferred projection affords an allowance in the potential uplift on the existing deliverability of sites and offers an opportunity to provide a positive mechanism for future growth should the economy grow. The level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP.**

<i>Representation(s)</i>	<i>Nature</i>
<p><b>2101</b>    Union Tavern Estate [3913]</p> <p><i>Agent: Barton Willmore (Joe Ayoubkhani) [646]</i></p> <p><i>Summary:</i></p> <p>In summary, SP 1: Strategic Growth is objected to and a housing requirement in line with the existing adopted LDP should be utilised, owing to:</p> <p>a) Planning policy dictates that the Welsh Government projections should form only one element of the 'key evidence' in respect of assessing housing requirements, and that there are a number of specific contextual, policy and economic considerations which need to be accounted for in the context of Carmarthenshire;</p> <p>b) Stepping down from the current LDP level would represent a serious risk of triggering enhanced issues of affordability, which already comprises a significant pressure to the local population;</p> <p>c) Growth at current levels is required to support the construction sector (which is one of the greatest employers in Carmarthenshire); however, the current LDP does not account for the Swansea Bay City Deal. Significant housing growth (over and above current levels targeted) will be required to underpin the circa 10,000 new jobs targeted to be created within the region, a significant number of which will need to be accommodated and housed within Carmarthenshire due to the commitment for investment in the Council area.</p>	<p><b>Object</b></p>

***Response / Recommendation***

**Disagree. The Council considers that the population and household projection is based on a sound and reasonable assessment, by identifying a number of factors which influence it. Reference is made to the review report for the adopted LDP, and the Annual Monitoring Reports in relation to their findings on the deliverability of the current growth as advocated by the respondent.**

<i>Representation(s)</i>	<i>Nature</i>
<p><b>13</b>    Carmarthenshire County Council (Mr Stuart Walters) [2345]</p> <p><i>Summary:</i></p> <p>SP1 - Strategic Growth specifically refers that "The LDP will provide for the future growth of the economy and housing requirement..." and that "the strategy builds on the corporate emphasis on regeneration and the opportunities presented through the city deal....." is fully supported by the Division.</p>	<p><b>Support</b></p>

***Response / Recommendation***

**Support welcomed.**

<i>Representation(s)</i>	<i>Nature</i>
<p><b>1689</b>    Natural Resources Wales (Miss Sharon Luke) [3253]</p> <p><i>Summary:</i></p> <p>We welcome the acknowledgment within Section 11.6 to work closely with partners, infrastructure providers, developers etc in delivering the plan.</p>	<p><b>Support</b></p>

***Response / Recommendation***

**Support welcomed.**

**Representation(s)**

**Nature**

**2022 Swallow Investments Limited [3995]**

**Support**

*Summary:*

Strategic Policy SP1 reflects the LDP's preferred Strategic Growth and Spatial Options, by confirming provision of 10,480 new homes to meet a requirement of 9,887 new dwellings over the LDP period; and provision of a minimum 5,295 new jobs to provide for economic growth over the LDP period. The Policy confirms that development will be distributed in a sustainable manner, consistent with the LDP's Spatial Strategy and Settlement Hierarchy.

My client supports Strategic Policy SP1 - it sets the context for delivering new housing in line with requirements and sets the conditions to match new jobs with the same; and represents a sustainable and optimistic, though not unrealistic strategy geared towards encouraging housing and economic growth in the County over the LDP period.

**Response / Recommendation**

**Support welcomed.**



**Strategic Policy - SP2**

**Representation(s)**

**Nature**

**1754 City & County of Swansea (Mr Tom Evans) [3761]**

**Comment**

*Summary:*

Strategic Policy SP 2: Retail and Town Centres -We suggest that it would be useful for both Councils to work together to consider the impact of Carmarthenshire's retail strategy on Swansea, both in terms of impact on Swansea's highway network and retail hierarchy (particularly Swansea City Centre's role as a regional centre). We suggest that the retail strategy set out in the Swansea LDP should be considered together with the Swansea Central Area Regeneration Framework.

**Response / Recommendation**

**Comments noted. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard. The Council recognises the value of the retail industry within the region and the county and will also seek to ensure that we understand the impact of proposals in neighbouring authorities will have on Carmarthenshire's Retail provisions.**



<i>Representation(s)</i>	<i>Nature</i>
<p><b>1621</b> Kames Capital UK Active Value Property Unit Trust [3610]</p> <p><i>Agent: ROK Planning (Mr Alun Evans) [3609]</i></p> <p><b>Summary:</b></p> <p>The representations seek to demonstrate the background position regarding the specific retail centre and provide a response to (a) the proposed retail policy drafting and (b) the proposed Candidate Site allocation. A conclusion is then provided which identifies minor alterations to the proposed draft retail policy, in order that the Cambrian Way shopping centre retail offer can be optimised and secured and suggest a more flexible local plan designation for the retail centre, including intensification of the use of the floorspace at upper levels. The respondent suggests the following amendment to para 11.27:                      "We recognise that the role of town centres and traditional retail patterns is changing, as such both town centre and primary and secondary retail boundaries as identified previously will be reviewed and where appropriate revised. This recognition of the changing retail pattern and the potential for flexibility in maintaining occupancy and footfall, as part of the creation of vibrant and living environments."                      The respondent advocates the removal of the Primary and Secondary retail designations. Proposes the inclusion of the following at the end of the second paragraph of SP2:                      Within the Principal Centres, a majority of retail units should comprise A1 Retail Use, with other commercial and Town Centre Uses making up the balance of units. It is not considered appropriate to identify Primary and Secondary retail frontage in order to encourage diversity and maintain the overall economic function of the Principal Centres.</p>	<p><b>Comment</b></p>

***Response / Recommendation***

**Disagree. It is considered the policy and the supporting text makes appropriate provision for the strategic consideration of retail centres across Carmarthenshire. In this regard it should be recognised that individual centres have intrinsic characteristics and potential challenges. With this in mind the suggested changes would be prescriptive across all centres and would limit the opportunity for more detailed policies to respond specifically to the needs of a given centre.**

<i>Representation(s)</i>	<i>Nature</i>
<p><b>1768</b> Columbia Threadneedle Investments (To whom it may concern) [3771]</p> <p><b>Summary:</b></p> <p>The respondent strongly support the principle of seeking to support the deliver of new retail leisure, office, cultural facilities within defined centres. Such uses considered appropriate in shopping areas where these serve to maintain a healthy and vibrant town centre. The merging Local Plan should seek to promote a relaxation of the current adopted policy in order t provide a range of more diverse uses within town centres within Carmarthenshire.</p> <p>Accordingly, emerging detailed policies should not be overly prescriptive in terms of setting a specific percentage of number of contiguous non-A1 uses that are permissible. Rather it should look to place the onus on the applicant to demonstrate how a non-A1 use would secure the vitality and viability of the defined retail frontages and wider town centre.</p> <p>Policy should specifically include consideration of the re-use of upper floors for appropriate non-A1 uses and the introduction of flexibility for temporary or meanwhile use of vacant properties within the town centre.</p>	<p><b>Comment</b></p>

***Response / Recommendation***

**Comments Noted - Detailed consideration of the points noted by the respondent will be subject to further consideration as part of the policies and provisions of the Deposit LDP. These are not matters considered appropriate from a strategic policy context.**

**Representation(s)****Nature**

**14** Carmarthenshire County Council (Mr Stuart Walters) [2345] **Support**

**Summary:**

SP2 - Retail and Town Centres - we support the principles laid out in this policy and recognise the general pattern of provision in a traditional hierarchy of centres and the role of out of town centres. We also support the policy in that town centres need to be able to adapt to the changing nature of retailing. As a division we have many interventions and programmes that are currently in place which aims to strengthen the town centre roles and this alignment is welcomed.

**Response / Recommendation**

**Support welcomed**

**Representation(s)****Nature**

**1698** Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326] **Support**

**Summary:**

Support SP 2 Retail and Town Centres  
Both Authorities' strategies focus on the need to maintain / create vibrant and diverse town, district and local centres. Retail provision in both Authorities is identified through the retail hierarchy with Carmarthenshire's hierarchy being based on Principal Centres, Service Centres and Local Provision Centres.

**Response / Recommendation**

**Support Welcomed**

**Strategic Policy - SP3****Representation(s)****Nature**

**1675** Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326] **Comment**

**Summary:**

Housing Growth - Pembrokeshire Coast National Park Authority has no comment on the anticipated scale of growth proposed.

**Response / Recommendation**

**Comment Noted**

**Representation(s)****Nature**

**636** WYG PLANNING & ENVIRONMENT (Louise Darch) [598] **Comment**

**Summary:**

A key source in meeting the identified housing land requirement is through sites allocated for residential development within the LDP. We note these housing allocations will be identified within the specific housing policies, or included as part of mixed use allocations.

We note and welcome land adjacent to B4317 Culla Rd (candidate site ref CA0514) and land adjacent to B4317 Culla Rd roundabout (candidate site ref: CA0515) being taken forward for further detailed assessment. As set out in the respective candidate site submissions both sites are sustainably located and immediately deliverable. Both sites should be allocated for housing pursuant to Strategic Policy 3; both sites will make a valuable contribution towards meeting Carmarthenshire's future housing needs.

**Response / Recommendation**

**Noted. The site specific matters highlighted by the respondent are not subject to consideration within this Draft Preferred Strategy.**

**Representation(s)**

**Nature**

**1586** The Williams Family . [3585]

**Comment**

*Agent: Savills (Mr Nick Heard) [3216]*

**Summary:**

Wholly inadequate flexibility given the undersupply in the adopted LDP and there is a need for a buffer of a very minimum of 10% to ensure delivery.

Thorough review of sites that are allocated in the adopted LDP to consider their suitability for their continued allocation in the revised LDP.

Whilst it is understood that CCC may have aspirations for sites in St Clears to be developed there must be genuine concerns about their viability and deliverability -

Accordingly, it is suggested that they are not continued as allocations within the RLDP on the basis that deliverability has not been demonstrated.

**Response / Recommendation**

**Comments Noted. The Council as part of the LDP process are reviewing all existing housing allocations sites to identify those that are not contributing to the LDP strategy, and a wide ranging assessment is being undertaken to make sure that the most appropriate sites are allocated in the revised Plan. This will be reflected within the apportionment of sites within the each cluster and tier.**

**Representation(s)**

**Nature**

**642** Simrock Holdings Ltd [3217]

**Comment**

*Agent: Savills (Mr Nick Heard) [3216]*

**Summary:**

Whilst the increased buffer that is proposed in the revised LDP is marginally greater than in the adopted LDP, it is suggested that it is still wholly inadequate given the undersupply in the adopted LDP and there is a need for a buffer of a very minimum of 10% to ensure delivery.

**Response / Recommendation**

**Comments Noted - The level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP.**

**Representation(s)****Nature****1785 Mr John Morris [3777]****Object****Agent: LRM Planning (Mr. Michael Rees) [3002]****Summary:**

It is clearly a major requirement of PPW10 that great importance is placed upon the provision of homes, indeed, sustainable places cannot be facilitated without adequate provision. In this regard, PPW 10 recognizes the importance of a home to people's lives and indicates that Authorities must:

- \* identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures;
- \* enable provision of a range of well-designed, energy efficient, good quality market and affordable housing that will contribute to the creation of sustainable places; and
- \* focus on the delivery of the identified housing requirement and the related land supply.

Accordingly, it is important that an appropriate supply of homes is identified. As noted above, we are concerned that the revised requirement will not address key issues raised nor achieve the overarching aims of the Plan or its objectives. It is our view that it should be more aspirational and the hybrid option should lean towards higher job growth and economic development.

Notwithstanding our views on the level growth sought, it is clearly the case that based on the favoured option and given the issues identified within the LDP there are two key considerations that are inter related:

1. Flexibility allowance: The current level of flexibility (3.7%) was plainly insufficient, a greater level could have resulted in supply problems being addressed at an earlier stage.

Indeed, other Authorities have tended to lie between 10% to 20%, accordingly we are of the view that at least 15% should be used. This would reflect the fact that a number of the large strategic sites suffer from significant environmental & physical constraints and may not be brought forward.

A flexibility allowance of 15% would result in a need to identify a supply pool of at least 11,370 dwellings that would be available and deliverable.

2. Delivery: Given the shortfall in supply it will be problematic to simply roll the existing supply pool forward to suit a lower housing requirement. Indeed, whilst this might prima facie provide a 5 year supply, it will not address the core issues nor meet the requirements of PPW (in terms of placemaking) and implement the aspirations. It will simply mean that the existing trends are carried

forward. There are over 4000 dwellings in category 4 of the JHLAS, this is a considerable number that have failed to deliver within the LDP timeframe to 2021. It is strongly our view that a considerable number of these ought not be carried forward in a review. We await the findings of the review of these sites in terms of viability and delivery.

We would accept that if a large number of these sites were replaced with new allocations then our concerns over flexibility may be alleviated.

**Response / Recommendation**

**Comments Noted - The level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP. The comment relating to existing sites is also noted, and the need for clarity in respect of the current allocated sites is recognised and will be considered as part of the preparation of the Deposit LDP.**





**Representation(s)**

**Nature**

**1773 Savills (Mr Nick Heard) [3216]**

**Object**

**Agent: Savills (Mr Nick Heard) [3216]**

**Summary:**

Linked to this point, the Williams Family suggest that there is a need to undertake a thorough review of sites that are allocated in the Adopted LDP to consider their suitability for their continued allocation in the Revised LDP in light of the emphasis placed in Planning Policy Wales Edition 10 on sites being realistically deliverable and viable. This can only help Carmarthenshire County Council hit the delivery numbers that are required within the County.

In St Clears, for example, three sites ('Adjacent to Britannia Terrace', 'Adjacent to Brynheulog', and 'Adjacent to Gardde Fields') totalling 98 units are allocated in the Adopted LDP and were allocated in its predecessor, the Unitary Development Plan (UDP) which was adopted in 2006. In the case of 'Adjacent to Britannia Terrace' outline planning permission was granted in 2010 (ref. W/21675) though this has been extended on two occasions (refs. W/28769 and W/31167) whilst both the 'Adjacent to Gardde Fields' and the 'Adjacent to Brynheulog' have no relevant planning history since an outline application for residential development which was withdrawn in 2007 (12 years ago) (ref/ W/17287). This means that no units have been constructed on any of the sites.

Whilst it is understood that Carmarthenshire County Council may have aspirations for these sites to be developed there must be genuine concerns about their viability and deliverability - these factors should form part of the rigorous review of all long standing allocated sites. Accordingly, it is suggested that they are not continued as allocations within the Revised LDP on the basis that deliverability has not been demonstrated.

The RLDP's extended lifetime means that there is a requirement to identify new sites for housing. St Clears is both a highly sustainable location as reflected in its position in the settlement hierarchy (as set out in the Adopted LDP) but also the far higher level of housing delivery on allocated housing sites compared to other settlements in St Clears. Despite this, there has been little progress on three sites allocated in the Adopted LDP and questions need to be asked whether these continue to be deliverable and ultimately whether they should continue to be allocated.

**Response / Recommendation**

**Comments Noted - A detailed assessments will be undertaken on all housing allocation within the current LDP, and each settlement within the settlement hierarchy will be assessed in light of their potential for accommodating and delivering future development. This will be considered as part of the emerging evidence base leading into the publication of the Deposit LDP.**

**Representation(s)**

**Nature**

**542 RSAI [3167]**

**Object**

**Agent: Lichfields (Mr Arwel Evans) [3166]**

**Summary:**

Support not using the WG 2014 based population projections. Support in principle the fact that a more aspirational population projection has been utilised.

