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**MONDAY, 14 DECEMBER 2020**

**TO: ALL MEMBERS OF THE EXECUTIVE BOARD**

I HEREBY SUMMON YOU TO ATTEND A **VIRTUAL MEETING** OF THE **EXECUTIVE BOARD AT 10.00 AM, ON MONDAY, 21<sup>ST</sup> DECEMBER, 2020** FOR THE TRANSACTION OF THE BUSINESS OUTLINED ON THE ATTACHED AGENDA

*Wendy Walters*

**CHIEF EXECUTIVE**

<b>Democratic Officer:</b>	<b>Michelle Evans Thomas</b>
<b>Telephone (direct line):</b>	<b>01267 224030</b>
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Wendy Walters Prif Weithredwr, *Chief Executive*,  
Neuadd y Sir, Caerfyrddin. SA31 1JP  
*County Hall, Carmarthen. SA31 1JP*

# EXECUTIVE BOARD

## MEMBERSHIP - 10 MEMBERS

<b>Councillor</b>	<b>Portfolio</b>
<b>Emlyn Dole</b>	<b>Leader</b> Corporate Leadership and Strategy; Chair of Executive Board; Represents Council at WLGA; Economic Development Represents the Council on the Swansea Bay City Region; Collaboration; Marketing and Media; Appoints Executive Board Members; Determines EBM Portfolios; Liaises with Chief Executive; Public Service Board
<b>Mair Stephens</b>	<b>Deputy Leader</b> Council Business Manager; Human Resources; Performance Management; Wales Audit; Training; I.C.T.; T.I.C. (Transformation, Innovation and Change); Strategic Planning
<b>Cefin Campbell</b>	<b>Communities and Rural Affairs</b> Rural Affairs and Community Engagement; Community Safety; Police; Counter-Terrorism and Security Act 2015; Tackling Poverty; Wellbeing of Future Generations; Third Sector Liaison ;Equalities, Climate Change Strategy.
<b>Glynog Davies</b>	<b>Education and Children</b> Schools; Children's Services; Special Education Needs; Safeguarding; Respite Homes; Regional Integrated School; Improvement Service; Adult Community Learning; Youth Services; School Catering Services, Lead Member for Children and Young People; Youth Ambassador
<b>Hazel Evans</b>	<b>Environment</b> Refuse; Street Cleansing; Highways and Transport Services; Grounds Maintenance; Building Services; Caretaking; Building Cleaning; Emergency Planning; Flooding, Public Rights of Way.
<b>Linda Evans</b>	<b>Housing</b> Housing – Public; Housing – Private, Ageing Well
<b>Peter Hughes Griffiths</b>	<b>Culture, Sport and Tourism</b> Town and Community Councils Ambassador; Development of the Welsh Language; Theatres; Sports; Leisure Centres; Museums; Libraries; Country Parks; Tourism.
<b>Philip Hughes</b>	<b>Public Protection</b> Trading Standards; Environmental Health. Environmental Enforcement; Planning enforcement; Unlicensed Waste; Parking Services; Bio diversity
<b>David Jenkins</b>	<b>Resources</b> Finance & Budget; Corporate Efficiencies; Property/Asset Management; Procurement; Housing Benefits; Revenues; Statutory Services (Coroners, Registrars, Electoral, Lord Lieutenancy); Armed Forces Champion Contact Centres and Customer Service Centres
<b>Jane Tremlett</b>	<b>Social Care &amp; Health</b> Adult Social Services; Residential Care; Home Care; Learning Disabilities; Mental Health; NHS Liaison/Collaboration/ Integration; Care Home Catering Services, Carers' Champion; Dementia Care Champion; Disability Ambassador

# **A G E N D A**

1. **APOLOGIES FOR ABSENCE.**
2. **DECLARATIONS OF PERSONAL INTEREST.**
3. **TO SIGN AS A CORRECT RECORD THE MINUTES OF THE MEETING OF THE EXECUTIVE BOARD HELD ON THE:-**
  - 3 .1 **30<sup>TH</sup> NOVEMBER 2020** 5 - 10
  - 3 .2 **23<sup>RD</sup> NOVEMBER 2020** 11 - 12
4. **QUESTIONS ON NOTICE BY MEMBERS**
5. **PUBLIC QUESTIONS ON NOTICE**
6. **PROPOSAL TO SHORTEN THE INTERNAL SCHOOL ORGANISATION DECISION MAKING AND DETERMINATION PROCESS** 13 - 22
7. **PROPOSAL TO RELOCATE YSGOL HEOL GOFFA TO A NEW SITE AND INCREASE ITS CAPACITY FROM 75 TO 120** 23 - 74
8. **PROPOSAL TO REVIEW PRIMARY EDUCATION PROVISION IN THE MYNYDDYGARREG AND GWENLLIAN AREAS** 75 - 126
9. **PROPOSAL TO CHANGE THE AGE RANGE OF SWISS VALLEY PRIMARY SCHOOL FROM 4-11 TO 3-11** 127 - 164
10. **PROPOSAL TO REVIEW PRIMARY EDUCATION PROVISION IN THE BLAENAU AND LLANDYBIE AREAS** 165 - 224
11. **PROPOSAL TO RECONFIGURE AND REMODEL BEHAVIOUR SUPPORT SERVICES AT YSGOL RHYDYGORS TO IMPROVE PROVISION FOR CHILDREN AND YOUNG PEOPLE** 225 - 262
12. **REVISED CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN 2018 -2033 REPRESENTATIONS RECEIVED AND FOCUSED CHANGES** 263 - 1394
13. **REGIONAL TECHNICAL STATEMENT FOR AGGREGATES - SOUTH WALES - SECOND REVIEW (RTS2)** 1395 - 1562

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|---|--------------------|
| <b>14. INTERIM REPORT - EQUALITY AND DIVERSITY TASK &amp; FINISH GROUP (BLACK, ASIAN AND MINORITY ETHNIC)</b>   | <b>1563 - 1580</b> |
| <b>15. COUNCIL TAX BASE 2021-22</b>   | <b>1581 - 1610</b> |
| <b>16. ANY OTHER ITEMS OF BUSINESS THAT BY REASONS OF SPECIAL CIRCUMSTANCES THE CHAIR DECIDES SHOULD BE CONSIDERED AS A MATTER OF URGENCY PURSUANT TO SECTION 100B(4)(B) OF THE LOCAL GOVERNMENT ACT, 1972.</b> |                    |

## EXECUTIVE BOARD

Monday, 30 November 2020

**PRESENT:** Councillor E. Dole (Chair)

**Councillors:**

C.A. Campbell, G. Davies, H.A.L. Evans, L.D. Evans, P.M. Hughes, P. Hughes-Griffiths, D.M. Jenkins, L.M. Stephens and J. Tremlett

**Also in attendance:**

Councillor D.M. Cundy

**The following Officers were in attendance:**

W. Walters, Chief Executive

C. Moore, Director of Corporate Services

J. Morgan, Director of Community Services

G. Morgans, Director of Education & Children's Services

R. Mullen, Director of Environment

J. Jones, Head of Regeneration

L.R. Jones, Head of Administration and Law

P.R. Thomas, Assistant Chief Executive (People Management & Performance)

I.R. Llewelyn, Forward Planning Manager

L Morris, Senior Press Officer

M. Evans Thomas, Principal Democratic Services Officer

M.S. Davies, Democratic Services Officer

R. Lloyd, Democratic Services Officer

J. Corner, Technical Officer

L. Jenkins, Executive Board Support Officer

S. Rees, Simultaneous Translator

E. Bryer, Democratic Services Officer

**Virtual Meeting - 10.00 am - 11.30 am**

**1. APOLOGIES FOR ABSENCE.**

There were no apologies for absence.

**2. DECLARATIONS OF PERSONAL INTEREST.**

Councillor / Officer	Minute No (s)	Nature of Interest
Cllr. Emlyn Dole	13 - Arfor Innovation Fund	Cllr. A. Vaughan Owen (applicant) is a member of the same political party.
Cllr. Glynog Davies	15 - Targeted Regeneration Investment (TRI) Programme 2018-2021	He is a Director of a company based in Llanelli town.

Jake Morgan	9 - Variation of The Regional Consortia's Legal Agreement (ERW)	His wife works for ERW.
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**3. TO SIGN AS A CORRECT RECORD THE MINUTES OF THE MEETING OF THE EXECUTIVE BOARD HELD ON THE 16TH NOVEMBER, 2020**

**UNANIMOUSLY RESOLVED** that the minutes of the meeting of the Executive Board held on the 16th November, 2020 be signed as a correct record.

**4. QUESTIONS ON NOTICE BY MEMBERS**

The Chair advised that no questions on notice had been submitted by members.

**5. PUBLIC QUESTIONS ON NOTICE**

The Chair advised that no public questions had been received.