Question whether using past build out rates is appropriate given depressed housebuilding over last 10 years.

Object to the fact that a flexibility allowance of only 593 (5.9%) homes is set out by the Plan. Current adopted LDP had a 3.8% buffer and it is clear that this has not been sufficient to ensure that the housing requirement is met.

**Change To Plan Sought:**

We recommend that the land supply is increased so that there is at least a 10% buffer for non-delivery. This would assist the Council in meeting the housing requirement.

**Response / Recommendation**

**Disagree in part. The Council considers that the population and household projection is based on a sound and reasonable assessment, by identifying a number of factors which influence it. The preferred projection affords an allowance in the potential uplift on the existing deliverability of sites and offers an opportunity to provide a positive mechanism for future growth should the economy grow.**

**Comment Noted - The level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP.**



<i>Representation(s)</i>	<i>Nature</i>
<p><b>2103</b> Union Tavern Estate [3913]</p> <p><i>Agent: Barton Willmore (Joe Ayoubkhani) [646]</i></p> <p><i>Summary:</i></p> <p>In summary, SP 3: Providing New Homes is objected to and a housing requirement in line with the existing adopted LDP should be utilised, owing to:</p> <p>a) Planning policy dictates that the Welsh Government projections should form only one element of the 'key evidence' in respect of assessing housing requirements, and that there are a number of specific contextual, policy and economic considerations which need to be accounted for in the context of Carmarthenshire;</p> <p>b) Stepping down from the current LDP level would represent a serious risk of triggering enhanced issues of affordability, which already comprises a significant pressure to the local population;</p> <p>c) Growth at current levels is required to support the construction sector (which is one of the greatest employers in Carmarthenshire); however, the current LDP does not account for the Swansea Bay City Deal. Significant housing growth (over and above current levels targeted) will be required to underpin the circa 10,000 new jobs targeted to be created within the region, a significant number of which will need to be accommodated and housed within Carmarthenshire due to the commitment for investment in the Council area.</p>	<p><b>Object</b></p>

***Response / Recommendation***

**The Council considers that the population and household projection is based on a sound and reasonable assessment, by identifying a number of factors which influence it, including the role that the Swansea Bay City Deal will play. The preferred projection affords an allowance in the potential uplift on the existing deliverability of sites and offers an opportunity to provide a positive mechanism for future growth should the economy grow. The level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP.**

<i>Representation(s)</i>	<i>Nature</i>
<p><b>15</b> Carmarthenshire County Council (Mr Stuart Walters) [2345]</p> <p><i>Summary:</i></p> <p>We support SP3 - Providing new homes</p>	<p><b>Support</b></p>

***Response / Recommendation***

**Support welcomed.**

<i>Representation(s)</i>	<i>Nature</i>
<p><b>2023</b> Swallow Investments Limited [3995]</p> <p><i>Summary:</i></p> <p>Strategic Policy SP3 builds on Strategic Policy SP1 by confirming that in order to meet the requirement for 9,887 dwellings over the LDP period, 10,480 new dwellings will be provided between 2018-2033, in accordance with the LDP's Settlement Framework. My client supports Strategic Policy SP3 - it sets the context for delivering new housing in line with requirements, with a reasonable and realistic 'buffer' to ensure those requirements are satisfied; and therefore represents a sustainable and achievable strategy for meeting the County's housing needs over the LDP period.</p>	<p><b>Support</b></p>

***Response / Recommendation***

**Support welcomed.**

## Paragraph 11.35

**Representation(s)**

**Nature**

**1772 Savills (Mr Nick Heard) [3216]**

**Object**

*Agent: Savills (Mr Nick Heard) [3216]*

**Summary:**

Based upon the growth option selected in Section 9 of the Draft Preferred Strategy, this policy states that in order to ensure the housing requirement of 9,887 units over the Review LDP period is achieved, provision will be need to be made for 10,480 units. This equates to a buffer of 593 units or 6% of the projected population growth.

Paragraph 4.2.10 of Planning Policy Wales provides guidance on the buffer that should be used when setting housing need, stating that:

"The supply of land to meet the housing requirement proposed in a development plan must be deliverable. To achieve this, development plans must include a supply of land which delivers the identified housing requirement figure and makes a locally appropriate additional flexibility allowance for sites not coming forward during the plan period."

The Adopted LDP is based on a housing need of 15,197 (just over 1,000 a year) with a total of 15,778 units allocated equating to a buffer of 581 units or 4%. Since the adoption of the Adopted LDP, the 2018 Annual Monitoring Report (AMR) recognises that the most units delivered in a single year was 608. A number of reasons (some structural and other more local based) are identified in the AMR to explain this under delivery and these are not disputed by The Williams Family but it is also evident that the 4% buffer used was inadequate for the Adopted LDP and that there have been sites that have been allocated repeatedly in local plans despite not having come forward and not coming forward in the Adopted LDP. Whilst the increased buffer that is proposed in the Revised LDP is marginally greater than in the Adopted LDP, The Williams Family suggest that it is still wholly inadequate given the undersupply in the Adopted LDP and there is a need for a buffer of a very minimum of 10% to ensure delivery.

In terms of the amount of growth, ultimately The Williams Family welcome the use of a projection that is based on longer term trends rather than a single base date but suggest there is scope to make an allowance for favourable economic circumstances and use a substantial buffer (minimum of 10%) between need and allocations made to support delivery.

**Response / Recommendation**

**The level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP.**

**Representation(s)**

**Nature**

**1076 Cai Parry [822]**

**Object**

**Summary:**

Windfall allowances cannot be demonstrated as being deliverable and therefore should form part of the flexibility allowance only.

**Change To Plan Sought:**

References to windfalls should be deleted from paragraph 11.35.

**Response / Recommendation**

**Noted. The windfall and flexibility allowances will be calculated and identified within the Deposit Plan in a manner consistent with Welsh Government guidance.**

## Strategic Policy - SP4

### Representation(s)

### Nature

1648 Welsh Government (Mr Mark Newey) [13]

Comment

*Summary:*

The absence of an up to date Local Housing Market Assessment (LHMA) is a major shortcoming as it is a core piece of baseline evidence influencing the scale, type and location of housing. The LHMA is of critical importance to demonstrate that the proposed level and type of housing reflects local needs. Linkages to sustainability issues should also be reconciled; i.e. why it is, or is not appropriate to locate affordable housing in less sustainable communities. At present it is unclear how the distribution of growth relates to areas where it is viable or needed? Whilst the authority refers to an affordable housing target in para 11.42 which mentions the Affordable Housing Delivery Plan 2016-2020 target of 1,000 homes, Policy SP4 'Affordable Homes should set a target for affordable homes. The LDP Manual (edition 3) sets out detailed guidance on viability and includes a checklist for developing an affordable housing policy framework.

### Response / Recommendation

**Noted. The Council recognises the importance, and role, of an up to date Local Housing Market Assessment (LHMA). The Council is currently working with authorities across the region to prepare an up to date LHMA. The LHMA will inform the preparation of the Deposit LDP. Policy SP4 will as part of the Deposit LDP set a minimum target for affordable homes. The reference to the requirements of the Local Development Manual Edition 3 is noted and will be appropriately considered as part of the preparation of the Deposit Plan. However, it should be noted that Edition 3 of the Manual at the time of writing is pending publication and as such could not be considered in the preparation of the Preferred Strategy.**

### Representation(s)

### Nature

1788 Mr John Morris [3777]

Comment

*Agent: LRM Planning (Mr. Michael Rees) [3002]*

*Summary:*

We note that through the LDP there was a significant identified housing need (73% of the overall housing requirement). Given the shortfall within the LDP period and under delivery, absent any updated need survey, it seems clear that the existing level of need can only be increased. Indeed, the most recent housing market assessment indicates that there will be a shortfall of 1,900 affordable homes a year for the next five years between 2015 and 2020. This includes 400 of these that are considered within the highest housing need and in total over the period equates 9,500. As such it seems that the overarching housing need figure is likely to exacerbate issues of affordability. These issues were identified in 2009, were not addressed within the LDP and are unlikely to be addressed in the current approach, absent an overhaul of under-deliverable sites and identification of new allocations that can improve delivery.

### Response / Recommendation

**Noted. The Council recognises the importance, and role, of an up to date Local Housing Market Assessment (LHMA). The Council is currently working with authorities across the region to prepare an up to date LHMA. The LHMA will inform the preparation of the Deposit LDP. The comment relating to existing sites is also noted, and the need for clarity in respect of deliverable sites is recognised and will be considered as part of the preparation of the Deposit LDP.**

<i>Representation(s)</i>	<i>Nature</i>
<b>2417</b> Dyfodol (J W Thomas) [563]	<b>Object</b>

**Summary:**

In discussing the Authority's Cartrefi Croeso Scheme the respondent raises concerns that people from outside of the County may take advantage of the scheme and in turn negatively impact upon the Welsh language in Carmarthenshire.

**Response / Recommendation**

**Comments are noted. Policies will be developed in the Deposit Revised Local Development Plan to guide the provision of affordable housing to meet local needs. Furthermore, policies will be developed to safeguard the Welsh language.**

<i>Representation(s)</i>	<i>Nature</i>
<b>16</b> Carmarthenshire County Council (Mr Stuart Walters) [2345]	<b>Support</b>

**Summary:**

We support SP4 - Affordable Homes

**Response / Recommendation**

**Support welcomed.**

<i>Representation(s)</i>	<i>Nature</i>
<b>1683</b> Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326]	<b>Support</b>

**Summary:**

Affordable Housing

Support in principal Strategic Policy SP4

Both authorities are party to a joint commission with neighbouring authorities for the preparation of a replacement Housing Market Assessment - due for delivery in 2019.

Both Authorities are also part of a joint commission on assessing viability in the region.

**Response / Recommendation**

**Support Welcomed**

**Strategic Policy - SP5**

<i>Representation(s)</i>	<i>Nature</i>
<b>1755</b> City & County of Swansea (Mr Tom Evans) [3761]	<b>Comment</b>

**Summary:**

Strategic policy SP5- Strategic Site allocations -We suggest that both Councils work together to utilise the Swansea Strategic Transport Model to understand the impact of Carmarthenshire/s Strategic Site allocations on the highway network.

**Response / Recommendation**

**Comments noted. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard.**

<i>Representation(s)</i>	<i>Nature</i>
<b>1690</b> Natural Resources Wales (Miss Sharon Luke) [3253]	<b>Comment</b>

*Summary:*

We have no comment to make on Policy SP5 as we are involved with both the Llanelli Life Science and Well-being Village and Yr Egin in Carmarthen through the planning process. We will continue to work with your Authority in progressing the development of these sites.

*Response / Recommendation*

Comments noted.

<i>Representation(s)</i>	<i>Nature</i>
<b>818</b> Natural Resources Wales (Miss Sharon Luke) [3253]	<b>Comment</b>

*Summary:*

We have no comment to make on Policy SP5 as we are involved with both the Llanelli Life Science and Well-being Village and Yr Egin in Carmarthen through the planning process. We will continue to work with your Authority in progressing the development of these sites.

*Response / Recommendation*

Comments noted

<i>Representation(s)</i>	<i>Nature</i>
<b>17</b> Carmarthenshire County Council (Mr Stuart Walters) [2345]	<b>Support</b>

*Summary:*

SP5 - Strategic Sites, The fact that there is no reference to two important employment sites from an Economic Development perspective, these being 1) Cross Hands East Strategic Employment Site - a site currently being developed for employment use, which has secured planning consent, delivered phase 1 with phase 2 to be delivered over the next few years; 2) Pibwrlwyd - a site in Carmarthen which has been earmarked for employment use for a number of years and is seen as strategically important for the future growth of Carmarthen and the wider economy of Carmarthenshire. We would be grateful if consideration could be given to include these two sites moving forward.

*Response / Recommendation*

**Noted. The sites have been not been identified as strategic in terms of their potential for inclusion within the Revised LDP.**

**However, it should be noted that whilst not considered strategic, namely essential to the delivery of the Revised LDP, they will be considered for potential inclusion within the Deposit LDP. In this respect, it is noted that Pibwrlwyd, along with an extension to Cross Hands East, have been submitted as candidate sites representations.**

<i>Representation(s)</i>	<i>Nature</i>
<b>1078</b> Cai Parry [822]	<b>Support</b>

*Summary:*

Support the allocation of two strategic employment sites. New housing should be located in close proximity to these key travel generators.

*Response / Recommendation*

Support welcomed.

## Strategic Policy SP6

### Representation(s)

### Nature

1645 Welsh Government (Mr Mark Newey) [13]

Comment

#### Summary:

Policy SP1 supports the delivery of approximately 5,300 jobs, further evidence and explanation is required to explain how and where the level of job growth will be delivered, including both strategic and non-strategic allocations. It is unclear what the level of employment provision is and for what sector and how this translates into a land requirement for employment uses? The current employment evidence base is inconsistent and unclear. The plan is currently silent on the type and location of key employment sites required to deliver the strategy. Further explanation is also required on how all opportunities arising from the Swansea Bay City Region have been taken into account as part of the economic strategy.

The Deposit Plan should:

- provide greater articulation on the link between the plan's housing requirement and target for 5,300 jobs to ensure broad alignment in economic activity and labour force projections and reduce the need for commuting;
- identify an employment (ha) / job target and buffer;
- identify spatial allocations to meet identified need including broad timing and phasing and defining the land use by Use Class;
- if appropriate, include a new policy to protect and identify key employment sites to safeguard for future employment use;
- include a policy to support alternative uses on existing employment sites not safeguarded;
- explain how allocated sites will be delivered, especially key allocations; and policies to promote and sustain the rural economy.

### Response / Recommendation

**Noted. Additional evidence will be prepared to support and inform the preparation and content of the Deposit LDP. Note the authority is currently working at a sub-regional level on evidence in respect of employment provision.**

### Representation(s)

### Nature

641 Simrock Holdings Ltd [3217]

Comment

Agent: Savills (Mr Nick Heard) [3216]

#### Summary:

This policy states that certain sites will be allocated and safeguarded for employment purposes. If CCC is to allocate or safeguard land for employment purposes, such a policy should contain mechanisms for the alternative use of such land subject to a series of criteria which would enable alternative uses to come forward where circumstances exist to justify alternative use subject to other policies within the development plan.

These criteria would enable applications for alternative uses of land or buildings to be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. A failure to introduce such criteria could have the unintended consequences of the long-term vacancy allocated or safeguarded sites where there is no reasonable prospect of a site being used for such purposes to the detriment of the local economy or where alternative uses have merit.

### Response / Recommendation

**Comments noted. The Revised LDP will allocate and safeguard sufficient land for employment purposes, based upon robust evidence, and in accordance with the requirements set out within Planning Policy Wales (PPW) and Technical Advice Note (TAN) 23. The inclusion of criteria for potential alternative uses on such allocated sites will be considered under evolving policy during preparation of the Deposit LDP.**

<i>Representation(s)</i>	<i>Nature</i>
<b>613</b> Ifan Beynon-Thomas [3198]	<b>Object</b>
<i>Summary:</i>	
Strategic Policy - SP 6: Employment and the Economy should acknowledge that tourism uses can support a large number of jobs alongside the traditional B class uses.	
<i>Change To Plan Sought:</i>	
Strategic Policy - SP 6: Employment and the Economy should be amended to acknowledge that tourism uses can support a large number of jobs alongside the traditional B class uses.	

**Response / Recommendation**

**Disagree. The supporting text in respect of policy SP10 in respect of the Visitor Economy makes appropriate reference to the role it plays in creating jobs and its broader role within the economy of Carmarthenshire.**

<i>Representation(s)</i>	<i>Nature</i>
<b>18</b> Carmarthenshire County Council (Mr Stuart Walters) [2345]	<b>Support</b>
<i>Summary:</i>	
We note that SP6 - Employment and Economy as yet does not quantify the level of land to be allocated for employment use in the emerging LDP. We would welcome further dialogue on this matter as the plan evolves. We welcome the fact that section 11.60 refers to the Transformations - a Strategic Regeneration Plan for Carmarthenshire 2015-2030, and that the allocation of employment land reflects the aspirations of the regeneration strategy. We also support the fact that the plan reflects the needs of the city deal and that new sites located outside of the highest tiers of the hierarchy can make a significant contribution to the settlements and communities they serve, especially in rural areas where opportunities for new businesses to establish or existing businesses to expand would be severely constrained in the absence of appropriate sites and premises. We feel this is essential to ensure opportunity and growth is distributed fairly across the county.	

**Response / Recommendation**

**Comments noted, further evidence will be prepared in respect of Employment provision within the County. This evidence will be prepared in dialogue with the relevant partners ahead of the publication of the Deposit LDP.**

<i>Representation(s)</i>	<i>Nature</i>
<b>1691</b> Natural Resources Wales (Miss Sharon Luke) [3253]	<b>Support</b>
<i>Summary:</i>	
We welcome the point made in Section 11.65 on non-operational land providing scope for landscaping, buffer zones etc to be included in the land provision for allocated employment sites. This could also refer to sustainable drainage systems and ecological enhancement and protection.	

**Response / Recommendation**

**Support welcomed.**

## Paragraph 11.65

<i>Representation(s)</i>	<i>Nature</i>
<b>819</b> Natural Resources Wales (Miss Sharon Luke) [3253]	<b>Comment</b>

*Summary:*

We welcome the point made in Section 11.65 on non-operational land providing scope for landscaping, buffer zones etc. to be included in the land provision for allocated employment sites. This could also refer to sustainable drainage systems and ecological enhancement and protection.

***Response / Recommendation***

**Comments noted / support welcomed.**

## Strategic Policy SP7

<i>Representation(s)</i>	<i>Nature</i>
<b>1637</b> Welsh Government (Mr Mark Newey) [13]	<b>Comment</b>

*Summary:*

The authority must fully justify/evidence that the growth levels are directed to the most sustainable places, related to the scale and location of housing need, not impacting negatively on the Welsh language and is realistic and deliverable.

***Response / Recommendation***

**Noted. See representation 1647.**

<i>Representation(s)</i>	<i>Nature</i>
<b>1642</b> Welsh Government (Mr Mark Newey) [13]	<b>Comment</b>

*Summary:*

The Welsh Government is concerned that the proposed scale and distribution of housing growth, particularly within Tiers 3 and 4 raises implications of sustainability and potentially negatively impacts on the Welsh language. It is unclear why the more sustainable Service Centres have been allocated the same proportion of growth as Tiers 3 and 4? In addition, it is also unclear why Rural Villages (Tier 4) that have no settlement boundaries, services or facilities would have the same growth levels/capacity as Tier 2 settlements? This point is re-enforced by the Role and Function Topic Paper which highlights that Tier 3 settlements - Sustainable Villages have in broad terms limited services and facilitates. Tier 4 settlements are not even assessed. While the WG acknowledges the rural characteristics of Carmarthenshire, the scale and distribution of growth does not appear commensurate with the principles of sustainable development, nor the Councils own evidence within the SA or the Role and Function Paper. To summarise the Welsh Government has concerns about the scale of growth proposed to Tiers 3 and 4 of the settlement hierarchy conflicts with Planning Policy Wales.

***Response / Recommendation***

**Noted. The scale and distribution of growth will be subject to further evidencing as part of the preparation of the Deposit LDP - including the proportions allocated to the respective tiers within the hierarchy.**



**Representation(s)****Nature****1647** Welsh Government (Mr Mark Newey) [13]**Comment****Summary:**

Policy SP7 - Welsh language highlights the importance of the language to the area. A topic paper setting out how the Welsh language has influenced the scale of growth and strategy is essential given the significance of the Welsh language for this LDP. The consequence of the level/distribution of housing growth proposed on the Welsh language needs to be clearly articulated especially as past high levels of in migration and international migration are being used to justify the housing requirement. This is a key requirement of TAN 20 that has not been addressed. The SA of the Hybrid Option alludes to positive effects (SA, Figure 6) however the implications of the settlement hierarchy and proposed distribution of growth (SP16) is not conclusive in this respect (SA, Figure 8). There is no indication the authority has considered the potential strategic approaches to the Welsh language, as outlined in paragraph 2.5.2 of TAN 20. The authority should consider a suitable approach, taking account of how it fits with neighbouring authorities, and consider whether there are any anticipated impacts on the language which should be avoided or where they cannot be avoided, require mitigation.

**Response / Recommendation**

**Comments are noted. The Deposit LDP will be supported by a Topic Paper on the Welsh Language and informed by a Welsh Language impact Assessment. Further detailed policies will be provided in the Deposit Plan and these will address matters such as phasing and mitigation, if required.**

**Representation(s)****Nature****741** Mr Peter Hallam [3271]**Comment****Summary:**

The attention given to the essential position of the Welsh language in Carmarthenshire is feeble at best. When talking about a major development such as the proposed village (with many questions currently being raised regarding that development), no practical measures are identified to protect and promote the Welsh language in such a development.

The few words given to the position of the Welsh language and how it can be developed and promoted say nothing, in fact, on how that will be done.

I would like to commend the response given by the Welsh Language Society in its entirety as my response too. It encompasses all that I would like to state.

I can do no better than refer you to the detailed, balanced and incisive response by Cymdeithas yr Iaith (Welsh Language Society). Indeed I am in complete agreement with that response when discussing the whole scheme.

**Response / Recommendation**

**Comments are noted. The Preferred Strategy was subject to a SA/SEA which encompasses the Welsh language. The Deposit LDP will be informed by a Welsh Language Impact Assessment. We welcome ongoing dialogue with Welsh Language Organisations in respect of the impacts of the LDP upon the Welsh language and would welcome any data, evidence or research which they have prepared or are aware of.**

<i>Representation(s)</i>	<i>Nature</i>
<b>2423</b> Dyfodol (J W Thomas) [563]	<b>Object</b>
<i>Summary:</i>	
<p>The respondent considers that the Preferred Strategy does not support the Welsh language and is contrary to the County Council and Welsh Government's aspirations. In expressing this, the respondent makes reference to a number of aspects of the LDP and the land use planning system. However, it is considered that the main issue raised is that the level of housing growth proposed in the Preferred Strategy would attract in-migration and in turn negatively impact upon the Welsh language in the County, in noting this, the respondent make specific reference to empty homes in the County.</p>	

***Response / Recommendation***

**Comments are noted. The Preferred Strategy was subject to a SA/SEA which encompasses the Welsh language. The number of empty homes in the county were factored into the identified housing need, however, it should be noted that there are a number of factors which lie outside of the scope and control of the LDP and the land use planning system which impact upon the availability of vacant properties. The Plan will continue to be prepared in accordance with national policy and national guidance and aims to support the aspirations of both Carmarthenshire County Council and Welsh Government. We welcome ongoing dialogue with Welsh Language Organisations in respect of the impacts of the LDP upon the Welsh language and would welcome any data, evidence or research which they have prepared or are aware of.**

<i>Representation(s)</i>	<i>Nature</i>
<b>19</b> Carmarthenshire County Council (Mr Stuart Walters) [2345]	<b>Support</b>
<i>Summary:</i>	
<p>SP7 - Welsh Language and Culture, this policy is welcomed and its importance in creating a sense of place and effect on the economy cannot be underestimated.</p>	

***Response / Recommendation***

**Support welcomed.**

<i>Representation(s)</i>	<i>Nature</i>
<b>1703</b> Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326]	<b>Support</b>
<i>Summary:</i>	
<p>The Welsh language which continues to be an important component in the social, cultural and economic life of many communities will be protected and supported by managing development sensitively in areas where it has a significant role in the community.</p>	

***Response / Recommendation***

**Support Welcomed**

## Paragraph 11.66

### Representation(s)

### Nature

2431 Rhanbarth Sir Gâr Cymdeithas yr Iaith (Rhanbarth Sir Gâr) [2370] Object

#### Summary:

The respondent notes their disappointment noting that they wish to see the LDP protect communities with a high proportion of Welsh speakers being afforded protection from over-development. The respondent also notes that they consider that the Local Authority should devise its own mechanism for assessing the impact of development on the Welsh language and that it has not assessed the impact of the options outlined.

### Response / Recommendation

Comments are noted. Policy SP7: Welsh Language and Culture and its supporting text notes that the Plan notes that development proposals which have a detrimental impact on the Welsh language will not be permitted unless it can be mitigated.

The impacts of each Spatial and Growth Option was assessed through the SA/SEA. The Deposit Plan will be informed by a Welsh Language Impact Assessment.

## Strategic Policy SP8

### Representation(s)

### Nature

1750 City & County of Swansea (Mr Tom Evans) [3761] Comment

#### Summary:

In accordance with the position set out in the Swansea LDP (Policy RP4 and reasoned justification) Swansea Council will continue to work in collaboration with Carmarthenshire County Council and partners NRW and DCWW to protect the water quality of the Burry Inlet and Loughor Estuary that forms part of the Carmarthen Bay and Estuaries European Marine Site (CBEEMS). This work may include producing and updating a joint agreement or 'Memorandum of Understanding' that will set out the roles and responsibilities of each organisation in the provision of foul water infrastructure to safeguard against any unacceptable detrimental impacts on the Estuary arising from additional foul flows from new development. DCWW has indicated that Llannant WWTWs, that discharges into the CBEEMS and has a catchment covering both authorities, is reaching capacity. In advance of DCWW undertaking the necessary improvement to Llannant Waste Water Treatment Works through their AMP it may be necessary to require development in its catchment to provide compensatory surface water removal from the foul water system. The Swansea LDP acknowledges that ultimately in order to protect water quality of the Burry Inlet and Loughor Estuary a Nutrient Management Plan may be required This is a key trans-boundary issue which should be appropriately reflected in the LDP evidence base and associated SA and HRA documents.

### Response / Recommendation

Comments noted. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard. It is noted that in relation to the Memorandum of Understanding, there are other stakeholders in addition to the Council and the respondent and as such this matter will be fully explored in a collaborative manner as the Plan making process proceeds towards the Deposit LDP.

The Council fully recognises that this is a key trans-boundary issue which should be appropriately reflected in the LDP evidence base and associated SA and HRA documents. Reference should be made to the Council's response to representation 1704.

**Representation(s)**

**Nature**

**1756** City & County of Swansea (Mr Tom Evans) [3761]

**Comment**

**Summary:**

Strategic Policy SP8 - Infrastructure - We suggest that the Swansea Infrastructure Delivery Plan (IDP) (see ED056b Revised IDP) which supports the Swansea LDP could provide useful evidence to inform consideration of the capacity of local infrastructure. The IDP contains detailed requirements for infrastructure provision on allocated sites along the Swansea side of the Carmarthenshire boundary.

**Response / Recommendation**

**Comments noted. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard.**

**Representation(s)**

**Nature**

**1757** City & County of Swansea (Mr Tom Evans) [3761]

**Comment**

**Summary:**

It is noted that there are number of candidate sites within the Hendy area where the local transboundary and in-combination effects of allocations should be taken into consideration during the site assessment process. We suggest that the impact of planned infrastructure provision and improvements within the Swansea boundary could usefully be taken into consideration in the preparation of the Carmarthenshire Deposit Plan, particularly with regard to the site selection process and the assessment of impact of sites on the highways network. In particular, reference could usefully be made to

- \* Swansea Infrastructure Development Plan,
- \* LDP Appendix 3 Site Requirements, L
- \* DP Appendix 5 - Transport Proposals Priority Measures
- \* Infrastructure requirements of LDP Strategic Site Policies SD A and SD H: which include on and off-site highways improvements, provision of a new primary school and contributions to improvements at Pontarddulais Railway station).

**Response / Recommendation**

**Comments noted. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard. The Site Assessment Methodology will allow for the consideration of candidate sites, including those submitted within the Hendy area.**

<i>Representation(s)</i>	<i>Nature</i>
<b>1704</b> Natural Resources Wales (Miss Sharon Luke) [3253]	<b>Comment</b>

**Summary:**

The MOU no longer relates to any HRA for the coastal area of Llanelli. NRW are satisfied that any development within the area will be captured by the overarching HRA for the LDP.

SuDS must be designed and built in accordance with the SuDS Standards and Schemes must be approved by the LA acting in its SAB role. Water quality mitigation should be captured with the SABS which supersedes the existing MOU. NRW advocate the inclusion of a policy/strategy/supporting text with the LDP supporting no new connections of surface water to the main foul sewerage system from new development sites.

**Response / Recommendation**

**Comments noted. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard. It is noted that in relation to the Memorandum of Understanding, there are other stakeholders in addition to the Council and the respondent and as such this matter will be fully explored in a collaborative manner as the Plan making process proceeds towards the Deposit LDP. Reference should also be made to the Council's response to representation 1750. Adequate referencing to the SAB (and indeed the relationship between the planning and SAB application processes) will be required and due consideration will also be given to the implications of SAB consent in the site assessment methodology (noted that some allocations will be based on approvals pre SUDS implementation).**

<i>Representation(s)</i>	<i>Nature</i>
<b>820</b> Natural Resources Wales (Miss Sharon Luke) [3253]	<b>Comment</b>

**Summary:**

We support the recognition given to the importance of infrastructure capabilities within the policy and supporting paragraphs. We also note your definition for infrastructure includes roads, transport facilities, water supplies, sewerage and associated waste water treatment facilities, energy supplies and distribution networks and telecommunications infrastructure.

We acknowledge that certain sites will need to be appropriately phased through the development process such as the proposed phased plan for the Llanelli Life Science and Well-being Village.

**Response / Recommendation**

**Comments noted / support welcomed.**

<i>Representation(s)</i>	<i>Nature</i>
<b>1593</b> mr william Phillips [3566]	<b>Comment</b>

**Summary:**

The Strategic Policy (SP8) is reasonable and correct, to a certain extent However, recent experience has demonstrated that developers are able to submit acceptable plans, to cater for deficient infrastructure, until Planning permission has been granted. Thereafter, the plans are scrapped, Houses are allowed, by the Planners, to be completed, eg. without sewerage, DCWW are then obliged under the Water Act of 1991, to provide sewerage services for those dwellings. INFRASTRUCTURE MUST BE IN PLACE, PRIOR TO THE GRANTING OF PLANNING CONSENT to avoid such consent being obtained through &quot;smoke and mirrors.&quot;

**Response / Recommendation**

**Noted. The Council will continue to work closely with infrastructure providers and developers to ensure sites are deliverable and that adequate services are available.**

<i>Representation(s)</i>	<i>Nature</i>
<b>1079</b> Cai Parry [822]	<b>Object</b>

*Summary:*

Support reference to location development close to existing infrastructure. Object to references to viability being relegated to the supporting text. Viability should be directly referred to within the policy text itself.

*Change To Plan Sought:*

The final paragraph of Strategic Policy SP 8 should be amended as follows:

"Where financially viable, planning obligations may be sought to ensure that the infrastructure, services and facilities needed to deliver and support the development are delivered".