**6. REVENUE BUDGET OUTLOOK 2021/22 TO 2023/24**

The Executive Board considered the revenue budget outlook report which provided the current financial outlook and updated financial model for the next three financial years. The report outlined the proposals for taking forward the budget preparation for the three-year period.

It was noted that, although the Authority had received a £14m increase in its Welsh Government settlement, a council tax increase of 4.89% and budget reductions totalling £5.1m was required to balance the budget.

The Executive Board was advised that Welsh Government would not be confirming the provisional settlement data until the 22nd December. Consultations would commence in January however due to the late settlement the budget timetable would be compressed even more than usual.

**UNANIMOUSLY RESOLVED to:**

- 6.1 Receive the initial budget outlook and consider the level of Council Tax rises and the level of school efficiencies that it considers appropriate for developing the Medium Term Financial Plan;**
- 6.2 Endorse the proposed approach to identifying the required savings;**
- 6.3 Note the proposed approach to the budget consultation.**

**7. OMBUDSMAN'S ANNUAL LETTER 2019/20**

The Board considered the Public Services Ombudsman for Wales' Annual Letter for 2019/20. The letter was accompanied by a factsheet with accompanying data, which assists the Authority in reviewing performance.

It was noted that there had been a decrease of 2.4% in complaints received by the PSOW relating to local authorities nationally and the number of complaints received by the Ombudsman concerning Carmarthenshire had fallen in the past year from 49 to 42. It was noted that most of the date related to the period prior to the escalation of Covid.

**UNANIMOUSLY RESOLVED that the Public Services Ombudsman for Wales' Annual Letter for 2019-20 be received.**

**8. MID-YEAR TREASURY MANAGEMENT AND PRUDENTIAL INDICATOR REPORT 1ST APRIL 2020 TO 30TH SEPTEMBER 2020**

The Executive Board considered an update report on the treasury management activities and the prudential indicators for the period 1st April 2020 to 30th September 2020.

**UNANIMOUSLY RESOLVED TO RECOMMEND TO COUNCIL that the Mid-Year Treasury Management and Prudential Indicator Report for 1st April 2020 to 30th September 2020 be adopted.**

**9. VARIATION OF THE REGIONAL CONSORTIA'S LEGAL AGREEMENT (ERW)**

[**Note:** Jake Morgan having earlier declared an interest in this item, left the meeting]

The Board considered the report detailing the Variation of the Legal Agreement to enable interim services to be provided to Neath Port Talbot schools, remaining Authorities withdrawal and for dissolution of ERW.

It was noted that Neath Port Talbot had left ERW on the 31<sup>st</sup> March, 2020; Ceredigion and Swansea Council had also given notice. Powys and Pembrokeshire County Council had yet to give notice. Carmarthenshire County Council were due to leave ERW at the end of the financial year.

The current proposal was that ERW should be dissolved at the end of the 2020/21 financial year but the timeline could change depending on the agreements reached. The alternative implementation date suggested was the 31st August, 2021.

The Board acknowledged that the current ERW model had been deficient and asked that the transition to the new model would take place as soon as possible and also reflect Carmarthenshire's bilingual learning vision.

**UNANIMOUSLY RESOLVED to:**

- 9.1 agree changes to the ERW Legal Agreement to facilitate provision of agreed services to Neath Port Talbot schools during 2020/21 as set out in the report.**
- 9.2 agree changes are made to the Legal Agreement as set out in the report.**
- 9.3 delegate authority to the Chief Legal Officer and Director of Education to make any necessary changes to the Legal Agreement (in consultation with the other ERW partners) and to enter into any documentation necessary to implement any of the recommendations in the report and to protect the Council's interests.**

## 10. LOCAL DEVELOPMENT ORDER - CROSS HANDS EAST

The Executive Board considered a report regarding the potential for a Local Development Order to be made within Cross Hands East.

The report detailed that Cross Hands East Strategic Employment Site is a regionally significant employment location in Carmarthenshire and an important part of the Cross Hands Growth Zone. Providing 19 acres of developable land, development of this scale would create in the region of 1,000 new jobs. Demand for industrial and business space in Cross Hands and the County is high with occupancy rates in the Council's Industrial portfolio consistently over 90%.

It was noted that a LDO provided a Local Planning Authority with an opportunity to streamline the planning process by removing the need for developers/applicants to make a planning application to the Authority and for development proposals to be submitted as an LDO application, allowing an authority to act proactively in response to locally specific circumstances within its geographical area.

**UNANIMOUSLY RESOLVED that the proposed Local Development Order be considered through the democratic reporting process.**

## 11. ANY OTHER ITEMS OF BUSINESS THAT BY REASONS OF SPECIAL CIRCUMSTANCES THE CHAIR DECIDES SHOULD BE CONSIDERED AS A MATTER OF URGENCY PURSUANT TO SECTION 100B(4)(B) OF THE LOCAL GOVERNMENT ACT, 1972.

The Chair advised that there were no items of urgent business.

## 12. EXCLUSION OF THE PUBLIC

**UNANIMOUSLY RESOLVED, pursuant to the Local Government Act 1972, as amended by the Local Government (Access to Information) (Variation) (Wales) Order 2007, that the public be excluded from the meeting during consideration of the following items as the reports contained exempt information as defined in paragraph 14 of Part 4 of Schedule 12A to the Act.**

## 13. ARFOR INNOVATION FUND

[**Note:** The Leader left the meeting for this item and the Deputy Leader assumed the Chair. The item was considered as the final agenda item].

**Following the application of the public interest test it was RESOLVED pursuant to the Act referred to in minute no. 12 above not to publicise the content of the report as it contained exempt information relating to the financial or business affairs of any particular person (including the Authority holding that information) (Paragraph 14 of Part 4 of Schedule 12A to the Act).**

**The public interest test in this matter related to the fact that the report contained detailed information about the business and financial affairs and ambitions of the applicants. In this case, the public interest in maintaining the above exemption under the 1972 Act in respect of this report outweighs**



**the public interest in disclosing the information contained therein, as disclosure would likely place the person and business name in the report at an unfair disadvantage in relation to their commercial competitors.**

The Executive Board considered an application for assistance from the Arfor Innovation Fund. The priority of the fund was to support business growth in areas with a high proportion of Welsh speakers and to generate more and better paid jobs to retain local people in those areas.

This application, which would normally have been determined at an Executive Board Decisions Meeting for the Leader had been referred to the Executive Board as the application had been submitted by a company owned by Councillor Aled Vaughan Owen who was also a fellow member of the Plaid Cymru Group. Cllr. Dole had referred it to the Executive Board for determination although he had no specific interest in the matter.

**UNANAMOUSLY RESOLVED that the application for assistance from the Arfor Innovation Fund by Ynni Da for the sum of £1,535.04 be approved, subject to the usual terms and conditions and those specified in the report.**

#### **14. CROSS HANDS REGENERATION INITIATIVES**

**Following the application of the public interest test it was RESOLVED pursuant to the Act referred to in minute no. 12 above not to publicise the content of the report as it contained exempt information relating to the financial or business affairs of any particular person (including the Authority holding that information) (Paragraph 14 of Part 4 of Schedule 12A to the Act).**

**The public interest test in respect of this report outweighed the public interest as disclosing the contents of the report would weaken the position of the authority in any subsequent tender exercise and potentially result in greater cost to public finances than would otherwise be the case.**

The Executive Board considered a report providing an update on the ongoing regeneration initiatives at Cross Hands including the endorsement of the extension to the existing Joint Venture agreement (between Carmarthenshire County council and Welsh Government) to 31<sup>st</sup> March, 2024. Also the endorsement of development and delivery of a self-build mixed use employment development on Cross Hands East Employment Site Plot 3.

For accuracy it was noted that the within the consultation section of the report, it should read that Cllr. A. Vaughan-Owen had been consulted and not Cllr. A. Scourfield.

**UNANIMOUSLY RESOLVED to:**

- 14.1 Extend the agreement to the existing Cross Hands Joint Venture (CHJV) Agreement to 31<sup>st</sup> March 2024 (2 years from March 2022).**
- 14.2 Grant delegate authority to the Head of Regeneration in consultation with Executive Board Member, to progress the delivery of the Plot 3 project through each stage of development / implementation through to completion as detailed in the report. Including authority to proceed**

with the project with or without the involvement of ABC (Active Building Centre), subject to the ongoing legal discussions with ABC and their legal representatives.

- 14.3 Grant delegated authority to the Head of Regeneration, in consultation with the Head of Legal Services, to undertake disposals of plots within the CHJV in accordance with the disposal strategy and in agreement with Welsh Government as joint venture partner.

**15. TARGETED REGENERATION INVESTMENT (TRI) PROGRAMME 2018-2021**

[Note: Cllr. Glynog Davies having earlier declared an interest in this item left the meeting during discussions regarding Llanelli town centre / Crown Buildings]

Following the application of the public interest test it was **RESOLVED** pursuant to the Act referred to in minute no. 12 above not to publicise the content of the report as it contained exempt information relating to the financial or business affairs of any particular person (including the Authority holding that information) (Paragraph 14 of Part 4 of Schedule 12A to the Act).