***Response / Recommendation***

**Disagree. Financial viability is implicit within this policy and is adequately covered within the supporting text.**

<i>Representation(s)</i>	<i>Nature</i>
<b>1669</b> Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]	<b>Support</b>

*Summary:*

As outlined above, the availability or capacity of infrastructure is key in determining a settlement's sustainability. As such, we welcome the provisions of this policy in requiring development proposals to ensure sufficient capacity is available in infrastructure or if not, that suitable arrangements are in place to provide the necessary infrastructure capacity.

***Response / Recommendation***

**Support welcomed.**

<i>Representation(s)</i>	<i>Nature</i>
<b>20</b> Carmarthenshire County Council (Mr Stuart Walters) [2345]	<b>Support</b>

*Summary:*

We support the principles contained in SP8- Infrastructure and welcome the fact that development will be supported by adequate infrastructure. Reference to the plan being "sufficiently responsive and flexible to market demand up to 2033.." is supported.

***Response / Recommendation***

**Support welcomed.**

<i>Representation(s)</i>	<i>Nature</i>
<b>1692</b> Natural Resources Wales (Miss Sharon Luke) [3253]	<b>Support</b>

*Summary:*

We support the recognition given to the importance of infrastructure capabilities within the policy and supporting paragraphs. We also note your definition for infrastructure includes roads, transport facilities, water supplies, sewerage and associated waste water treatment facilities, energy supplies and distribution networks and telecommunications infrastructure.

We acknowledge that certain sites will need to be appropriately phased through the development process such as the proposed phased plan for the Llanelli Life Science and Well-being Village.

***Response / Recommendation***

**Support welcomed.**

<i>Representation(s)</i>		<i>Nature</i>
551	RSAl [3167] <i>Agent: Lichfields (Mr Arwel Evans) [3166]</i>	Support
<i>Summary:</i> It is clear that Llangennech is a sustainable settlement which benefits from good infrastructure and therefore merits its position in the settlement hierarchy. Development should therefore be directed to sustainable sites within or adjacent to the settlement.		

**Response / Recommendation**

support welcomed

**Paragraph 11.71**

<i>Representation(s)</i>		<i>Nature</i>
1670	Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]	Comment
<i>Summary:</i> With specific regard to water and sewerage infrastructure, where insufficient capacity is available and where no reinforcement works are programmed within the respective Capital Investment Programme, the requisition provisions can be entered into for the water and sewerage infrastructure. The requisition provisions do not apply in the instance of wastewater treatment works (WwTW), and as such planning obligations may be necessary.		

**Response / Recommendation**

**Comments noted. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard.**

**Strategic Policy - SP9**

<i>Representation(s)</i>		<i>Nature</i>
1649	Welsh Government (Mr Mark Newey) [13]	Comment
<i>Summary:</i> The latest Gypsy Traveller Accommodation Needs Assessment (GTAA) approved by Welsh Ministers does not form part of the evidence base to inform the accommodation needs of Gypsy and Traveller families. The Authority must ensure the GTAA referenced in the reasoned justification to Policy SP9 is the version currently signed-off by Welsh Ministers. To identify the level of need and timescales for delivery, the GTAA must cover the entire replacement plan period (2018-2033), which it does not at present. By Deposit stage, a new GTAA must be prepared and agreed by Welsh Ministers with provision made for appropriate and deliverable site allocations to meet any need in the timescales identified. We note the Council are currently undertaking a separate call for gypsy and traveller sites (until April), including the methodology for site selection. This is a key issue for the authority and failure to identify the level of need and allocated sites in the Deposit Plan to meet the identified need is likely to result in the plan being unable to be found sound. In the Deposit plan, the results of the new GTAA must be clear in terms of the total and type of need and timescales for meeting this up to 2033.		

**Response / Recommendation**

**Noted. The Council recognises the importance of the Gypsy and Traveller Accommodation Assessment (GTAA) in respect of the LDP, and is in the process of developing a revised GTAA through to 2033. As noted by the respondent, a 'call for sites' in respect of Gypsy and Traveller provision is underway the outcome of which will inform the preparation of the Deposit LDP.**

<i><b>Representation(s)</b></i>	<i><b>Nature</b></i>
<b>21</b> Carmarthenshire County Council (Mr Stuart Walters) [2345]	<b>Support</b>
<i>Summary:</i> SP9 - Gypsy and Traveller Provision, policy is noted.	

***Response / Recommendation***

**Comments noted**

<i><b>Representation(s)</b></i>	<i><b>Nature</b></i>
<b>1684</b> Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326]	<b>Support</b>
<i>Summary:</i> Support in principal Strategic Policy SP9.	
Does the issue regarding accommodation of travelling show people need explicit reference in the Policy itself?	

***Response / Recommendation***

**Comment Noted. An updated Gypsy and Traveller assessment will be undertaken prior to the Deposit LDP which will clarify any issues regarding accommodation needs for Travelling Show people and how this is explicitly addressed within the Policy.**



## Strategic Policy SP10

### Representation(s)

### Nature

646

WYG PLANNING &amp; ENVIRONMENT (Louise Darch) [598]

Comment

#### Summary:

The objectives of Strategic Policy SP10 are broadly welcomed and supported. The respondent in promoting the status of Ffos las racecourse makes the following specific points in respect to Strategic Policy SP10:

1. Strategic Policy 10 should explicitly reference and promote Ffos Las as a key visitor attraction and strategic priority.

Ffos Las directly contributes to the delivery of the following Preferred Strategy strategic objectives:

\* SO2 - it promotes wellbeing opportunities through access to leisure and recreational facilities as well as the countryside;

\* SO4 - promotes access to leisure facilities and work opportunities;

\* SO12 - provides opportunity for investment & innovation in rural and urban areas, delivers employment and contributes at a regional level to the delivery of the Swansea Bay City Deal;

\* SO13 - provides a sustainable & high quality all year-round tourism destination.

Planning Policy Wales stipulates that there is a need for local planning authorities to establish a framework for well-located, good quality sport, recreational and leisure facilities, and develop clear policies for the provision, protection and enhancement of sport, recreation and leisure facilities; (PPW, para 4.5.2). References the duty to improve the social and cultural well-being of Wales, in accordance with the Well-being of Future Generations (Wales) Act 2015. Suggests the following wording: The Visitor Economy Proposals for tourism and leisure related developments will be supported at Ffos Las and other important visitor attractions.

Ffos Las is an important local employer and a wealth-generating, multi-faceted visitor attraction to Carmarthenshire. It is a regionally important facility.

2. Ffos Las promoted as a preferred location for Visitor Economy Development

The strategic policy wording should make direct reference to the Ffos Las racecourse as a preferred location for new tourism and leisure related development, including accommodation in accordance with PPW.

### Response / Recommendation

**Whilst the role of Ffos Las is noted, it is not considered necessary or appropriate to specifically identify a single facility as part of the strategic policy. The potential role of the facility and its contribution in light of the content of the Plan and the provisions of national planning policy will be considered as part of the deposit LDP.**

### Representation(s)

### Nature

615

Ifan Beynon-Thomas [3198]

Object

#### Summary:

The policy should be amended to acknowledge that small scale tourist developments will be allowed outside settlement limits where suitable sites are identified and a well considered scheme is put forward. This is especially true in the context of agricultural diversification.

#### Change To Plan Sought:

The policy should be amended to acknowledge that small scale tourist developments will be allowed outside settlement limits where suitable sites are identified and a well considered scheme is put forward. This is especially true in the context of agricultural diversification.

### Response / Recommendation

**Disagree. The points raised by the respondent will be more appropriately considered as part of the preparation of the Deposit LDP. In this regard they are not considered appropriate for a strategic policy as they relate to matters considered through specific policies.**

**Representation(s)**

**Nature**

**22 Carmarthenshire County Council (Mr Stuart Walters) [2345] Support**

*Summary:*

SP10 - The Visitor Economy is fully supported as tourism plays an important part in the economy of Carmarthenshire and a planning framework that acknowledges that markets change and that the plan needs to appreciate this is very positive. The emphasis on high quality is also supported as this will assist in driving the local economy forward, as it's likely to attract jobs of a higher quality which is welcomed.

**Response / Recommendation**

**Support welcomed.**

**Representation(s)**

**Nature**

**1697 Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326] Support**

*Summary:*

Support SP10 The Visitor Economy.  
Both Authorities recognise the importance of the visitor economy to west Wales and aim to support the sector and attract visitors all year round. Both also recognise that some attractions require a countryside setting but that this should be the exception, and the majority of tourism related development being sustainably located.

**Response / Recommendation**

**Support Welcomed**

**Representation(s)**

**Nature**

**1694 Natural Resources Wales (Miss Sharon Luke) [3253] Support**

*Summary:*

We welcome the inclusion of landscape and nature conservation as assets which require protection for our future generations as noted in Section 11.89, and the reference to cumulative impacts within Section 11.94.

**Response / Recommendation**

**Support welcomed.**

**Paragraph 11.89**

**Representation(s)**

**Nature**

**823 Natural Resources Wales (Miss Sharon Luke) [3253] Comment**

*Summary:*

We welcome the inclusion of landscape and nature conservation as assets which require protection for our future generations as noted in Section 11.89, and the reference to cumulative impacts within Section 11.94.

**Response / Recommendation**

**Support welcomed.**

## Paragraph 11.91

**Representation(s)**

**Nature**

698 Lynda James [3039]

Support

**Summary:**

The Letitia Cornwallis "vision" fits with rural development and tourism and sits in SC27 so is seen as a sustainable community.

**Response / Recommendation**

**Noted, site specific matters are considered as part of the candidate site process.**

## Paragraph 11.94

**Representation(s)**

**Nature**

822 Natural Resources Wales (Miss Sharon Luke) [3253]

Comment

**Summary:**

We welcome the inclusion of landscape and nature conservation as assets which require protection for our future generations as noted in Section 11.89, and the reference to cumulative impacts within Section 11.94.

**Response / Recommendation**

**Support welcomed.**

## Strategic Policy - SP11

**Representation(s)**

**Nature**

1672 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]

Comment

**Summary:**

We note that there is no reference within the PS to the established SuDS Approval Boards (SABs) as set out in the Flood and Water Management Act 2010 (Schedule 3).

The requirement for new developments to obtain SAB consent may result in layouts and densities changing in some housing developments, but the onus is on landowners/developers to consider SuDS prior to master planning their site which will ensure there is no need to retrofit schemes into the design at a later stage.

Planning and SAB application processes are intrinsically linked, we would suggest including reference to it within the Preferred Strategy.

**Response / Recommendation**

**Comments noted. Whilst the promotion of SuDS is referenced within criteria (g) of this SP11 and criteria (b) of SP15, it is accepted that there is a need to elaborate upon references to the SuDS Approval Boards (SABs). At the time the Preferred Strategy was published the process of setting up and formalising the Carmarthenshire SAB was ongoing, however it will be well up and running by the time the Deposit LDP is published. As such, adequate referencing to the SAB (and indeed the relationship between the planning and SAB application processes) will be required and due consideration will also be given to the implications of SAB consent in the site assessment methodology (noted that some allocations will be based on approvals pre SUDS implementation).**

**Representation(s)****Nature**

**1695** Natural Resources Wales (Miss Sharon Luke) [3253] **Comment**

**Summary:**

We welcome the inclusion of this policy and the supporting text aimed at facilitating sustainable development.

**Response / Recommendation**

**Support welcomed.**

**Representation(s)****Nature**

**824** Natural Resources Wales (Miss Sharon Luke) [3253] **Comment**

**Summary:**

We welcome the inclusion of this policy and the supporting text aimed at facilitating sustainable development

**Response / Recommendation**

**Support welcomed.**

**Representation(s)****Nature**

**1671** Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830] **Support**

**Summary:**

We specifically welcome the inclusion of criteria g) in Policy SP11. Disposing of surface water in a sustainable manner will ensure that it will not communicate with the public sewerage network, thereby having the double effect of protecting the environment and ensuring there is sufficient capacity in the public sewerage network for foul-only flows from development sites.

**Response / Recommendation**

**Support welcomed.**

**Representation(s)****Nature**

**23** Carmarthenshire County Council (Mr Stuart Walters) [2345] **Support**

**Summary:**

SP 11- Place-making, Sustainability and High Quality Design, SP13 - Protection and Enhancement of the Natural Environment and SP14 - Protection and Enhancement of the Built and Historic Environment. We fully support the principles laid out in these Strategic Policies and see place making and protection of the natural and built environment as a major driver in creating distinctiveness throughout the county. Such policies will improve the quality of life for residents and increase the quality of offer to visitors, which ultimately will have a positive impact upon the economy of Carmarthenshire.

**Response / Recommendation**

**Support welcomed.**

<i>Representation(s)</i>	<i>Nature</i>
<p><b>1688</b> Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326]</p> <p><i>Summary:</i>                      Climate Change                      Support in principle. Support Policy SP11 Placemaking, sustainability and High quality Design, and SP15 Climate change.                      Note: See comment across                      The Authorities have a shared understanding of the need to plan for climate change and to mitigate its impacts and to provide for high quality design to ensure that new development is adaptable to climate change.</p> <p>The policy approach could usefully address the potential location and scale of future flooding, particularly coastal areas and communities affected by predicted sea-level change, and coastal change areas included in the South Wales Shoreline Management Plan 2.</p>	<p><b>Support</b></p>

***Response / Recommendation***

**Support Welcomed and Comments Noted.**

**Strategic Policy - SP12**

<i>Representation(s)</i>	<i>Nature</i>
<p><b>1643</b> Welsh Government (Mr Mark Newey) [13]</p> <p><i>Summary:</i>                      To demonstrate delivery and sustainable distribution of growth across the settlement hierarchy the Deposit plan must; Identify spatial distribution and components of housing land supply as allocations, commitments and windfall sites (small and large) for each settlement tier in which they will be delivered (See LDP Manual, Ed 3). The policy framework must clearly articulate the type and scale of development that would be appropriate at each tier of the hierarchy. Policy SP12 Rural Development needs strengthening in this respect.</p>	<p><b>Comment</b></p>

***Response / Recommendation***

**Noted. The matters identified by the respondent will be considered as part of the preparation of the Deposit LDP.**  
**The reference to the requirements of the Local Development Manual Edition 3 is noted and will be appropriately considered as part of the preparation of the Deposit Plan. However, it should be noted that Edition 3 of the Manual at the time of writing is pending publication and as such could not be considered in the preparation of the Preferred Strategy.**

**Representation(s)**

**Nature**

**1707** Natural Resources Wales (Miss Sharon Luke) [3253]

**Comment**

*Summary:*

Considerations for agricultural development should consider the content of the Chief Planning Officer letter of 12/06/18 on intensive agriculture. Consideration must be given to all wastes arising, cumulative impacts and water quality.

The new Agricultural Pollution Regulations will lay down new government policy regarding agriculture. The regulations will apply to all holdings from 01/01/20, with transitional periods for some elements to allow farmers time to adapt and ensure compliance. The regulations will replicate good practice measures focussed on good nutrient management. Further information on what will need to be done and by when will be provided in the near future.

**Response / Recommendation**

**Comments noted. This matter will be given full consideration as part of the preparation of the Deposit LDP. The Council looks forward to receiving any guidance associated with the Agricultural Pollution Regulations and the content of Chief Planning Officer's letter of 12/06/18 on intensive agriculture is duly noted. The Sustainability Appraisal and Habitats Regulations Assessment will provide an important role in ensuring that the Plan as a whole does not impact negatively**

**Representation(s)**

**Nature**

**2420** Dyfodol (J W Thomas) [563]

**Object**

*Summary:*

The respondent supports the section on rural development, however, has concerns that there is no reference to the welfare of the Welsh language in developments in the towns and post-industrial area in the south-east of Carmarthenshire.