The Executive Board considered a report noting the current position and progress on the Targeted Regeneration Investment Programme (TRI) programme.

**UNANIMOUSLY RESOLVED to:**

- 15.1 Support the proposals for the Regional Delivery of the Targeted Regeneration Investment Programme (TRI) year 4 projects (2021 – 2022).
- 15.2 Approve that the project team progress the applications with third party applicants on the Crown Building and Y Linc projects.

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CHAIR

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DATE

## EXECUTIVE BOARD

Monday, 23 November 2020

**PRESENT:** Councillor E. Dole (Chair);

**Councillors:**

C.A. Campbell, G. Davies, H.A.L. Evans, L.D. Evans, P.M. Hughes, P. Hughes-Griffiths, D.M. Jenkins, L.M. Stephens and J. Tremlett;

**Also in attendance:**

Councillor D.M. Cundy;

**The following Officers were in attendance:**

W. Walters, Chief Executive;

J. Morgan, Director of Community Services;

R. Mullen, Director of Environment;

G. Morgans, Director of Education & Children's Services;

R. Hemingway, Head of Financial Services;

S. Pilliner, Head of Transportation & Highways;

L.R. Jones, Head of Administration and Law;

P.R. Thomas, Assistant Chief Executive (People Management & Performance);

D. Hockenhuil, Marketing and Media Manager;

G. Morgan, Democratic Services Manager;

J. Corner, Technical Officer;

S. Rees, Simultaneous Translator;

J. Owen, Democratic Services Officer;

K. Thomas, Democratic Services Officer;

M.S. Davies, Democratic Services Officer.

**Virtual Meeting: 4.00 pm - 4.30 pm**

**1. APOLOGIES FOR ABSENCE**

There were no apologies for absence.

**2. DECLARATIONS OF PERSONAL INTEREST**

There were no declarations of personal interests.

**3. QUESTIONS ON NOTICE BY MEMBERS**

The Chair advised that no questions on notice had been submitted by members.

**4. PUBLIC QUESTIONS ON NOTICE**

The Chair advised that no public questions had been received.

**5. EXTENDING FREE PARKING DAYS INTO DECEMBER 2020**

The Executive Board considered a report on proposals to permit free parking days to be taken in the month of December in 2020 as an exception to support the economic recovery of towns during the Covid-19 pandemic.

The Council's current policy provided for five free parking days each year to support town centres but excluded the trading period of December. Some town

centres had approached the Council to request that December be included in the offer this year due to the exceptional circumstances caused by the COVID19 pandemic. The Council had supported town centres with free parking from March to September this year and with the continuation of the free parking pilots in place at each town. The latest request would help provide further support at this difficult time.

**UNANIMOUSLY RESOLVED to approve the extension of free parking in December during 2020 only.**

**6. URGENT ITEM - TEMPORARY EMERGENCY PAYMENT FOR CARE STAFF (TO SUPPORT STAFFING IN PRIVATE CARE HOMES)**

The Chair advised that pursuant to Section 100B (4)(b) of the Local Government Act 1972 he had decided to allow this item to be considered at the meeting as a matter of urgency as action was required to be taken prior to the next meeting of the Board. The report had been included on an amended Agenda published prior to the meeting.

Accordingly, the Executive Board considered a report seeking authority to implement a temporary emergency payment arrangement to support private care homes which were facing short notice staffing shortages as a result of the COVID 19 pandemic. This emergency payment would only be applicable where there were specific instances where the staffing complement of Private Care homes was compromised due to the statutory self-isolation and Covid19 Positive results of the private care home staff, where there is insufficient cover to deliver care. It was clarified that the Executive Board Member portfolios had been inadvertently inserted next to the wrong Executive Board Member and that the reference in the report to 'ICF capital' should read 'ICF revenue'.

It was noted that there would be no additional cost to the Authority, as these would be fully reclaimed from the relevant Private Care home that required support. Members welcomed the report and again paid tribute to all care home staff.

**UNANIMOUSLY RESOLVED to approve the temporary emergency payment arrangement for care staff to support private care homes facing short notice staffing shortages as a result of the COVID 19 pandemic.**

**7. ANY OTHER ITEMS OF BUSINESS THAT BY REASONS OF SPECIAL CIRCUMSTANCES THE CHAIR DECIDES SHOULD BE CONSIDERED AS A MATTER OF URGENCY PURSUANT TO SECTION 100B(4)(B) OF THE LOCAL GOVERNMENT ACT, 1972**

The Chair advised that there were no items of urgent business.

\_\_\_\_\_  
CHAIR

\_\_\_\_\_  
DATE

**EXECUTIVE BOARD**  
**21<sup>ST</sup> DECEMBER 2020**

**MODERNISING EDUCATION PROGRAMME**

**PROPOSAL TO SHORTEN THE INTERNAL SCHOOL ORGANISATION DECISION MAKING AND DETERMINATION PROCESS**

**Recommendations / key decisions required:**

It is recommended that the Executive Board:  
Considers and approves the proposal as outlined in the report.

**Reasons:**

In order to be able to continue to progress with school re-organisation proposals in an effective and timely manner following the delays caused by the Covid-19 pandemic.

**Relevant Scrutiny Committee Consulted:** Yes – 23/11/2020

The Education and Children’s Scrutiny committee UNANIMOUSLY RESOLVED

- That the proposal to shorten the internal school organisation decision making and determination process be endorsed
- To recommend that the Executive Board progress with the amended process for progressing statutory proposals and consultation as detailed in the report i.e. the removal of consultation with the Education & Children Scrutiny Committee at Stages 2 and 3.

**Executive Board Decision Required** Yes – 21/12/2020

**Council Decision Required** Yes – 13/01/2021

**Executive Board Member Portfolio Holder:** Cllr. Glynog Davies (Education & Children)

**Directorate:**  
Education & Children

**Name of Head of Service:**  
Simon Davies

**Report Author:**  
Sara Griffiths

**Designations:**

Head of Access to Education

Modernisation Team Manager

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# EXECUTIVE SUMMARY

EXECUTIVE BOARD  
21<sup>ST</sup> DECEMBER 2020

## MODERNISING EDUCATION PROGRAMME

### PROPOSAL TO SHORTEN THE INTERNAL SCHOOL ORGANISATION DECISION MAKING AND DETERMINATION PROCESS

#### Background Information

##### **School Organisation Code 2013**

The School Standards and Organisation (Wales) Act 2013 and School Organisation Code 2013 came into effect as of the 1<sup>st</sup> October 2013 and significantly changed responsibilities for the determination of school organisation proposals. The Act provided all Local Authorities with greater decision making powers and allowed Local Authorities to determine all school organisation proposals with the exception of those which affect sixth form education; or those that have been made by a proposer other than the relevant local authority and an objection has been made by that local authority.

In 2015, following the publication of the School Organisation Code 2013, Carmarthenshire County Council approved a new “School Organisation Decision Making and Determination Process” which reduced the timescale to complete and approve statutory proposals in relation to school re-organisation. This process allowed the Executive Board to approve Stage 1 (Permission to Consult) and Stage 2 (Permission to Notice) with County Council approving Stage 3 (Permission to Implement).

##### **School Organisation Code 2018**

On 30<sup>th</sup> June 2017, following three years of operation, Welsh Government published a consultation on a review of the School Organisation Code. The consultation was based on the reflection of feedback and learning during the period and stakeholders were asked to submit their responses by 30<sup>th</sup> September 2017.

The most substantial change proposed, was to strengthen the Code in respect of a presumption against closure of rural schools. The “Consultation – summary of response” published on 2<sup>nd</sup> July 2018 noted that *“when considering whether closure is appropriate the current Code states that special attention should be given to alternatives to closure and when consulting on proposals the consultation document must contain a description of any alternatives and the reasons why they have been discounted. We believe that considering all the possible alternatives should be a two-stage process. The proposer should do this before they even reach a decision to consult on a proposal to close, and should also consider any further options or suggestions that emerge during the consultation process. The aim is to ensure that the decision to propose and consult on a closure of a rural school is taken only after all alternatives to closure have been considered, including federation.”*

In light of the expected publication of the new School Organisation Code, Carmarthenshire County Council had to ensure that its process for proceeding with and approving statutory procedures fell in line and adhered to the necessary requirements. As a result, the Local Authority amended its “School Organisation Decision Making and Determination Process” to include Stage 0 and this was approved by the Executive Board Member for Education and Children in September 2018. It is believed that the inclusion of Stage 0 will result in a more open and transparent system, as required by Welsh Government and will demonstrate that the Local Authority has considered all possible options for the schools under review without presuming closure. (The full process can be seen in the attached flow chart).

The new School Organisation Code, which includes the presumption against closure of rural schools, was published in November 2018.