**Response / Recommendation**

**Policy SP7 Welsh Language and Culture is applicable to the whole County. Specific reference is made to paragraph 11.68 which explicitly notes that the policy is not restricted to specific parts of the County and applies to the County in its entirety.**

**Representation(s)**

**Nature**

**24** Carmarthenshire County Council (Mr Stuart Walters) [2345]

**Support**

*Summary:*

SP 12 - Rural Development recognises the good work being carried out by the County Council's Rural Task Force. Recognition of their work on the economy and employment is positive and we welcome the fact that the preferred strategy will consider this work in developing policies in relation to rural Carmarthenshire.

**Response / Recommendation**

**Support welcomed.**

## Strategic Policy - SP13

**Representation(s)**

**Nature**

**1652** Welsh Government (Mr Mark Newey) [13] **Comment**

*Summary:*

Opportunities to secure enhancement of biodiversity and the resilience of ecosystems have to be taken at the plan level in order to fulfil duties under Section 6 of the Environment Act. The plan is the opportunity to take a comprehensive approach towards protection and enhancement and to set out what can be achieved. This approach goes beyond what can be achieved as part of identifying allocations. Strategic Policy 13 - Protection and Enhancement of the Natural Environment should be re-framed as 'Maintaining and Enhancing the Natural Environment'. It would be helpful to understand how the Green Infrastructure Assessment (as required in PPW10) will inform the implementation of this policy and also the relationship of this policy to Strategic Policy 8: Infrastructure.

**Response / Recommendation**

**Agree. The title of the policy to be amended as follows: 'Maintaining and Enhancing the Natural Environment'.**

**The Revised LDP will be supported and underpinned by a Green Infrastructure Assessment (GIA). This will include those policy areas referenced by the respondent and will be published ahead of the publication of the Deposit LDP. The GIA seeks to inform the policy provisions of the Plan as a whole and not only those policy areas referenced by the respondent.**

**Representation(s)**

**Nature**

**826** Natural Resources Wales (Miss Sharon Luke) [3253] **Comment**

*Summary:*

Acknowledge HRA has been undertaken.  
Concerned with the wording in the policy.

**Response / Recommendation**

**Reference is made to the Council's response to representation reference 1699.**

**Representation(s)**

**Nature**

**1699** Natural Resources Wales (Miss Sharon Luke) [3253] **Object**

*Summary:*

We are concerned about the following wording within the policy:  
"Proposals must reflect the role an ecologically connected environment has in protecting .....

Whilst recognising the importance of ecological connections, this is one element of the many that contributes to defining the landscape and sense of place. Other important elements include geology, landform, landcover, field boundaries, buildings, historic features, to name a few. Landscape is not a sub-set of ecological connections and the strategic policy needs to reflect a broader understanding of the natural environment and landscape if account is to be taken of landscape character and sense of place.

**Response / Recommendation**

**Agreed. This Strategic Policy should seek to set a strategic framework for the promotion of Sustainable Management of Natural Resources. Add the following wording to the policy at the last line of the Policy- ...to a sense of Well-being "and the principles of the Sustainable Management Of Natural Resources".**

**Reference is made to the Council's response to representation reference 826.**

**Representation(s)****Nature****1080** Cai Parry [822]**Object****Summary:**

BDW Homes considers that the wording of Policy SP 13 is too onerous, on the basis that paragraph 6.4.3 of Planning Policy Wales (Edition 10) states that "Development plan strategies, policies and developments must consider the need to....secure enhancement of and improvements to ecosystem resilience by improving diversity, condition, extent and connectivity of ecological networks". It is noted that Planning Policy Wales does not require all developments to secure enhancements to biodiversity, only to consider it. This comprises recognition by the Welsh Governments that enhancements to biodiversity interests may not always be feasible or appropriate.

**Change To Plan Sought:**

The wording of the first paragraph of Strategic Policy SP 13 should therefore be amended as follows:

"Proposals for development will be expected to protect and, where appropriate, enhance the County's natural environment".

**Response / Recommendation**

**Noted. The comments by the respondent in respect of Strategic Policy SP 13 are duly noted. Any necessary amendments to wording will be considered as part of the preparation of the Deposit LDP, to ensure that it accords with Planning Policy Wales.**

**Representation(s)****Nature****2389** Carmarthenshire County Council (Mr Stuart Walters) [2345]**Support****Summary:**

SP 11- Place-making, Sustainability and High Quality Design, SP13 - Protection and Enhancement of the Natural Environment and SP14 - Protection and Enhancement of the Built and Historic Environment. We fully support the principles laid out in these Strategic Policies and see place making and protection of the natural and built environment as a major driver in creating distinctiveness throughout the county. Such policies will improve the quality of life for residents and increase the quality of offer to visitors, which ultimately will have a positive impact upon the economy of Carmarthenshire.

**Response / Recommendation**

**Support welcomed.**

**Representation(s)****Nature****1705** Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326]**Support****Summary:**

Both Plans seek to ensure that their Plan areas natural and historic environment and landscape will be protected from inappropriate development and, where possible, enhanced.

It would be beneficial if the Plan explicitly made reference to needing to take account of not compromising the qualities of important landscapes including the Pembrokeshire Coast and Brecon National Parks. (see paragraph 6.36 of Planning Policy Wales 10).

**Response / Recommendation**

**Comments Noted**



**Representation(s)**

**Nature**

**1696** Natural Resources Wales (Miss Sharon Luke) [3253] **Support**

**Summary:**

We welcome this policy and acknowledge that a Habitats Regulation Assessment (HRA) has been undertaken to assess the impacts of the Plan on European protected sites (including those in candidate stage of designation).

**Response / Recommendation**

**Support welcomed.**

**Representation(s)**

**Nature**

**1708** Natural Resources Wales (Miss Sharon Luke) [3253] **Support**

**Summary:**

Caeau Mynydd Mawr SPG - NRW agree that the SPG is still required as part of the revised LDP.

**Response / Recommendation**

**Comments noted/Support welcomed. The Council looks forward to continuing its constructive dialogue with the respondent along with other stakeholders as the Plan making process proceeds towards the Deposit LDP. The Council will publish a robust suite of evidence to support the SPG. Reference is also made to the Habitats Regulations Assessment.**

**Strategic Policy - SP14**

**Representation(s)**

**Nature**

**1792** Whitland Town Council (Vicky Mitchell) [91] **Comment**

**Summary:**

I would like to request that SPG is also included within the LDP. This should state that any longstanding empty property site or Chapel could become mixed use after X number of years. This would encourage flexibility and trigger economic activity. This should also apply to Town Centre shops, disused rural buildings and particularly land within the UDP/LDP that has remained undeveloped or tied up in pension schemes for decades limiting the possibility of potential active developers being included. Eg land at Spring gardens has been included and undeveloped for half a century. Derelict or unused parts of the former creamery site for a quarter of a century. Other sites unused for more than a decade.  
 NB. X not to mean half a century. 25 years or less is extremely reasonable dependent on type of dereliction or non use.

**Response / Recommendation**

**Noted. Issues such as those proposed by the respondent relate to the deliverability of sites and will be considered during the drawing up of policies as part of the Deposit LDP. SPG will be produced on specific issues, however it is too early to say whether they will cover the issues proposed by the respondent.**

**Representation(s)**

**Nature**

**2390** Carmarthenshire County Council (Mr Stuart Walters) [2345] **Support**

**Summary:**

SP 11- Place-making, Sustainability and High Quality Design, SP13 - Protection and Enhancement of the Natural Environment and SP14 - Protection and Enhancement of the Built and Historic Environment. We fully support the principles laid out in these Strategic Policies and see place making and protection of the natural and built environment as a major driver in creating distinctiveness throughout the county. Such policies will improve the quality of life for residents and increase the quality of offer to visitors, which ultimately will have a positive impact upon the economy of Carmarthenshire.

**Response / Recommendation**

**Support welcomed.**

**Representation(s)**

**Nature**

**1706** Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326] **Support**

*Summary:*

Both Plans seek to ensure that their Plan areas natural and historic environment and landscape will be protected from inappropriate development and, where possible, enhanced.

**Response / Recommendation**

**Support Welcomed**

**Paragraph 11.120**

**Representation(s)**

**Nature**

**699** Lynda James [3039] **Support**

*Summary:*

Cornwallis is a listed building with much history attached.

**Response / Recommendation**

**Noted, site specific matters are considered as part of the candidate site process.**

**Strategic Policy - SP15**

**Representation(s)**

**Nature**

**1651** Welsh Government (Mr Mark Newey) [13] **Comment**

*Summary:*

LPAs should take a leadership role in pro-actively planning for renewable and low carbon energy. LPAs should fully utilise evidence in their renewable energy assessments (REA) to develop locally specific policies, set renewable energy targets and direct development to the most appropriate locations. It is extremely disappointing that the Preferred Strategy document does not have a specific policy on renewable energy, nor is it clear how opportunities for decarbonisation and renewable energy has influenced the strategy. There is currently no evidence on this topic.

**Response / Recommendation**

**Noted. The Council will seek to prepare and publish a Renewable Energy Assessment as part of its evidence base in support of the Deposit LDP. This will inform locally specific policies and will seek to set the renewable energy targets and locations referenced by the respondent within the representation. Whilst it is noted that there is no strategic policy in respect of renewable energy, such matters are adequately considered as part of Strategic Policy SP15 Climate Change. Further detailed renewable energy policies will be set out as part of the Deposit LDP.**

**Representation(s)**

**Nature**

**271** RWE Innogy UK Ltd (Miss Eleri Davies) [471] **Comment**

*Summary:*

Support the reference in Strategic Policy 15 (SP15) 'Climate Change' criterion c. to the energy hierarchy, including "increasing the supply of renewable energy" but this is the only direct reference to this topic in the entire Preferred Strategy.

**Response / Recommendation**

**Comments noted.**

<i>Representation(s)</i>	<i>Nature</i>
<b>273</b> RWE Innogy UK Ltd (Miss Eleri Davies) [471]	<b>Comment</b>

**Summary:**

Whilst appreciating that the Preferred Strategy is broad brush, it does contain fewer renewable energy references than is usual. Further rounds of consultation will clearly include the Council's detailed approach to renewable energy policies. It is positive that the LDP Review Report (February 2018) acknowledged the need for a Renewable Energy Assessment to underpin the renewable energy policies to be contained within the Revised Local Development Plan (LDP).

Further consideration needs to be given to renewable energy in the Deposit LDP which will include detailed and specific policies.

**Response / Recommendation**

**Comments noted. A Renewable Energy Assessment will be undertaken to inform the policies of the Plan, and more detailed policies will also be included with specific reference to renewable energy.**

<i>Representation(s)</i>	<i>Nature</i>
<b>25</b> Carmarthenshire County Council (Mr Stuart Walters) [2345]	<b>Support</b>

**Summary:**

SP15 - Climate Change, policy noted.

**Response / Recommendation**

**Comments Noted.**

<i>Representation(s)</i>	<i>Nature</i>
<b>1702</b> Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326]	<b>Support</b>

**Summary:**

Both plans have regard to the need to generate more electricity from renewable sources. Pembrokeshire Coast National Park Authority has a renewable energy strategy policy seeking the delivery of appropriate renewable energy developments.

Both Authorities implement joint guidance on assessing the cumulative impact of wind turbines. It would be useful to confirm if Carmarthenshire intends to bring forward the Cumulative Impact of Turbine Guidance in the replacement Local Development Plan.

Carmarthenshire includes renewable energy as part of Strategic Policy 15: Climate Change (part c), but has no specific renewable energy policy at present.

**Response / Recommendation**

**Comments Noted**

<i>Representation(s)</i>	<i>Nature</i>
<b>1700</b> Natural Resources Wales (Miss Sharon Luke) [3253]	<b>Support</b>

**Summary:**

We support the inclusion of this policy and supporting text. We acknowledge that your Authority has commissioned a strategic flood consequence assessment for Carmarthenshire which will be used to inform policies and allocations, ensuring the appropriate siting of development from areas at flood risk now and those that become vulnerable to flood risk in the future because of climate change. We support the stance that development which does not accord with the provisions of Technical Advice Note (TAN) 15 will be resisted.

**Response / Recommendation**

**Support welcomed.**

**Representation(s)**

**Nature**

**827** Natural Resources Wales (Miss Sharon Luke) [3253] **Support**

*Summary:*

We support the inclusion of this policy and supporting text. We acknowledge that your Authority has commissioned a strategic flood consequence assessment for Carmarthenshire which will be used to inform policies and allocations, ensuring the appropriate siting of development from areas at flood risk now and those that become vulnerable to flood risk in the future because of climate change. We support the stance that development which does not accord with the provisions of Technical Advice Note (TAN) 15 will be resisted.

**Response / Recommendation**

**Support welcomed.**

**Paragraph 11.134**

**Representation(s)**

**Nature**

**272** RWE Innogy UK Ltd (Miss Eleri Davies) [471] **Comment**

*Summary:*

The reference to Welsh Government policies/targets is welcomed, and Carmarthenshire County Council should make a commitment to developing policies to optimise renewable energy and low carbon energy generation as part of the process of preparing the Revised Local Development Plan.

**Response / Recommendation**

**Comments noted.**

**Paragraph 11.135**

**Representation(s)**

**Nature**

**1701** Natural Resources Wales (Miss Sharon Luke) [3253] **Support**

*Summary:*

We also welcome the commitment to help secure and protect carbon sinks (including peat) noted in section 11.135.

**Response / Recommendation**

**Support welcomed.**

**Representation(s)**

**Nature**

**828** Natural Resources Wales (Miss Sharon Luke) [3253] **Support**

*Summary:*

We welcome the commitment to help secure and protect carbon sinks (including peat) noted in section 11.135.

**Response / Recommendation**

**Support welcomed**

## Strategic Policy - SP16

### Representation(s)

### Nature

1641 Welsh Government (Mr Mark Newey) [13]

Comment

#### Summary:

Settlement Framework and Distribution (Policy SP16: Sustainable Distribution - Settlement Framework) - We note the authority's new spatial framework set out in SP16 differs from the adopted plan and adopts a 'cluster' approach. There are 6 clusters of functionally linked areas and within each cluster there are four tiers of settlements (Tier 1: Principal Centres, Tier 2: Service Centres, Tier 3: Sustainable Villages, Tier 4: Rural Villages). All settlements are 'predominantly' functionally linked within the cluster, with lower tier settlements linked to upper tier settlements that have more services and facilities. The WG does not object to the principle of this approach, the key concern is the scale of growth directed to each tier relative to the role and function and sustainability of places.

The Role and Function Topic Paper, includes an analysis of the key services and facilities within Tiers 1-3. The reasoned justification of SP16 states that growth will be broadly distributed as follows:

- Principal Centres 50-55% (will have a settlement boundary)
- Service Centres 15-20% (will have a settlement boundary)
- Sustainable Villages 15-20% (will have a settlement boundary)
- Rural Villages 15-20% and (no settlement boundary)
- Non Defined Rural Settlements (1%) (no settlement boundary)

The Welsh Government is concerned that the proposed scale and distribution of housing growth, particularly within Tiers 3 and 4 raises implications of sustainability and potentially negatively impacts on the Welsh language. It is unclear why the more sustainable Service Centres have been allocated the same proportion of growth as Tiers 3 and 4? In addition, it is also unclear why Rural Villages (Tier 4) that have no settlement boundaries, services or facilities would have the same growth levels/capacity as Tier 2 settlements? This point is re-enforced by the Role and Function Topic Paper which highlights that Tier 3 settlements - Sustainable Villages have in broad terms limited services and facilities. Tier 4 settlements are not even assessed. While the WG acknowledges the rural characteristics of Carmarthenshire, the scale and distribution of growth does not appear commensurate with the principles of sustainable development, nor the Councils own evidence within the SA or the Role and Function Paper. To summarise the Welsh Government has concerns about the scale of growth proposed to Tiers 3 and 4 of the settlement hierarchy conflicts with Planning Policy Wales.