### **COVID – 19 Pandemic**

Prior to the Covid-19 pandemic, the Modernising Education Programme team were about to undertake the following:

- Full scale review of the Modernising Education Programme;
- Identify suitable MIM (Mutual Investment Team) projects as part of the review;
- Progress with a number of statutory school re-organisation proposals and federations.

As a result of the pandemic, all members of the MEP team were fully redeployed (for a period of around 4 months) to other critical areas within the Education Department and as such were only able to complete very limited amounts of project work. Prior to the pandemic, the team had planned to undertake around 6 statutory consultations (in relation to school reorganisation or federation matters) with imminent commencement, all of which have had to be postponed with rescheduled dates to be confirmed. This is without including any statutory school re-organisations that would have been brought forward as a result of the conclusion of the MEP review. Whilst the team were redeployed for a period of around 4 months, the realistic delay to school re-organisation proposals has been around 6 months due to the need for establishing new timelines for each proposal and updating all documentation with the most recent data sets.

With regards to Carmarthenshire County Council’s investment programme, all projects with contractors on site at the time of initial lockdown were shut down and closed, with re-commencement dates continually being approved to allow works to continue. As a result, it is expected that the pandemic will have significant impact on the MEP programme in terms of funding and timelines.

### **Moving Forward**

The MEP team are now in the process of undertaking all of the work planned prior to the pandemic and are working on developing the MEP Review and developing new timescales for the postponed statutory consultations. It is hoped that all relevant project related matters can still be undertaken within a timescale as close to the original as possible, however it is expected that there will be some delay to determination and implementation.

As such, and in order to be able to progress with any school re-organisation proposals (that could be linked to investment projects), consideration has been given to reducing the Internal School Organisation Decision Making and Determination Process once more. Whilst it is accepted that reducing the process will not wholly alleviate the delays incurred due to the Covid-19 pandemic, it will go some way in helping the MEP team to re-prioritise required consultations in an effective and timely manner.

As can be seen from the Illustrative Flow Chart (Current Version), consultation is required with the ECS Scrutiny Committee and the Executive Board at Stages 1 and 2 with the addition of full County Council at Stage 3 to determine the proposal.

**Proposal**

As can be seen from the Illustrative Flow Chart (Proposed Version), it is proposed to:

- Remove consultation with the ECS Scrutiny Committee from Stages 2 and 3.

This is due to the Executive Board being able to approve Stage 2 and County Council being able to approve Stage 3. This would reduce the process by approximately 2 months. Consultation will then progress as follows:

- Stage 1 – ECS Scrutiny Committee and Executive Board
- Stage 2 – Executive Board
- Stage 3 – Executive Board and County Council

The proposal still ensures that the ECS Scrutiny Committee can formally consider the proposal before any public consultation is agreed and also allows members of the ECS Scrutiny Committee to determine the outcome of the proposal as members of the full County Council. They will also be consulted with during the formal 6 week consultation period (if permission to consult is granted by the Executive Board).

**Recommendation**

It is recommended that the Executive Board considers and approves the amended process for progressing statutory proposals and consultations as detailed in the attached illustrative flow chart (the removal of consultation with the ECS Scrutiny Committee at Stages 2 and 3).

<b>DETAILED REPORT ATTACHED?</b>	Yes – Illustrative Flow Chart (Current Version) Illustrative Flow Chart (Proposed Version)
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# IMPLICATIONS

I confirm that other than those implications which have been agreed with the appropriate Directors / Heads of Service and are referred to in detail below, there are no other implications associated with this report.

Signed:



Head of Access to Education

Policy, Crime & Disorder and Equalities	Legal	Finance	ICT	Risk Management Issues	Staffing Implications	Physical Assets
YES	YES	YES	NONE	YES	YES	NONE

## 1. Policy, Crime & Disorder and Equalities

Developments are consistent with the Authority's Corporate Strategy and the Modernising Education Strategic Outline Programme.

## 2. Legal

For all school re-organisation proposals, appropriate consultation will need to be initiated in accordance with the relevant statutory procedures and School Organisation Code 2018, regardless of the outcome of the determination of this proposal. Approval of the proposal to shorten the process for approving statutory proposals / consultations will ensure that team can maximise opportunities to engage in consultations following the Covid-19 pandemic.

## 3. Finance

School delegated budgets are in a net deficit and the current number of schools within the LA is a significant contributory factor. The majority of schools that will be taken through the statutory process are in deficit and therefore timescales are paramount in progressing the necessary changes. The Department budget includes many services providing support to schools and so the main budget efficiency proposals reply on a reduced number of primary schools in order to operate on a more efficient basis in a timely manner. There are also implications for the capital programme (and therefore WG funding) if schemes are delayed.

## 5. Risk Management Issues

Should the proposal to shorten the internal democratic process for approving statutory proposals / consultations be declined, there is a potential risk that officers will not be able to complete the relevant school organisation consultations (which could be linked with other investment projects) within the relevant timescales as governed by the School Organisation Code. Failure to complete school organisation proposals within appropriate timescales could not only result in delays with the construction development of projects but could also result in financial delays with grant claims etc. For schools, that are not subject to capital investment there are other risks that should be considered such as: premises maintenance costs, staffing and budgetary pressures which will have been accounted for within the overall proposal.

## 6. Staffing Implications

During the Covid-19 pandemic the whole of the Modernising Education Programme team were re-deployed for 4 months to other critical areas within the Department for Education. As a result of this, the team were unable to progress with any project / school re-organisation work during this time, which has inevitably caused delays with workloads. Shortening the internal democratic process for approving statutory proposals / consultations will ensure that staff can continue to prioritise and complete workloads within the appropriate timeframes as governed by the School Organisation Code etc.

# CONSULTATIONS

I confirm that the appropriate consultations have taken in place and the outcomes are as detailed below:

Signed:



Head of Access to Education

**1. Scrutiny Committee –** Were consulted on 23/11/2020.

The Education and Children’s Scrutiny committee UNANIMOUSLY RESOLVED

- That the proposal to shorten the internal school organisation decision making and determination process be endorsed
- To recommend that the Executive Board progress with the amended process for progressing statutory proposals and consultation as detailed in the report i.e. the removal of consultation with the Education & Children Scrutiny Committee at Stages 2 and 3.

**2. Local Member(s) –** Not applicable

**3. Community / Town Council –** Not applicable

**4. Relevant Partners –** Not applicable

**5. Staff Side Representatives and other Organisations –** Not applicable

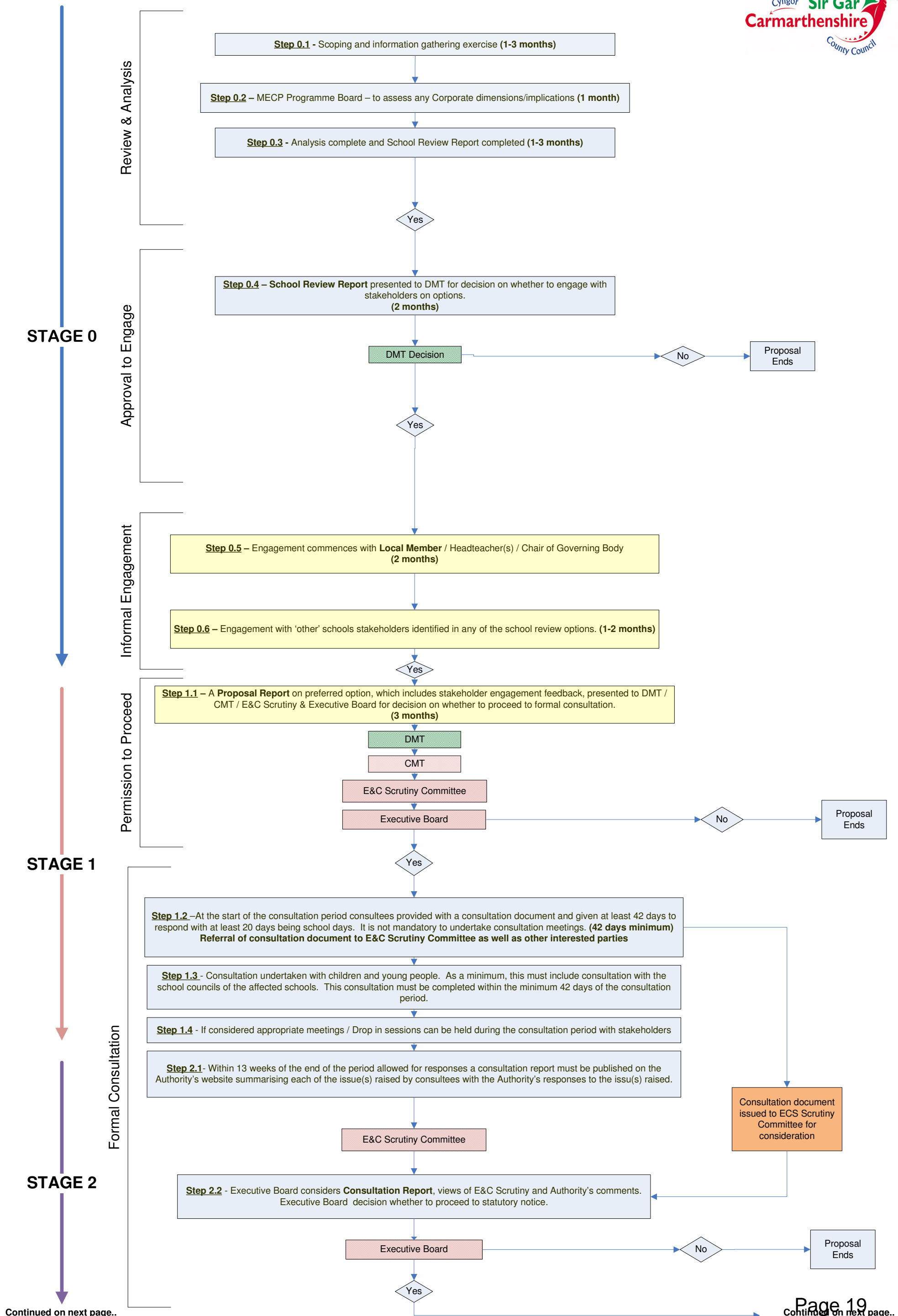
**EXECUTIVE BOARD PORTFOLIO HOLDER AWARE/CONSULTED**

Yes

**Section 100D Local Government Act, 1972 – Access to Information  
List of Background Papers used in the preparation of this report:**

Title of Document	File Ref No. / Locations that the papers are available for public inspection
ECS Scrutiny Report	<a href="https://democracy.carmarthenshire.gov.wales/documents/s45464/Summary.pdf">https://democracy.carmarthenshire.gov.wales/documents/s45464/Summary.pdf</a>
School Organisation Code 2018	<a href="https://gov.wales/sites/default/files/publications/2018-10/school-organisation-code-second-edition.pdf">https://gov.wales/sites/default/files/publications/2018-10/school-organisation-code-second-edition.pdf</a>
School Organisation Decision Making and Determination Process (Inclusion of Stage 0 in 2018) – Executive Board Member Report	<a href="https://democracy.carmarthenshire.gov.wales/documents/s24828/Summary.pdf">https://democracy.carmarthenshire.gov.wales/documents/s24828/Summary.pdf</a>
School Organisation Decision Making and Determination Process (Reduction in Length of Process in 2015) – County Council Report	<a href="https://democracy.carmarthenshire.gov.wales/documents/s790/MEP%20cover%20and%20exec%20summary.pdf">https://democracy.carmarthenshire.gov.wales/documents/s790/MEP%20cover%20and%20exec%20summary.pdf</a>
School Organisation Code 2013	<a href="https://gov.wales/sites/default/files/publications/2018-03/school-organisation-code.pdf">https://gov.wales/sites/default/files/publications/2018-03/school-organisation-code.pdf</a>
21 <sup>st</sup> Century Schools Website	<a href="http://www.21stcenturyschools.org">www.21stcenturyschools.org</a>

Department for Education & Children Modernising Education Programme  
Illustrative Flow Chart for Strategic Review and Statutory Proposals



Continued from page 1..

STAGE 2

Statutory Procedure

**Step 2.3** - Proposals published on Authority website and posted in the named and neighbouring schools and within the locality giving opportunity for statutory objections. One month period provided for written response period. **(28 days)**

**Step 2.4** - If objections received an objection report must be published providing a summary of the objections and the Authority's responses to them.

E&C Scrutiny Committee

**Step 3.1** - Executive Board considers objection report, views of E&C Scrutiny Committee and Authority's comments. Executive Board recommendation to County Council for decision whether to approve proposal.

Executive Board

**Step 3.2** - An **Objection Report** presented to County Council to consider any objections received in writing or e-mail and Authority's responses. County Council makes decision to proceed or withdraw proposals.

County Council decision

No

Proposal Ends

Yes

STAGE 3

Implementation

**Step 3.3a** - If the proposal requires determination by the Welsh Ministers (Sixth form education), the proposer must send to the Welsh Ministers within 35 days of the end of the objection period. The Welsh Ministers will normally determine proposals within 16 weeks of the end of the objection period.  
  
**When a proposal affects 6<sup>th</sup> form education it is referred to Welsh Ministers regardless of any objections being received.**

**Step 3.3b** - The local authority **must** issue a decision within 16 weeks of the end of the objection period. Within 28 days of the local authority's determination proposals may be referred to Welsh Ministers by the following:  
  
1. Another local authority  
2. The appropriate religious body for any school affected (the diocesan authority)  
3. The governing body of a voluntary or foundation school  
4. A trust holding property on behalf of a voluntary or foundation school  
5. A further education institution affected by the proposals.

Yes

Referral to Welsh Ministers for decision

No

Proposal Ends

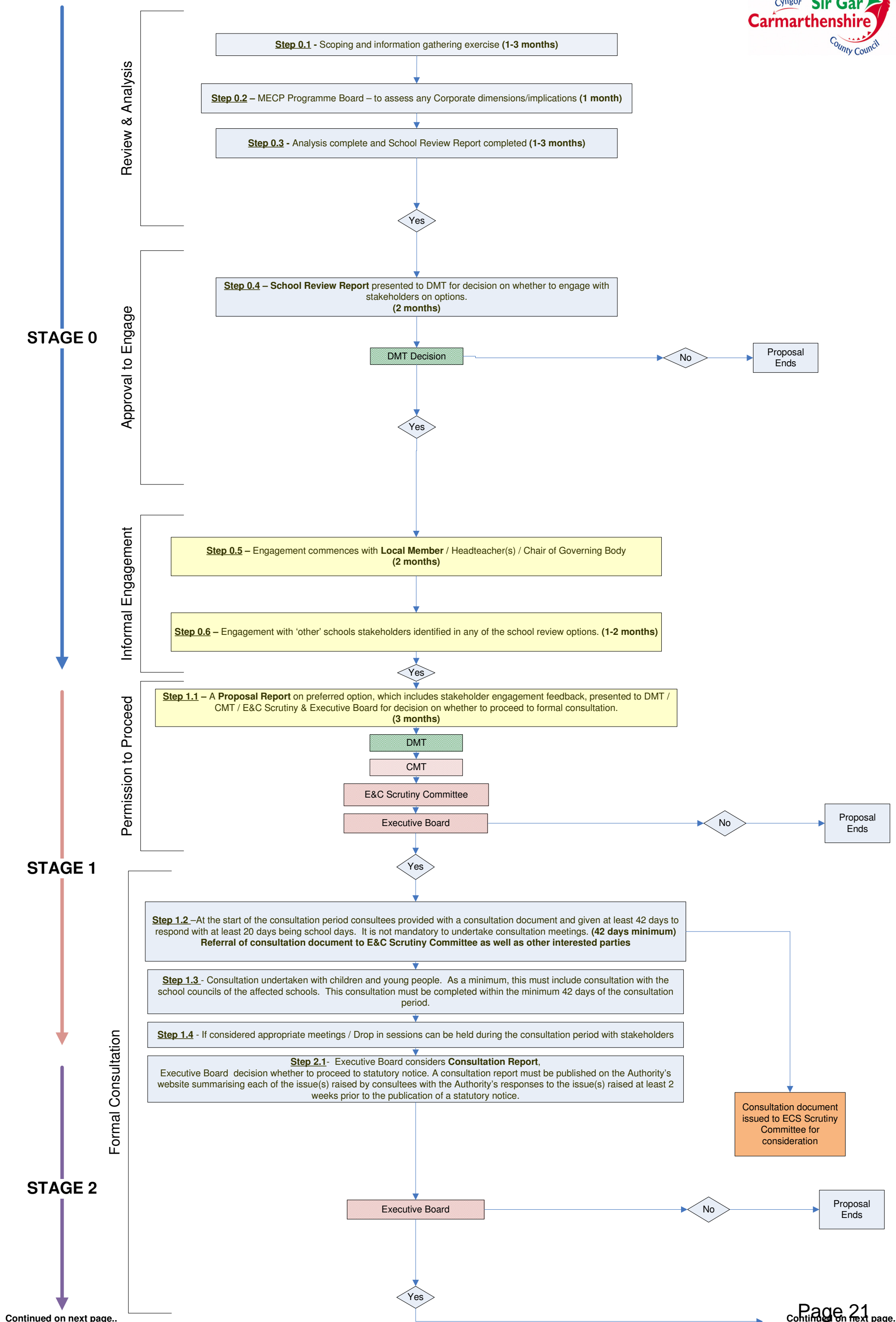
Yes

**Step 3.4** - Decisions must be published electronically on the website and all stakeholders must be advised by letter or e-mail of the availability of the decision including the **objection report**. Decision letter must be published within 7 days of determination date.