To demonstrate delivery and sustainable distribution of growth across the settlement hierarchy the Deposit plan must; Identify spatial distribution and components of housing land supply as allocations, commitments and windfall sites (small and large) for each settlement tier in which they will be delivered (See LDP Manual, Ed 3).

The policy framework must clearly articulate the type and scale of development that would be appropriate at each tier of the hierarchy. Policy SP12 Rural Development needs strengthening in this respect.

### Response / Recommendation

**Noted. The scale and distribution of growth will be subject to further evidencing as part of the preparation of the Deposit LDP - including the proportions allocated to the respective tiers within the hierarchy.**

**Matters in relation to the Welsh language will be considered as part of the LDP's evidence base and within the Sustainability Appraisal. See representation 1647.**

### Representation(s)

### Nature

1638 Welsh Government (Mr Mark Newey) [13]

Comment

#### Summary:

The authority must fully justify/evidence that the growth levels are directed to the most sustainable places, related to the scale and location of housing need, not impacting negatively on the Welsh language and is realistic and deliverable.

### Response / Recommendation

**Noted. See representation 1647.**

**Representation(s)****Nature**

**1587**    **The Williams Family . [3585]**    **Comment**

**Agent: Savills (Mr Nick Heard) [3216]**

**Summary:**

Despite tripling the number of Service Centres, the amount of growth which is to be directed to them is, at most, to be doubled. From a purely mathematical perspective it is suggested that this percentage is too low.

The second is to stress the suitability of St Clears to accommodate further growth as a Service Centre. As discussed previously, the settlement is one of just six Service Centres which were included within the tier in the ALDP, has delivered the largest number and highest percentage of units out of all of the ALDP Service Centres demonstrating its ability to accommodate growth, has a broad range of services, and is strategically located at the junction of the A40 and the A477.

**Response / Recommendation**

**Comments Noted - Each settlement within the settlement hierarchy will be assessed in light of their potential for accommodating and delivering future development. Consideration will be given to those sites which have failed to deliver in the adopted LDP. This will be considered as part of the emerging evidence base leading into the publication of the Deposit LDP.**

**Representation(s)****Nature**

**647**    **WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**    **Comment**

**Summary:**

The respondent makes the following comments on the Preferred Strategy:

Strategic Policy SP16 indicates that the provision of growth and development will be directed to sustainable locations. Ffos Las is a sustainable location for continued investment. It lies contiguous with the settlement of Carway. There should be a presumption in favour of sustainable development at Ffos Las. It should lie within the defined settlement, where there is a presumption in favour sustainable development, provided the development accords with other local plan policies. It is logical therefore that the settlement framework reflects this.

**Response / Recommendation**

**Noted. The potential allocation of Ffos Las will be considered as part of the preparation of the Deposit LDP, and in accordance with the site assessment methodology.**

**Representation(s)****Nature**

**645**    **Simrock Holdings Ltd [3217]**    **Comment**

**Agent: Savills (Mr Nick Heard) [3216]**

**Summary:**

The removal of Llangennech from the Llanelli Growth Area is consistent with the approach taken through the DPS of removing surrounding settlements from the Principal Centres and giving them their own place in the settlement hierarchy. If CCC is to progress with this approach and Llangennech is to be a Service Centre, SHL would stress Llangennech's highly sustainable location for growth given its relationship with Llanelli, proximity to the local transport network, and strategic position between Carmarthenshire and Swansea.

**Response / Recommendation**

**Comments Noted. Each settlement within the settlement hierarchy will be assessed in light of their potential for accommodating and delivering future development. This will be considered as part of the emerging evidence base leading into the publication of the Deposit LDP.**

**Representation(s)****Nature****1714** Mr Steven Roberts [3020]

Object

**Summary:**

We object to draft Policy SP16 'Sustainable Distribution - Settlement Framework'. We maintain there is no cogent or compelling planning reason to consider Burry Port and Pembrey as one settlement. The apparent lack of detailed investigation into the relation between the two settlements undermines the coherence of draft Policy SP2. If this matter is not addressed, then there is a risk that subsequent iterations of the Plan will propose housing allocations at Pembrey, in locations which will necessitate the use of private vehicles and fail to contribute to sustainable development.

**Response / Recommendation**

**Disagree. The spatial proximity of Burry Port and Pembrey within this coastal location indicates a logical grouping of these settlements moving forward within the Llanelli cluster. It is important to note that in allocating sites for development in the Revised LDP, the forthcoming site assessment methodology will stress that the avoidance of inappropriate coalescence.**

**Representation(s)****Nature****1082** Cai Parry [822]

Object

**Summary:**

The wording of the Settlement Framework should be amended to reflect Bryn's status as part of the settlement boundary of Llanelli, which is defined as a 'Principal Centre' within the top tier of the Settlement Framework.

**Change To Plan Sought:**

The Tier 1 settlement within Cluster 2 should be defined as 'Llanelli / Bryn'.

**Response / Recommendation**

**Comment noted. Bryn similarly to other areas of Llanelli, such as Furnace, Llwynhendy etc, forms part of Cluster 2 Llanelli, and development will be apportioned to such locations accordingly. Being implicit that Bryn forms part of Llanelli, it is therefore not considered necessary to include Bryn in the SP 16: Sustainable Distribution - Settlement Framework flowchart.**

**Representation(s)****Nature****1740** Mr S Lloyd [3741]

Object

**Agent: JCR Planning Ltd (Richard Banks) [787]****Summary:**

Heol Ddu's categorisation as a Tier 4 settlement, (with no development limits) would suggest that it is in an isolated and unsustainable location, which is simply not the case. This classification is more perplexing when compared with other settlements that have been categorised as Tier 3 settlements which have a comparable or lower sustainable status than Heol Ddu when considering accessibility to community facilities and local services.

Heol Ddu can readily be considered as being a functioning part of the Ammanford/Cross Hands Tier 1 Principal Centre (Cluster 3), given its close physical proximity to Ammanford and adequate linking highway network.

**Response / Recommendation**

**Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.**

**This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.**

**Representation(s)**

**Nature**

**1742** Mr M Thomas [3749]

**Object**

**Agent: JCR Planning Ltd (Richard Banks) [787]**

**Summary:**

Having considered the various Tiers of the Settlement Framework, Pontantwn has been incorrectly categorised and should not be classed as a Tier 4 settlement. The settlement is located on a key transport corridor and forms one of a number of villages that serve the wider rural community between Carmarthen and Pontyates - a significantly sized area

Its classification as a Tier 4 settlement will result in it being unable to make a diverse contribution to the housing need of the local community, by virtue of the fact that the Preferred Strategy will not include development limits for settlements within this Tier

**Response / Recommendation**

**Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.**

**This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.**

**Representation(s)**

**Nature**

**1746** Mr M Thomas [3749]

**Object**

**Agent: JCR Planning Ltd (Richard Banks) [787]**

**Summary:**

It is considered that Cross Inn has been incorrectly categorised and should not be classed as a Tier 4 settlement. The settlement is located on a key transport corridor and forms one of a number of villages that serve the wider rural community between St. Clears and Laugharne.

Cross Inn is served by public transport, its classification as a Tier 4 settlement will result in it being unable to make a diverse contribution to the housing need of the local community, by virtue of the fact that the PS will not include development limits for settlements within this Tier.

**Response / Recommendation**

**Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.**

**This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.**



<i>Representation(s)</i>	<i>Nature</i>
<p><b>1774</b>    <b>Savills (Mr Nick Heard) [3216]</b></p> <p><i>Agent: Savills (Mr Nick Heard) [3216]</i></p> <p><i>Summary:</i></p> <p>In the Adopted LDP a four tier settlement hierarchy is in place consisting of three 'Growth Areas', six 'Service Centres', 11 'Local Service Centres', as well as a large number of 'Sustainable Communities'. St Clears, which includes Pwll Trap, is designated as a 'Service Centre', a tier which is expected to deliver 10% of housing allocations, and 9% of the total housing requirement.</p> <p>The approach that is proposed in Strategic Policy SP16 in the RLDP differs substantially, consisting of three 'Principal Centres', 18 'Service Centres', and a larger amount of both 'Sustainable Villages' and 'Rural Villages'. St Clears continues to be a 'Service Centre' a tier which is to accommodate between 10% and 20% of housing need.</p> <p>Despite tripling the number of Service Centres, the amount of growth which is to be directed to them is, at most, to be doubled. From a purely mathematical perspective it is suggested that this percentage is too low.</p> <p>In terms of the distribution of growth, The Williams Family suggest that fundamentally the Revised LDP needs to tackle issues relating to delivery and therefore a Spatial Option needs to be taken which recognises the rates of delivery of sites within settlements.</p>	<p><b>Object</b></p>

***Response / Recommendation***

**Comment Noted - Each settlement within the settlement hierarchy will be assessed in light of their potential for accommodating and delivering future development. Consideration will be given to those sites which have failed to deliver in the adopted LDP. This will be considered as part of the emerging evidence base leading into the publication of the Deposit LDP**

<i>Representation(s)</i>	<i>Nature</i>
<p><b>1775</b>    <b>Savills (Mr Nick Heard) [3216]</b></p> <p><i>Agent: Savills (Mr Nick Heard) [3216]</i></p> <p><i>Summary:</i></p> <p>Suitability of St Clears to accommodate further growth as a Service Centre. As discussed previously, the settlement is one of just six Service Centres which were included within the tier in the Adopted LDP, has delivered the largest number and highest percentage of units out of all of the Adopted LDP Service Centres demonstrating its ability to accommodate growth, has a broad range of services, and is strategically located at the junction of the A40 and the A477.</p> <p>In terms of the distribution of growth, The Williams Family suggest that fundamentally the Revised LDP needs to tackle issues relating to delivery and therefore a Spatial Option needs to be taken which recognises the rates of delivery of sites within settlements.</p>	<p><b>Object</b></p>

***Response / Recommendation***

**Comments Noted - Each settlement within the settlement hierarchy will be assessed in light of their potential for accommodating and delivering future development. Consideration will be given to those sites which have failed to deliver in the adopted LDP. This will be considered as part of the emerging evidence base leading into the publication of the Deposit LDP.**

**Representation(s)****Nature****270** JCR Planning Ltd (Mr Jason Evans) [2988]

Object

*Agent: JCR Planning Ltd (Mr Jason Evans) [2988]**Summary:*

We object on behalf of our Clients to the categorisation of Felindre (Llangadog) as a Tier 4 settlement.

**Response / Recommendation**

**Disagree-** The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.

This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.

**Representation(s)****Nature****216** JCR Planning Ltd (Mr Jason Evans) [2988]

Object

*Agent: JCR Planning Ltd (Mr Jason Evans) [2988]**Summary:*

We object to the Settlement Framework in terms of the settlement of Llansadwrn.

**Response / Recommendation**

**Noted.** The Revised LDP will be prepared in accordance with the provisions of PPW Ed. 10 and the councils Site Selection methodology. The reference to the candidate sites by the respondent is not a matter for consideration within the Draft preferred Strategy. Rather this will be considered as part of the preparation of the Deposit Plan.

**Representation(s)****Nature****218** JCR Planning Ltd (Mr Jason Evans) [2988]

Object

*Agent: JCR Planning Ltd (Mr Jason Evans) [2988]**Summary:*

We object on behalf of our Clients to the classification of Milo as a Tier 4 settlement.

**Response / Recommendation**

**Noted.** The Revised LDP will be prepared in accordance with the provisions of PPW Ed. 10 and the councils Site Selection methodology. The reference to the candidate sites by the respondent is not a matter for consideration within the Draft preferred Strategy. Rather this will be considered as part of the preparation of the Deposit Plan.

**Representation(s)****Nature****269** JCR Planning Ltd (Mr Jason Evans) [2988]

Object

*Agent: JCR Planning Ltd (Mr Jason Evans) [2988]**Summary:*

We object on behalf of our Clients to the classification of Felingwm Isaf as a Tier 4 settlement.

**Response / Recommendation**

**Noted.** The Revised LDP will be prepared in accordance with the provisions of PPW Ed. 10 and the councils Site Selection methodology. The reference to the candidate sites by the respondent is not a matter for consideration within the Draft preferred Strategy. Rather this will be considered as part of the preparation of the Deposit Plan.

**Representation(s)**

**Nature**

**217** JCR Planning Ltd (Mr Jason Evans) [2988]

**Object**

**Agent: JCR Planning Ltd (Mr Jason Evans) [2988]**

**Summary:**

We object on behalf of our Client to the categorisation of Whitemill as a Tier 4 settlement.

**Response / Recommendation**

**Noted. The Revised LDP will be prepared in accordance with the provisions of PPW Ed. 10 and the councils Site Selection methodology. The reference to the candidate sites by the respondent is not a matter for consideration within the Draft preferred Strategy. Rather this will be considered as part of the preparation of the Deposit Plan.**

**Representation(s)**

**Nature**

**550** JCR Planning Ltd (Mr Jason Evans) [2988]

**Object**

**Agent: JCR Planning Ltd (Mr Jason Evans) [2988]**

**Summary:**

We object on behalf of our Clients to the classification of Pontantwn as a Tier 4 settlement for the following reasons:

- it is located on a key transport corridor and forms one of a number of villages that serve the wider rural community between Carmarthen and Pontyates;
- it is served by a regular form of public transport,
- its classification as a Tier 4 settlement will result in it being unable to make a diverse contribution to the housing need of the local community, as it will not have development limits.
- comparable settlements in the County that have been categorised as Tier 3 settlements (such as Capel Dewi, Pentrecwrt, Rhydcymerau and Cwmdu) and yet have a comparable or lower sustainable status.

**Response / Recommendation**

**Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.**

**This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.**

**Representation(s)**

**Nature**

**286** JCR Planning Ltd (Mr Jason Evans) [2988]

**Object**

**Agent: JCR Planning Ltd (Mr Jason Evans) [2988]**

**Summary:**

We object on behalf of our Clients to the classification of Manordeilo as a Tier 4 settlement:

- it is at a sustainable location, located on the Strategic Highway Network, providing it with easy access to nearby settlements with their wide range of community facilities and local services.
- it is served by a regular form of public transport,
- its classification as a Tier 4 settlement will result in it being unable to make a diverse contribution to the housing need of the local community, as it will not have development limits.
- comparable settlements in the County that have been categorised as Tier 3 settlements (such as Capel Dewi, Pentrecwrt, Rhydcymerau and Cwmdu) and yet have a comparable or lower sustainable status than Pontantwn when considering its level of accessibility to the range of community facilities and local services nearby.

**Response / Recommendation**

**Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.**

**This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.**

<i>Representation(s)</i>	<i>Nature</i>
<b>1560</b> JCR Planning Ltd (Richard Banks) [787]	<b>Object</b>

*Summary:*

Object to the proposed settlement framework and request that it be amended to categorise Milo as a Tier 3 settlement

***Response / Recommendation***

**Disagree-** The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.

This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.

<i>Representation(s)</i>	<i>Nature</i>
<b>1557</b> JCR Planning Ltd (Richard Banks) [787]	<b>Object</b>

*Summary:*

Object to the proposed settlement framework and request that it be amended to categorise Mynyddcerrig as a Tier 3 settlement.

***Response / Recommendation***

**Disagree-** The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.

This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.