**Step 3.5 - Not mandatory** - Parents/Guardians are notified of LA/Ministers decision one term before proposal can be implemented. (e.g. For a proposal to be implemented from the start of the Autumn term notification must be given before the end of the previous Spring term)

**Step 3.6** - LA Implements Proposal in accordance with the date given in the statutory notice, or any subsequent modified date, usually at the start of the academic year in September

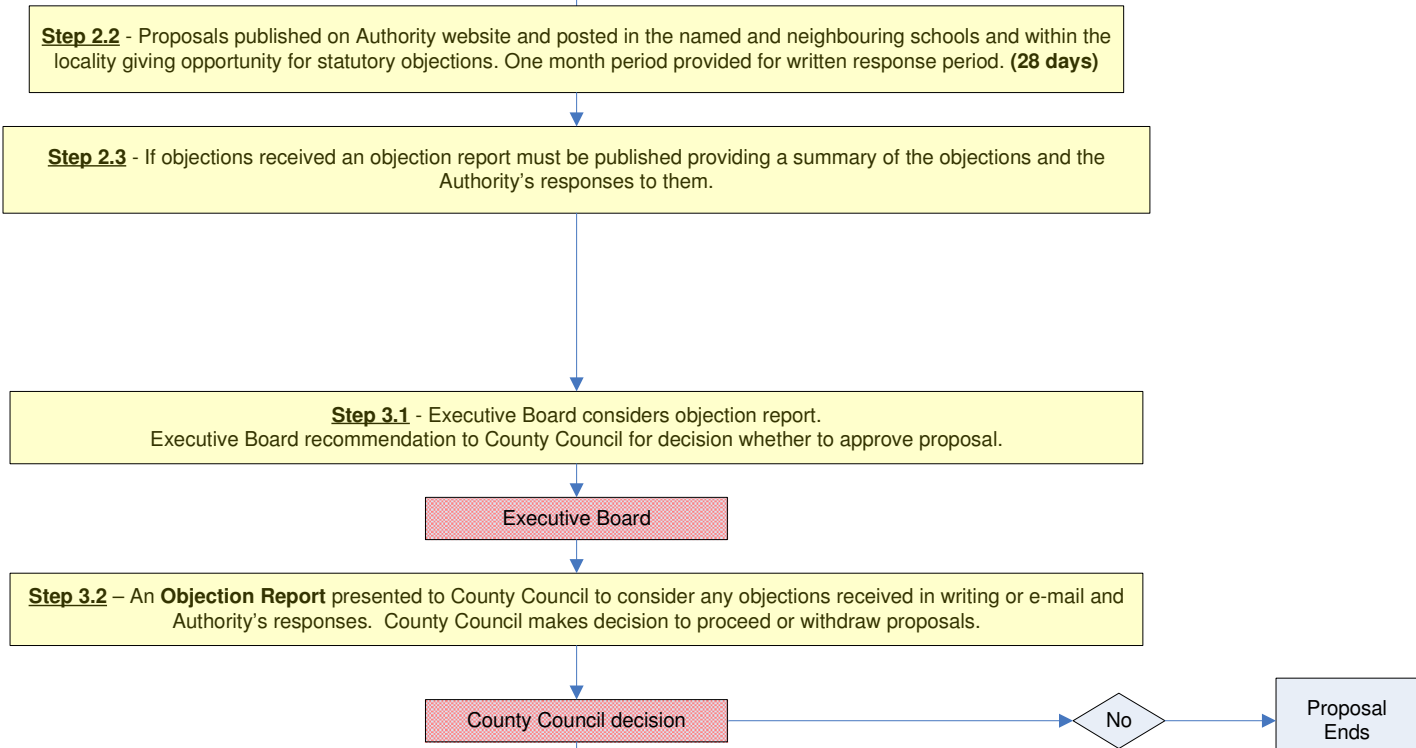
Department for Education & Children Modernising Education Programme  
Illustrative Flow Chart for Strategic Review and Statutory Proposals



Continued from page 1..

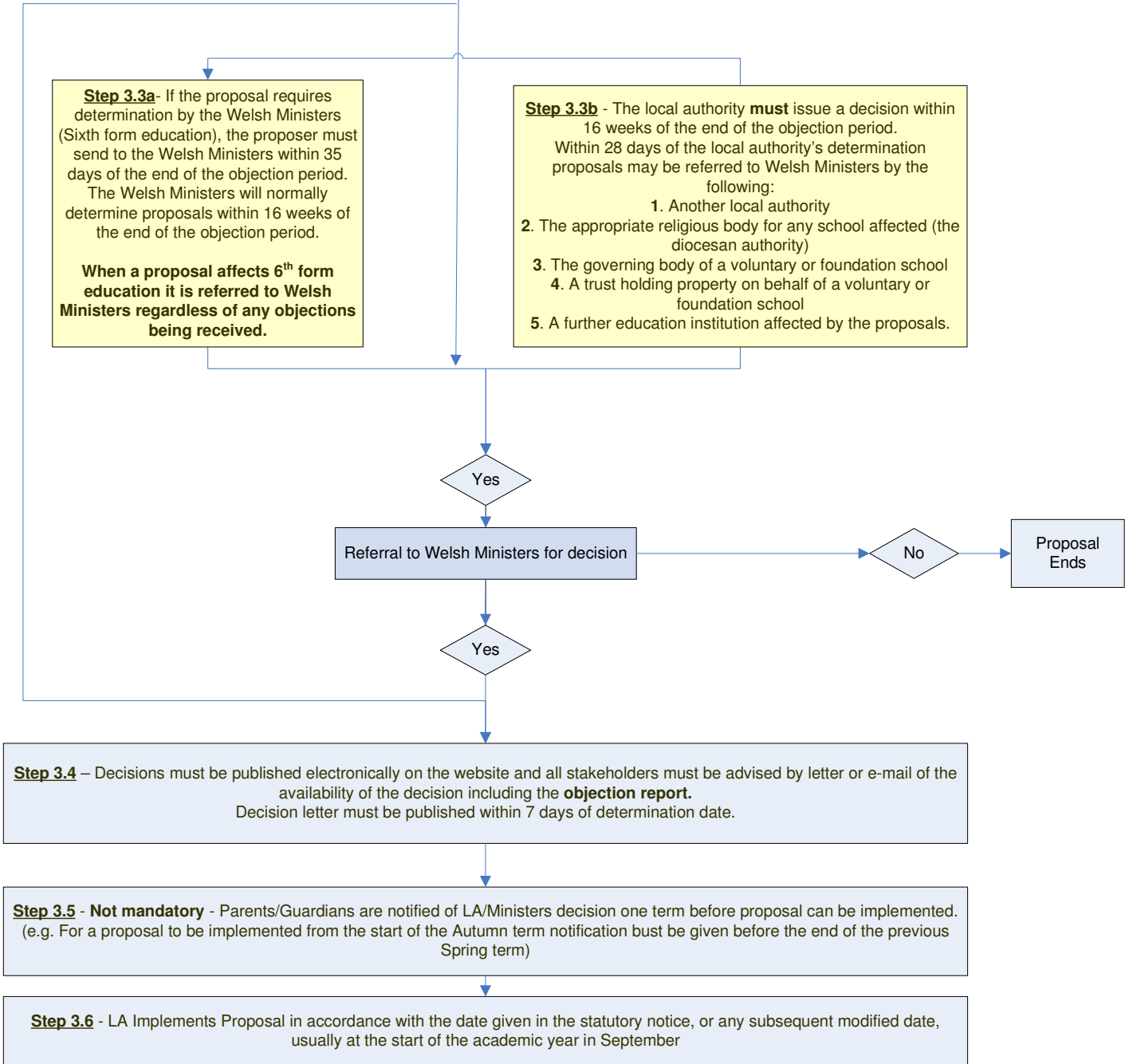
STAGE 2

Statutory Procedure



STAGE 3

Implementation



## EXECUTIVE BOARD

21<sup>ST</sup> DECEMBER 2020

### MODERNISING EDUCATION PROGRAMME

#### PROPOSAL TO RELOCATE YSGOL HEOL GOFFA TO A NEW SITE AND INCREASE ITS CAPACITY FROM 75 TO 120

##### Recommendations / key decisions required:

It is recommended that the Executive Board approves:

1. The observations received and the Local Authority's responses following the consultation period (Consultation Report attached);
2. The publication of a statutory notice to implement the proposal.

##### Reasons:

To comply with statutory procedures and guidance in relation to school re-organisation.

##### Relevant Scrutiny Committee Consulted: Yes – 23/11/20

The Education & Children Scrutiny Committee unanimously resolved:

- That the report be endorsed;
- To recommend to the Executive Board the publication of a Statutory Notice.

**Executive Board Decision Required : YES 21/12/20**

**Council Decision Required NO**

**Executive Board Member Portfolio Holder:** Cllr. Glynog Davies (Education & Children)

<p><b>Directorate:</b> Education &amp; Children</p> <p><b>Name of Head of Service:</b> Simon Davies</p> <p><b>Report Author:</b> Sara Griffiths</p>	<p><b>Designations:</b></p> <p>Head of Access to Education</p> <p>Modernisation Team Manager</p>	<p><b>Tel Nos. / E-Mail Addresses:</b></p> <p>01267 246471 <a href="mailto:SiDavies@carmarthenshire.gov.uk">SiDavies@carmarthenshire.gov.uk</a></p> <p>01267 246618 <a href="mailto:SMGriffiths@carmarthenshire.gov.uk">SMGriffiths@carmarthenshire.gov.uk</a></p>
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# EXECUTIVE SUMMARY

**EXECUTIVE BOARD  
21<sup>ST</sup> DECEMBER 2020**

## **MODERNISING EDUCATION PROGRAMME PROPOSAL TO RELOCATE YSGOL HEOL GOFFA TO A NEW SITE AND INCREASE ITS CAPACITY FROM 75 TO 120**

### **Background**

Ysgol Heol Goffa is a special school located in Llanelli and is maintained by Carmarthenshire County Council. The school caters for 75 pupils between the ages of 3-19 years old who have severe learning difficulties (SLD) or profound and multiple learning difficulties (PMLD). All pupils have a Statement of Special Educational Needs or Individual Development Plan (IDP).

Ysgol Heol Goffa is currently over-subscribed and this trend is likely to continue for the foreseeable future. There is increased demand for places which is putting significant pressure on the Local Authority to place pupils. The current capacity of Ysgol Heol Goffa is 75 with 101 pupils on roll as at January 2020 PLASC.

As a result, the Local Authority are currently developing a scheme to increase the capacity of Ysgol Heol Goffa to 120 places for pupils aged 3-19 who have severe learning difficulties (SLD) or profound and multiple learning difficulties (PMLD) by providing a new school with facilities fit for the 21<sup>st</sup> Century on a new site. The proposed new site is located next to the recently completed Ysgol Pen Rhos.

### **The Proposal**

The proposal is to relocate Ysgol Heol Goffa to a new site and increase its capacity from 75 to 120.

In accordance with Executive Board's instructions on the 18<sup>th</sup> November 2019 a formal consultation exercise was undertaken from 21 September 2020 to 1 November 2020. The results of the consultation exercise are contained in the attached Consultation Report.

The E&C Scrutiny Committee were provided the opportunity to offer comment and a recommendation to the Executive Board whether or not to publish a Statutory Notice. Should the Executive Board grant permission to proceed to Statutory Notice, the intention is to publish on 11<sup>th</sup> January 2021.

If approved, following the end of the Statutory Notice period, an objection report which summarises any objections received by stakeholders, will be presented to the E&C Scrutiny Committee and Executive Board and ultimately County Council for determination.

### **Recommendation**

It is recommended that the Executive Board approves the publication of a statutory notice to implement the proposal.

**DETAILED REPORT ATTACHED?**

**YES: Consultation Document  
Consultation Report**



# IMPLICATIONS

I confirm that other than those implications which have been agreed with the appropriate Directors / Heads of Service and are referred to in detail below, there are no other implications associated with this report.

Signed:



Head of Access to Education

Policy, Crime & Disorder and Equalities	Legal	Finance	ICT	Risk Management Issues	Staffing Implications	Physical Assets
YES	YES	YES	NONE	YES	YES	YES

## 1. Policy, Crime & Disorder and Equalities

Developments are consistent with the Authority's Corporate Strategy and the Modernising Education Strategic Outline Programme.

## 2. Legal

Appropriate consultation was initiated in accordance with the relevant statutory procedures and School Organisation Code 2018.

## 3. Finance

Revenue implications will be catered for within the Local Management of Schools Fair Funding Scheme.

## 4. ICT

None

## 5. Risk Management Issues

Continuing with the current capacity of the school would not address the capacity issues. The statutory consultation is required to relocate and increase the capacity of the school.

## 6. Staffing Implications

Staffing implications will be addressed in accordance with the County Council's Policy and Procedures.

## 7. Physical Assets

As a result of the scheme to provide Ysgol Heol Goffa with a new school building, the school will re-locate to a new building with a capacity of 120 places.

# CONSULTATIONS

I confirm that the appropriate consultations have taken in place and the outcomes are as detailed below:

Signed:  Head of Access to Education

**1. Scrutiny Committee** – Were consulted on 15 October 2019 and during the formal consultation period and again on 23 November 2020.

The Education & Children Scrutiny Committee unanimously resolved:

- That the report be endorsed;
- To recommend to the Executive Board the publication of a Statutory Notice.

**2. Local Member(s)** – The local members are aware of the proposal and have been consulted during the formal consultation period.

**3. Community / Town Council** – Consulted during the formal consultation period.

**4. Relevant Partners** – Consulted during the formal consultation period.

**5. Staff Side Representatives and other Organisations** – Consulted during the formal consultation period.

**EXECUTIVE BOARD PORTFOLIO  
HOLDER AWARE/CONSULTED**

YES

**Section 100D Local Government Act, 1972 – Access to Information  
List of Background Papers used in the preparation of this report:**

Title of Document	File Ref No. / Locations that the papers are available for public inspection
Stage 2 (Permission to Notice) – ECS Scrutiny Report	<a href="https://carmarthenshireintranet.moderngov.co.uk/documents/g3311/Printed%20minutes%2023rd-Nov-2020%2010.00%20Education%20Children%20Scrutiny%20Committee.pdf?T=1">https://carmarthenshireintranet.moderngov.co.uk/documents/g3311/Printed%20minutes%2023rd-Nov-2020%2010.00%20Education%20Children%20Scrutiny%20Committee.pdf?T=1</a>
Consultation Report	<a href="https://www.carmarthenshire.gov.wales/home/council-services/education-schools/modernising-education-programme/consultation/special-school/ysgol-heol-goffa/">https://www.carmarthenshire.gov.wales/home/council-services/education-schools/modernising-education-programme/consultation/special-school/ysgol-heol-goffa/</a>
Stage 1 (Permission to Consult) – Executive Board Report	<a href="http://democracy.carmarthenshire.gov.wales/ieListDocuments.aspx?CId=131&amp;MId=2079&amp;Ver=4">http://democracy.carmarthenshire.gov.wales/ieListDocuments.aspx?CId=131&amp;MId=2079&amp;Ver=4</a>
Stage 1 (Permission to Consult) – ECS Scrutiny Committee Report	<a href="http://democracy.carmarthenshire.gov.wales/ieListDocuments.aspx?CId=153&amp;MId=3552&amp;Ver=4">http://democracy.carmarthenshire.gov.wales/ieListDocuments.aspx?CId=153&amp;MId=3552&amp;Ver=4</a>
Consultation Document	<a href="https://www.carmarthenshire.gov.wales/media/1223723/proposal-to-relocate-ysgol-heol-goffa-and-increase-its-capacity.pdf">https://www.carmarthenshire.gov.wales/media/1223723/proposal-to-relocate-ysgol-heol-goffa-and-increase-its-capacity.pdf</a>
Carmarthenshire's Welsh in Education Strategic Plan	<a href="https://www.carmarthenshire.gov.wales/home/council-democracy/strategies-and-plans/welsh-in-education-strategic-plan/">https://www.carmarthenshire.gov.wales/home/council-democracy/strategies-and-plans/welsh-in-education-strategic-plan/</a>
MEP Biennial Review	<a href="http://www.carmarthenshire.gov.uk">www.carmarthenshire.gov.uk</a> Executive Board 20 <sup>th</sup> June 2016
21 <sup>st</sup> Century Schools Website	<a href="http://www.21stcenturyschools.org">www.21stcenturyschools.org</a>

Proposal to relocate Ysgol Heol Goffa to a new site and increase its capacity from 75 to 120

# Consultation Document



[carmarthenshire.gov.uk](http://carmarthenshire.gov.uk)



## **School Modernisation Section**

**Sara Griffiths**, Modernisation Team Manager

If you require this information in large print, Braille or on audiotape please contact the Department for Education & Children

**Email:** [DECMEP@cararthenshire.gov.uk](mailto:DECMEP@cararthenshire.gov.uk)

**Telephone:** 01267 246476

As part of its statutory obligation to keep the number and type of school places under review, the County Council has adopted a wide-ranging programme designed to improve school buildings and enhance opportunities for learning. The strategy reflects the vision and policies established by the County Council which embrace the requirement to deliver services, to clear standards – covering both cost and quality – by the most economic and effective means. In our drive to continually improve on the services made available to all learners, we must maximise the finite resources available to the Council, and continue to work in partnership with all those who have a contribution to make to the process of learning and the wellbeing of both children and their families. Schools of the future will need to serve as a focus for a wide range of services dedicated to serving the needs of the community through a joined up approach.

Carmarthenshire is blessed with many very able education leaders and teachers but the continuing changes to the curriculum places a heavy demand on their skills to meet the wide ranging demands of all children. Although the processes of learning, and skills of teaching, are extremely important, deep subject knowledge on the part of the teacher is essential if learners with their various gifts in different areas are to discover and develop their talents to the full.