<i>Representation(s)</i>	<i>Nature</i>
<b>1558</b> JCR Planning Ltd (Richard Banks) [787]	<b>Object</b>

*Summary:*

Object to the proposed settlement framework and request that it be amended to categorise Capel Seion as a Tier 3 settlement.

***Response / Recommendation***

**Disagree-** The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.

This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.

**Representation(s)****Nature****1562 JCR Planning Ltd (Richard Banks) [787]****Object****Summary:**

Object to the proposed settlement framework and request that it be amended to categorise Waunystad Meurig as a Tier 3 settlement.

**Response / Recommendation**

**Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.**

**This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.**

**Representation(s)****Nature****1554 JCR Planning Ltd (Richard Banks) [787]****Object****Summary:**

Object to the proposed settlement framework and request that it be amended to categorise Heol Ddu as a Tier 3 settlement.

**Response / Recommendation**

**Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.**

**This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.**

**Representation(s)****Nature****566 JCR Planning Ltd (Mr Jason Evans) [2988]****Object****Agent: JCR Planning Ltd (Mr Jason Evans) [2988]****Summary:**

We have been instructed by our Clients to object to the classification of Penybanc as a Tier 4 settlement, it should be classified as a Tier 3 settlement for the following reasons:

- it is intrinsically linked to the larger nearby town of Llandeilo (Tier 2);
- it is well served by public transport, and well positioned to the County's Strategic Highway Network;
- Llandeilo faces a range of physical constraints with respect to its future growth, Penybanc plays a similar role in terms of facilitating the growth of the Town as Rhosmaen and Ffairfach.

Penybanc is sustainable from an accessibility and transportation perspective.

Previous development plans have provided limited (if any) opportunities for growth within Penybanc, as a result, the area has had its growth somewhat stifled, resulting in the use of community facilities and local services declining, and in some cases closing. This trend must be halted and its proportionate growth facilitated.

**Response / Recommendation**

**Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.**

**This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.**

**Representation(s)**

**Nature**

**1564** JCR Planning Ltd (Richard Banks) [787]

**Object**

**Summary:**

Object to the proposed settlement framework and request that it be amended to categorise Four Roads as a Tier 3 settlement. We trust that this objection will be given full consideration by the Authority.

**Response / Recommendation**

**Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.**

**This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.**

**Representation(s)**

**Nature**

**259** JCR Planning Ltd (Mr Jason Evans) [2988]

**Object**

**Agent: JCR Planning Ltd (Mr Jason Evans) [2988]**

**Summary:**

We object on behalf of our Clients to the categorisation of Pentregwenlais Road as being part of the settlement of Pentregwenlais and not Llandybie. This area should form part of Llandybie for the following reasons:

- it forms part of the ward of Llandybie;
- it is a continuation of, and is attached to Llandybie;
- it lies on one of the key access routes serving the County;
- it is within walking distance of all of the key local services and community facilities.

Concern is raised that if the area remains within Pentregwenlais, it will form part of a Tier 4 and not Tier 1 settlement and will not benefit from defined development limits.

**Response / Recommendation**

**Disagree- The Council considers that the allocation of the settlement within the hierarchy is reflective of its position, and the services and facilities it provides. Whilst tier 4 settlements will not have development limits, a criteria based policy is considered appropriate to allow sensible small scale development within these villages.**

**This will be further elaborated in the Role and Function Paper as the Plan leads towards the publication of the Deposit.**

**Representation(s)**

**Nature**

**26** Carmarthenshire County Council (Mr Stuart Walters) [2345]

**Support**

**Summary:**

We support the principles that underline the SP16 - Sustainable Distribution - Settlement Framework and in particular like that "the principal centres will be the main focus of growth, with its precise spread across the County being responsive and not constrained by a rigid proportional distribution."

**Response / Recommendation**

**Support welcomed.**

<i>Representation(s)</i>		<i>Nature</i>
<b>2042</b>	<b>Persimmon Homes West Wales (Mrs Kate Harrison) [3410]</b>	<b>Support</b>

*Summary:*

SP16 'Sustainable Distribution - Settlement Framework' directs the provision of growth and development to sustainable locations. This takes a 4 tiered approach in terms of the settlement framework. These include the principal centres, the service centres, sustainable villages and rural villages. The principal centres remain as Carmarthen, Llanelli and Ammanford/Cross Hands, which includes Gorslas, where the majority of development will be directed. Fforest/Hendy is defined as a Service Centre in Cluster 2 where 15-20% of development will be directed. We support the provision of Housing Allocations in Principal Centres and Service Centres

*Response / Recommendation*

**support welcomed.**

<i>Representation(s)</i>		<i>Nature</i>
<b>545</b>	<b>RSAl [3167]</b>	<b>Support</b>

*Agent: Lichfields (Mr Arwel Evans) [3166]*

*Summary:*

Support the categorisation of Llangennech as a Tier 2 Service Centre within Cluster 2. We consider that this is appropriate due to the wide variety of facilities and services within the settlement.

Consider that our client's site is sustainably located with regards to the facilities and services of Llangennech and therefore ideally placed to come forward as a housing allocation.

*Response / Recommendation*

**Support welcomed.**

<i>Representation(s)</i>		<i>Nature</i>
<b>2024</b>	<b>Swallow Investments Limited [3995]</b>	<b>Support</b>

*Summary:*

Strategic Policy SP16 sets out the County's Settlement Framework, based upon a four Tier Settlement Hierarchy and with the County divided into six Settlement Clusters. My client supports Strategic Policy SP16, in particular the designation of Ammanford /Crosshands as a Tier 1 Principal Centre at the top of the Settlement Hierarchy in the County's Settlement Cluster 3. In this respect, Ammanford /Crosshands is an highly sustainable location to which new housing and employment development should be directed; and it is entirely appropriate for the settlement to be positioned at the top of the County's Settlement Hierarchy.

*Response / Recommendation*

**Support welcomed.**

## Paragraph 11.137

### *Representation(s)*

### *Nature*

546 RSAI [3167]

Support

*Agent: Lichfields (Mr Arwel Evans) [3166]*

#### *Summary:*

We support paragraph 11.137 which states that the Plan will seek to distribute growth and development across the County having regard to the spatial strategy and spatial framework and national policy. We support the fact that the Plan will have regard to the role and function of settlements.

We consider that the spatial framework identified provides a sound basis for delivering sustainable development in areas which also present employment opportunities (such as Llangennech). This would ensure that housing and employment uses co-exist meaning that jobs can be easily reached by sustainable forms of transport such as walking and cycling.

### *Response / Recommendation*

**Support welcomed.**

## Paragraph 11.138

### *Representation(s)*

### *Nature*

1758 City & County of Swansea (Mr Tom Evans) [3761]

Comment

#### *Summary:*

Section 5: Consideration of other strategies -The reference in the detailed section of the report to the cross boundary role and function of some settlements is welcomed. However, we suggest that the evidence base could usefully be strengthened by consideration of how the spatial strategies and settlement hierarchies of neighbouring plan areas will affect the role and function of settlements.

Para 6.57 of the Topic paper relating to the role of Hendy/Forest (Cluster 2) makes a welcome reference to the Swansea LDP Strategic Site allocation at SD A: Land at Pontarddulais and the need to consider the cross border implications on housing numbers as part of the revised LDP. The Topic Paper could be usefully strengthened by way of reference to the cross boundary role of settlements, particularly within the wider region. For example, consideration of commuting and shopping trip patterns.

### *Response / Recommendation*

**Comments noted / welcomed. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard. Reference is made to the Role and Function Topic Paper which will evolve as the plan making process proceeds towards deposit.**

## Paragraph 11.140

### *Representation(s)*

### *Nature*

2025 Swallow Investments Limited [3995]

Support

#### *Summary:*

The respondent supports paragraphs 11.140 and 11.141 of the LDP, in that they confirm that the Principal Centres will be the main focus of growth over the LDP period, accommodating between 50-55% of the County's new housing growth

### *Response / Recommendation*

**Support Welcomed**



## Paragraph 11.141

### Representation(s)

### Nature

1634 Welsh Government (Mr Mark Newey) [13]

Comment

#### Summary:

The WG does not have significant concerns with the ethos and objectives of what the Preferred Strategy is seeking to achieve, nor the approach to Clusters within the settlement hierarchy. However, the Welsh Government is concerned that the proposed distribution of housing growth, particularly within settlement Tiers 3 and 4, raises sustainability issues based on the role and function of places. Acknowledging the rural characteristics of Carmarthenshire, the scale and distribution of growth at Tier 3 & 4 settlements does not align with the principles of sustainable development, PPW or the Council's own evidence (Sustainability Appraisal and the Role and Function of Settlements Paper) and has the potential to have an adverse impact on the Welsh language.

### Response / Recommendation

**Noted. The scale and distribution of growth will be subject to further evidencing as part of the preparation of the Deposit LDP - including the proportions allocated to the respective tiers within the hierarchy.**

### Representation(s)

### Nature

1083 Cai Parry [822]

Object

#### Summary:

The indicative apportionment directs too much growth to the less sustainable settlements. PPW states that development should reduce reliance upon the private car.

#### Change To Plan Sought:

The indicative apportionment should be amended such that it directs a greater proportion of development to the top tiers of the Settlement Framework. A suggested apportionment is set out below:

- \* Principal Centre - 60%;
- \* Service Centre - 20%;
- \* Sustainable Villages - 15%;
- \* Rural Villages - 5%;
- \* Non-Defined Rural Settlements - <1%.

### Response / Recommendation

**Comments Noted. The Council considers that the indicative apportionment of residential growth by tier is based on a sound and reasonable assessment, by identifying a number of factors which influence it. However, the indicative apportionment affords an allowance in to be made; the level of flexibility allowance will continue to be informed by the emerging evidence base leading up to the publication of the Deposit LDP.**

### Representation(s)

### Nature

547 RSAI [3167]

Object

Agent: Lichfields (Mr Arwel Evans) [3166]

#### Summary:

A robust evidence base is required before the apportionment of growth in each tier is confirmed.

#### Change To Plan Sought:

The apportionment of dwellings in the hierarchy should not be prejudged before carrying out a thorough assessment of the sustainability, suitability and deliverability of the candidate sites

### Response / Recommendation

**Comments Noted. The Council as part of the LDP process are reviewing all existing housing allocations sites to identify those that are not contributing to the LDP strategy, and a wide ranging assessment is being undertaken to make sure that the most appropriate sites are allocated in the revised Plan. This will be reflected within the apportionment of sites within each cluster and tier.**

<i><b>Representation(s)</b></i>	<i><b>Nature</b></i>
<p><b>2104</b>    <b>Union Tavern Estate [3913]</b></p> <p><i>Agent: Barton Willmore (Joe Ayoubkhani) [646]</i></p> <p><i>Summary:</i></p> <p>We support the indicative apportionment of residential growth by tiers - outlined in Paragraph 11.141 as being:</p> <ul style="list-style-type: none"> <li>* Principal Centre 50 - 55%;</li> <li>* Service Centre 15 - 20%;</li> <li>* Sustainable Villages 15 - 20%;</li> <li>* Rural Villages 15- 20%; and</li> <li>* Non-Defined Rural Settlements &lt; 1%.</li> </ul> <p>Gorlas is identified within the Settlement Framework as part of the Tier 1 Principal Centre Cluster of Ammanford/Crosshands. Whilst no explicit amendments are required within the Preferred Strategy, it should be noted that Gorlas has a range of facilities and services and there are proposals for a new Welsh-medium school to be located within the village.</p> <p>The settlement moreover has a close functional relationship with Cross Hands, which includes a further range of facilities and employment opportunities. The Strategic Spatial Options and Settlement Hierarchy Topic Paper to the LDP (Revised June 2013) identified that Gorlas formed part of the Ammanford/Cross Hands settlement grouping which scored the highest points score (of 49 points) when considering access to facilities and services.</p>	<p><b>Support</b></p>

***Response / Recommendation***

**Support Welcomed**

**Paragraph 11.145**

<i><b>Representation(s)</b></i>	<i><b>Nature</b></i>
<p><b>1057</b>    <b>JCR Planning Ltd (Mr Jason Evans) [2988]</b></p> <p><i>Agent: JCR Planning Ltd (Mr Jason Evans) [2988]</i></p> <p><i>Summary:</i></p> <p>We submit a holding objection to Policy 16 until further detail on the criteria to be used in relation to growth in Rural Villages is published.</p> <p><i>Change To Plan Sought:</i></p> <p>To be confirmed.</p>	<p><b>Object</b></p>

***Response / Recommendation***

**Comment noted. The Council will seek to address the content and criteria of the Policy within the Deposit LDP.**

<i><b>Representation(s)</b></i>	<i><b>Nature</b></i>
<p><b>548</b>    <b>RSAl [3167]</b></p> <p><i>Agent: Lichfields (Mr Arwel Evans) [3166]</i></p> <p><i>Summary:</i></p> <p>We agree that the Service Settlements are appropriate areas in principle to accommodate housing allocations (paragraph 11.145).</p>	<p><b>Support</b></p>

***Response / Recommendation***

**Support welcomed.**

**Representation(s)****Nature**

**2026** Swallow Investments Limited [3995] **Support**

**Summary:**

The respondent supports paragraph 11.145 of the LDP, in that it confirms Housing Allocations (defined in paragraph 11.35 of the LDP as sites capable of accommodating 5 dwellings and above) will be directed to the County's Principal Centres.

**Response / Recommendation**

**Support Welcomed**

**Strategic Policy - SP17****Representation(s)****Nature**

**1751** City & County of Swansea (Mr Tom Evans) [3761] **Comment**

**Summary:**

We welcome the opportunity to work in partnership during the Deposit preparation and particularly in relation to the need to consider the impact of Carmarthenshire's growth and spatial strategy upon the cross-boundary and wider regional highways network, which we recommend should be undertaken in consultation with Swansea traffic engineers utilising the Swansea Strategic Transport Model1. (See EB024a Strategic Transport Assessment 2015 (PDF, 7MB) and associated appendices)

**Response / Recommendation**

**Comments noted. The Council looks forward to continuing its constructive dialogue with the respondent as the Plan making process proceeds towards the Deposit LDP and the input provided by the respondent to date is duly welcomed in this regard. . The Council fully recognises that this is a key trans-boundary issue and as such it will be given due consideration.**

**Representation(s)****Nature**

**1596** mr william Phillips [3566] **Comment**

**Summary:**

It is difficult to disagree with the Strategic Policy (SP17). It is the implementation of the Policy that is lamentable. In the Bryn & Bynea areas of Llanelli the transport infrastructure is very deficient, with over 200 homes, from the previous LDP, yet to be completed. Traffic congestion is bad and getting worse, on the M4, through Llangennech to Bryn, with traffic to and from Loughor bridge - Llanelli providing additional congestion to Station Road, Bynea and to Bryn and Llangennech. Forward Planning should not be duped by the fanciful reports from the Agents of prospective Developers.

**Response / Recommendation**

**Support welcomed for SP17. In relation to the comments with regards to highway capacity, the deposit LDP will need to be supported by robust evidence - including on the area's infrastructural capacity.**

**Representation(s)****Nature**

**27** Carmarthenshire County Council (Mr Stuart Walters) [2345] **Support**

**Summary:**

SP17 - Transport & Accessibility - We support the principles contained with this policy, and welcome the recognition that the county is different in terms of transport requirements in particular that the rural areas are likely to be dependent on the car and this needs to be recognised during the plan period. We also support the promotion of the county as a centre for cycling for Wales and its importance as a future economic driver.

**Response / Recommendation**

**Support welcomed.**

**Representation(s)****Nature****1084** Cai Parry [822]**Support****Summary:**

Planning Policy Wales (Edition 10, p. 18) seeks to ensure that the planning system contributes to the long-term economic well-being of Wales, by making use of existing infrastructure and facilities. Moreover, paragraph 3.38 states that "an important consideration will be minimising the need to travel, reducing the reliance on the private car and increasing walking, cycling and use of public transport". Accordingly, we consider that Strategic Policy SP 17 complies with Planning Policy Wales and therefore the wording is strongly supported by BDW Homes.

**Response / Recommendation****Support Welcomed.****Strategic Policy - SP18****Representation(s)****Nature****1650** Welsh Government (Mr Mark Newey) [13]**Comment****Summary:**

The Deposit Plan should reference the landbank requirements set out in the Regional Technical Statement (RTS) and state how the LDP will satisfy these. We do not agree with the statement in paragraph 11.155 that "the County's landbank figures, for both hard rock and sand and gravel, are notably in excess of the minimum requirements set out in MTAN 1, and consequently there is no requirement to allocated new sites for mineral development". The RTS (endorsed 2014) states there is an under provision of 2.94mt of sand and gravel reserves within the region of Carmarthenshire, Ceredigion and Pembrokeshire (including the National Park). These authorities should work collaboratively to address the shortfall and identify specific sites.

**Response / Recommendation**

**Noted. The Deposit LDP will set out the landbank requirements as set out in the Regional Technical Statement (RTS). The comments by the respondent in respect of para 11.155 are duly noted and will be amended as part of the Deposit LDP to reflect the requirements of the RTS. It should be noted that the Council has undertaken a 'Call for Sand and Gravel Sites' in response to this matter.**

**Representation(s)****Nature****1656** Simon Chaffe [855]**Comment****Summary:**

Strategic Policy SP18: Mineral Resources

a) We propose that a reference be added to duration of the requirement for minimum landbanks for crushed rock and sand and gravel to be retained throughout the whole of the plan period, that is, 10 and 7 years respectively. To be explicit, at the end of the Plan Period there needs to be a minimum landbank of crushed rock of 10 years and for sand and gravel of 7 years.

**Response / Recommendation**

**Noted. The Deposit LDP will set out the landbank requirements as set out in PPW and MTAN 1. The comments by the respondent in respect of Strategic policy SP 18 criterion a) are duly noted. Any necessary amendments to policy wording will be carried out as part of the Deposit LDP to reflect the requirements of national planning policy.**

**Representation(s)****Nature****1659** Simon Chaffe [855]**Comment****Summary:**

d) Buffer Zones should not be applied prescriptively by arbitrary distances but judged on a 'case by case' basis.

**Response / Recommendation**

**Noted. The comments by the respondent in respect of Strategic Policy SP 18 criterion d) are duly noted. The Deposit LDP will set out appropriate buffer zones around extant mineral sites in accordance with the requirements set out within Planning Policy Wales (PPW) Ed.10 and the MTANs.**

**Representation(s)****Nature****1658** Simon Chaffe [855]**Comment****Summary:**

c) Please clarify how, and at what stage in the plan making process, Safeguarding Areas would be defined. These Areas need to apply not only to the mineral resource but also the wider areas that may be affected.

**Response / Recommendation**

**In response to the respondent's query regarding safeguarding areas, such areas will be defined as part of the preparation of the Deposit LDP, and will utilise the British Geological Survey's (BGS) Aggregates Safeguarding Map for South West Wales (which identify more specific areas than those contained within the BGS Mineral Resource Maps). The safeguarding areas will be defined on the LDP Proposals Map and the Written Statement will contain the written policy.**

**Representation(s)****Nature****2314** The Coal Authority (Melanie Lindsley) [4000]**Comment****Summary:**

As you will be aware the Carmarthenshire area has significant coal mining legacy. The Coal Authority provides the LPA with downloadable data in respect of Development Risk and Surface Coal Resource plans. We would expect any sites being considered for allocation within the plan to be assessed against this information. This is to ensure that any issue or potential constraints, identified in respect of the quantum of development which can be accommodated on a site is identified at as early a stage as possible.

**Response / Recommendation**

**Comment noted.**

<i>Representation(s)</i>	<i>Nature</i>
<b>1781</b> Mineral Products Association Wales (Mr Nick Horsley) [3778]	<b>Object</b>

*Summary:*

In order to provide consistency with PPW and MTAN1 and for greater clarity we suggest modifying the wording of a) by changing "hard rock" to "crushed rock". Further it would be prudent to clarify the landbank requirements by adding the following wording to point a) A minimum ten-year landbank of crushed rock and minimum seven-year landbank for sand and gravel should therefore be maintained during the entire plan period.

*Change To Plan Sought:*

The amended text would read:- "Ensuring supply by maintaining an adequate landbank of permitted aggregate reserves (hard crushed rock and sand and gravel) throughout the Plan period. A minimum ten-year landbank of crushed rock and minimum seven-year landbank for sand and gravel should therefore be maintained during the entire plan period".

***Response / Recommendation***

**Noted. The Deposit LDP will set out the landbank requirements as set out in PPW, MTAN 1. The comments by the respondent in respect of Strategic policy SP 18 criterion a) are duly noted. Any necessary amendments to policy wording will be carried out as part of the Deposit LDP to reflect the requirements of national planning policy.**

<i>Representation(s)</i>	<i>Nature</i>
<b>1780</b> Mineral Products Association Wales (Mr Nick Horsley) [3778]	<b>Object</b>

*Summary:*

Reference is made to mineral resources; however, the policy appears only to address aggregates. The SWRAWP annual monitoring report refers to non-aggregate mineral resources in Carmarthenshire. These should be reflected in the policy.

*Change To Plan Sought:*

Amend accordingly.

***Response / Recommendation***

**Noted. The comments by the respondent in respect of Strategic Policy SP 18 are duly noted. Any necessary amendments to wording will be considered as part of the preparation of the Deposit LDP, to ensure that it accords with PPW and the MTANs.**

<i>Representation(s)</i>	<i>Nature</i>
<b>1782</b> Mineral Products Association Wales (Mr Nick Horsley) [3778]	<b>Object</b>

*Summary:*

It should be made clear that sterilisation of a mineral resource may be as a result of the proximity of development not just by development directly upon a resource. The policy is not clear as to how the safeguarding areas will be identified within the LDP, it is assumed by the use of mineral safeguarding maps. We would be happy to discuss the resources to be safeguarded with the Council.

*Change To Plan Sought:*

Amend the text to read "Safeguarding areas underlain by minerals of economic importance where they could be worked in future to ensure that such resources are not unnecessarily sterilized by other forms of development either directly or within close proximity to the safeguarded resource. Minerals safeguarding maps will be included within the LDP".

***Response / Recommendation***

**Noted. The comments by the respondent in respect of mineral safeguarding (within Strategic Policy SP 18) are duly noted. Detailed policy matters concerning mineral safeguarding (including the respondent's suggested wording) will be addressed during preparation of the Deposit LDP, to ensure that it accords with the requirements set out within PPW and the MTANs.**

<i>Representation(s)</i>	<i>Nature</i>
<b>1784</b> Mineral Products Association Wales (Mr Nick Horsley) [3778]	<b>Object</b>
<i>Summary:</i>	
It would be helpful to clarify how the buffer zones will be applied. Buffer zones provide areas of protection around permitted and proposed mineral workings where new development which would be sensitive to adverse impact, including residential areas, hospitals and schools, should be resisted.	
<i>Change To Plan Sought:</i>	
Amend the text to read "The use of Buffer Zones to reduce the conflict between mineral development and sensitive development. These Buffer Zones will provide areas of protection around permitted and proposed mineral workings where new development which would be sensitive to adverse impact, including residential areas, hospitals and schools, should be resisted."	

**Response / Recommendation**

**Noted. The comments by the respondent in respect of mineral buffer zones (within Strategic Policy SP 18) are duly noted. Detailed policy matters concerning the use of buffer zones (including the respondent's suggested wording) will be addressed during preparation of the Deposit LDP, to ensure that it accords with the requirements set out within PPW and the MTANs.**

<i>Representation(s)</i>	<i>Nature</i>
<b>28</b> Carmarthenshire County Council (Mr Stuart Walters) [2345]	<b>Support</b>
<i>Summary:</i>	
SP18 - Mineral Resources - policy noted.	

**Response / Recommendation**

**Support welcomed.**

<i>Representation(s)</i>	<i>Nature</i>
<b>1710</b> Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326]	<b>Support</b>
<i>Summary:</i>	
Support the compatibility of approach between the Plans. The terrestrial sand and gravel landbank and apportionment of provision to meet future needs is considered on a regional basis.	
The regional landbank for sand and gravel is rather limited compared with that available for hard rock. Sand and gravel production in the region are of limited capacity.	
New terrestrial production sites within the region but outside the Park are needed.	
Carmarthenshire's landbank figures for hard rock and sand and gravel are in excess of the minimum requirements set out in MTAN1, therefore there is no requirement to allocate new mineral sites.	

**Response / Recommendation**

**Support welcomed.**

**Representation(s)****Nature****1657** Simon Chaffe [855]**Support****Summary:**

(b) SUPPORT

'Encouraging the efficient and appropriate use of high quality minerals and maximising the potential for the re-use and recycling of suitable minerals as an alternative to primary won aggregates;'

**Response / Recommendation****Support welcomed.****Representation(s)****Nature****1020** The Coal Authority (Mr Christopher Telford) [2376]**Support****Summary:**

The Coal Authority supports the inclusion of this policy.

**Response / Recommendation****Support welcome.****Paragraph 11.153****Representation(s)****Nature****1660** Simon Chaffe [855]**Comment****Summary:**

Amendment to the paragraph to read

..the County protects mineral resources and provides mineral reserves...'

There should be opportunities for extensions to existing operational quarries with limited permitted mineral reserves where landbanks are in excess of the minimum periods. There can be a reluctance on the part of MPA to grant PP that would have the effect of extending them significantly. However, granting such PP may safeguard mineral resources from sterilisation, secure their prudent use and facilitate the management and protection of existing amenity and the environment. We believe that these circumstances should be explicitly recognised in the Preferred Strategy.

**Response / Recommendation**

**Noted. The comments by the respondent in respect of Paragraph 11.153 are duly noted. The wording of policies and supporting text will be addressed during production of the Deposit LDP, to ensure that they are in accordance with national planning policy.**

**Representation(s)****Nature****1786** Mineral Products Association Wales (Mr Nick Horsley) [3778]**Object****Summary:**

We would suggest use of the word "reserves" rather than "resources" as reserves are resources with planning permission which can readily be worked.

**Change To Plan Sought:**

Amend the text to read "The LDP should ensure that the County provides mineral resources reserves to meet society's needs...."

**Response / Recommendation**

**Noted. The comments by the respondent in respect of Strategic Policy SP 18 are duly noted. Any necessary amendments to wording will be considered as part of the preparation of the Deposit LDP, to ensure that it accords with PPW and the MTANs.**



## Paragraph 11.155

### *Representation(s)*

### *Nature*

**1787** Mineral Products Association Wales (Mr Nick Horsley) [3778]

**Object**

#### *Summary:*

As mentioned above, reference to "hard rock" should be amended to "crushed rock" for consistency. As also referred to above the RTS is a document of influence to the plan. The RTS is currently under formal review by Welsh Government with the 2nd review anticipated for completion by Q1, 2020. This review will run in parallel to the revised Preferred Strategy for the LDP and is therefore a material consideration. It is also notable that Carmarthenshire has the third highest housing projection in adopted LDPs. Whilst housing numbers may well be amended under the revised LDP, there is a recognition that historic sales of aggregates may not be the appropriate methodology to predict future aggregate requirements, in light of growth aspirations. Low production tonnages coupled with healthy reserves create long landbanks. The SWRAWP AMR states that "care must be exercised in relying on the landbank figures for ..... Carmarthenshire as these are based on very small annual sales from relatively small sites." Sales alone may not represent a true reflection of aggregate usage within an area. Further, the current consultation is coupled with a call for candidate Sand and Gravel Sites. The final sentence should therefore be amended.

#### *Change To Plan Sought:*

The text should be amended to read "The South Wales RTS 2014 sets out the contribution that each constituent local authority should make towards meeting the regional demand for aggregates (both hard crushed rock and sand and gravel). The LDP's second Annual Monitoring Report (AMR 2016/17) establishes that the County's landbank figures, for both hard crushed rock and sand and gravel, is notably in excess of the minimum requirements set out in MTAN1: Aggregates, and consequently there is no requirement the need to allocate new sites for minerals development will be considered in line with the requirements of the developing RTS and the current call for sites."

### *Response / Recommendation*

**Noted. The comments by the respondent in respect of Strategic Policy SP 18 are duly noted. Any necessary amendments to wording will be considered as part of the preparation of the Deposit LDP. Such amendments will ensure that it accords with PPW, the MTANs and acknowledges the authority contributions towards meeting the regional demand for aggregates set out within the RTS.**

### *Representation(s)*

### *Nature*

**1661** Simon Chaffe [855]

**Object**

#### *Summary:*

RTS 2014 Appx B pp27 (Carmarthenshire) states,  
'To address the resulting sand & gravel shortfall, new allocations totalling at least 2.94 million tonnes will need to be identified within the LDPs of one or more of the four authorities over which the apportionment is shared.'

This RTS is currently being reviewed by Welsh Government with completion expected early next year.

The reference in the final sentence to there being no requirement to allocate new sites for mineral development is at odds with the above and the Sand & Gravel Call for Sites. This whole paragraph should therefore be redrafted.

### *Response / Recommendation*

**Noted. The comments by the respondent in respect of paragraph 11.155 are duly noted. The Deposit LDP will set out the landbank requirements in accordance with the Regional Technical Statement (RTS), and any necessary amendments to wording will be made as part of the Deposit LDP.**

## Strategic Policy - SP19

### Representation(s)

### Nature

**1662** Simon Chaffe [855] **Comment**

#### Summary:

a) We propose that this part be re-drafted as follows:

'The allocation of additional adequate appropriate land to provide, in association with existing waste management facilities\*', for an integrated network of waste management facilities.'

\* These to be defined in an appendix as in Appendix 6 of the LDP (adopted 2014) and, for the avoidance of doubt, to include New Lodge, Cwmgwili.

### Response / Recommendation

**Noted. The comments by the respondent in respect of Strategic Policy SP 19 criterion a) are duly noted. The wording of this policy and its supporting text will be addressed during production of the Deposit LDP, to ensure that they are in accordance with national planning policy.**

### Representation(s)

### Nature

**29** Carmarthenshire County Council (Mr Stuart Walters) [2345] **Support**

#### Summary:

Waste Management - policies noted.

### Response / Recommendation

**Comments noted.**

### Representation(s)

### Nature

**1711** Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326] **Support**

#### Summary:

Both authorities' policies on waste management are broadly aligned. Carmarthenshire acknowledges TAN 21 and the need for collaboration between local planning authorities to progress towards an integrated and adequate network for waste management.

### Response / Recommendation

**Support Welcomed**

### Representation(s)

### Nature

**1663** Simon Chaffe [855] **Support**

#### Summary:

b) SUPPORT

'Support proposals for waste management which involve the management of waste in accordance with the waste hierarchy;'

### Response / Recommendation

**Support welcomed.**

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***Representation(s)***

***Nature***

**1664** Simon Chaffe [855]

**Support**

***Summary:***

(c) SUPPORT

'Acknowledging that certain types of waste facility may need to be located outside the development limits of settlements;'

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***Response / Recommendation***

**Support welcomed.**

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