Schools designed to meet current demands are expected to provide a broad and balanced curriculum through high quality and inspirational teaching. In the planning of new provision it will be important to ensure that our schools are properly equipped to enhance opportunities for social inclusion, sustainable development, equal opportunities and bilingualism. In practical terms we need to ensure that provision reflects the changing patterns of population, with schools based in the right location with accommodation and facilities fit to serve the needs of all learners in the twenty first century.

Consultation will follow the guidelines established by the Welsh Government and will involve identified interested parties. The information set out in this document is intended to clarify the proposals for your school and support the consultation process.



**Gareth Morgans**

Director of Education and Children's Services

## Glossary of Abbreviations

<b>ALN</b>	Additional Learning Needs
<b>AN</b>	Admission number
<b>CCC</b>	Carmarthenshire County Council
<b>CP</b>	Community Primary
<b>DS</b>	Dual Stream
<b>EM</b>	English medium
<b>Estyn</b>	Her Majesty's Inspectorate for Education and Training in Wales
<b>FTE</b>	Full Time Equivalent
<b>LA</b>	Local Authority
<b>MCSW</b>	Measuring the Capacity of Schools in Wales
<b>MEP</b>	Modernising Education Programme
<b>NOR</b>	Number on Roll
<b>PLASC</b>	Pupil Level Annual School Census Data
<b>PMLD</b>	Profound and Multiple Learning Difficulties
<b>PT</b>	Part time
<b>SLD</b>	Severe Learning Difficulties
<b>WESP</b>	Welsh in Education Strategic Plan
<b>WG</b>	Welsh Government
<b>WM</b>	Welsh medium

## Content

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3.	School(s) affected by this proposal	13
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## 1. Introduction / Background / Rationale for Change

### Current Provision/ Status Quo/ Background

Carmarthenshire County Council makes primary and secondary SLD/PMLD provision in the East and West of the county through specialist settings attached to mainstream schools however Ysgol Heol Goffa is the only standalone Special School for PMLDs / SLD within Carmarthenshire.

Ysgol Heol Goffa is a special school located in Llanelli and is maintained by Carmarthenshire County Council. The school caters for 75 pupils between the ages of 3-19 years old who have severe learning difficulties (SLD) or profound and multiple learning difficulties (PMLD). All pupils have a Statement of Special Educational Needs or Individual Development Plan (IDP). Ysgol Heol Goffa is the only special school within Carmarthenshire that caters for pupils with SLD and PMLD and therefore the catchment area for the school is the whole of Carmarthenshire.

Learners are taught in 10 class groups and a typical class would have one teacher and three teaching assistants for eight pupils however the school has to be flexible to meet the needs of the children. The adult/pupil ratio ensures that the individual care and educational needs of the pupils can be met. The school is supported by the physiotherapy, occupational therapy service and the speech and language therapy service. The Local Authority's sensory impairment team, educational psychologist and behaviour teams also work with the school. The school facilities include a purpose built PMLD classroom, sensory rooms, a soft play area, outdoor sensory gardens, rebound therapy facilities, an adventure play area and outdoor learning areas.

### Rationale for Change

Ysgol Heol Goffa is currently over-subscribed and this trend is likely to continue for the foreseeable future. There is increased demand for places which is putting significant pressure on the Local Authority to place pupils. The current capacity of Ysgol Heol Goffa is 75 with 101 pupils on roll as at January 2020 PLASC.

As a result, the Local Authority are currently developing a scheme to increase the capacity of Ysgol Heol Goffa to 120 places for pupils aged 3-19 who have severe learning difficulties (SLD) or profound and multiple learning difficulties (PMLD) by providing a new school with facilities fit for the 21<sup>st</sup> Century on a new site.

The proposed new site is located next to the recently completed Ysgol Pen Rhos which is approximately 3.8 miles from the current school site. The site is within the ownership of Carmarthenshire County Council.



The current site and layout of Ysgol Heol Goffa is poor, this is highlighted by the overcrowded mini bus collection and drop off at the start and end of each school day and the lack of sufficient car parking at the front of the school.

A more recent Estyn inspection completed in March 2017 reported that the Learning Environment was 'adequate' noting that areas of the school building in particular the school hall and teaching areas for the post 16 pupils limit significantly the range of learning opportunities that can take place on site. The lack of an on-site hydrotherapy pool was also reported as a shortcoming.

The proposed new school building would overcome these difficulties noted by Estyn by providing 21<sup>st</sup> Century Facilities to meet the needs of children with more complex needs and profound special educational needs. The proposed development would provide additional space and better provision for teaching post 16 pupils with life skills and vocational skills as well as more space and better play provision on the proposed new school site.

The proposed investment will be funded (75% Welsh Government, 25% Local Authority) subject to business case approval by Welsh Government.

The new school will have the following benefits:

- Increase places available for pupils in the area with complex and profound special educational needs;
- 21<sup>st</sup> Century School facilities to meet the needs of children with more complex needs and profound special educational needs;
- Hydro pool facility integrated within the school building;
- New facilities with the required resources such as sensory rooms, specialist therapy rooms, therapeutic external learning environments etc.
- Better learning environment for the children and young people attending the new school;
- More space and better play provision on the school site;
- More space and better provision for teaching young people life skills and vocational skills;
- Specialist provision and specialist resources with therapy rooms available at the new school site;
- A range of learning experiences to develop independence and life skills in preparation for adulthood; and
- Opportunity to share resources with the newly opened Ysgol Pen Rhos adjacent to the proposed new site.

## 2. The Consultation Process

### The Consultation Process

The consultation on this proposal will follow guidelines established by the Welsh Government as stated in the School Organisation Code (2018).

### Who will be consulted?

This document will be sent to the following interested parties:

Staff (Teaching and Ancillary) – Ysgol Heol Goffa	Director of Education – All Neighbouring Authorities
Governors and Parents/Guardians – Ysgol Heol Goffa Primary School	Diocesan Director of Education Church in Wales and RC
Local County Councillors	Estyn
Community Councillors Llanelli Town Council	Regional Transport Consortium
Assembly Member (AM) / Regional Members / Members of Parliament (MP)	*All schools within Carmarthenshire
Welsh Ministers	All relevant unions
SEN Partners	Communities for Work
LA Special Educational Needs Division	Legacy
ERW – Education through Regional Working	Fusion
Families First Carmarthenshire	Public Services Board
Child Care / Early Years	Local Police and Crime Commissioner
Communities First Partnership	Flying Start
Welsh Language Commissioner	

\* Consultation document sent to Headteacher and Chair of Governors of all Primary and Secondary Schools in Carmarthenshire.

## Consultation Period

The consultation period for this proposal starts on 21 September 2020 and ends on 1 November 2020.

Consultees can submit their views in favour of or against a proposal. Responses received during the consultation period will not be treated as statutory objections. If consultees wish to object, they will need to do so in writing during the statutory objection period outlined on page 10.

### Considering your views

During the consultation period you can ask questions and express your views by writing a letter to the address below or by completing an online survey using the following link:

<https://carmarthenshire.researchfeedback.net/wh/s.asp?k=158099067725>

Letters should be sent to the following address by no later than noon on 1 November 2020.

Mr Gareth Morgans, Director of Education and Children's Services,  
Building 2, St. David's Park, Jobs Well Road, Carmarthen, SA31 3HB  
Or E-mail to: [DECMEP@carmarthenshire.gov.uk](mailto:DECMEP@carmarthenshire.gov.uk)

### Drop in Session

Due to the ongoing implications of the Coronavirus issue we have been advised to postpone all events where there is interaction between staff, parents and the wider community and as a result there will not be a drop in session to discuss proposals. Should you feel strongly about discussing the proposals please contact Mrs Sharon James by sending an e-mail to [DECMEP@carmarthenshire.gov.uk](mailto:DECMEP@carmarthenshire.gov.uk) and a virtual meeting can be arranged.

### Consultation with Pupils

There will be an opportunity for the pupils of Ysgol Heol Goffa to participate in the consultation process during a session which will be conducted at the school.

The information gathered from the consultation with pupils will form part of the consultation report which will be submitted to the Executive Board for consideration following the consultation period.

## **Consultation Report**

A consultation report will be published on Carmarthenshire County Council's website at least 2 weeks before a decision is made on whether or not to proceed to publish a statutory notice. Hard copies of the report will also be available on request. The report will summarise the observations submitted by consultees and provide Carmarthenshire County Council's response to these observations. The report will also contain Estyn's view of the proposal and details of consultation undertaken with the pupils.

The Executive Board of Carmarthenshire County Council will consider the consultation report and decide whether or not to proceed with the proposal.

If the Executive Board decides to continue with the proposal Carmarthenshire County Council must publish a statutory notice.

## **Statutory Notice**

The statutory notice will be published on Carmarthenshire County Council's website and displayed at Ysgol Heol Goffa. Copies of the notice will be made available to the school to distribute to pupils, parents, guardians, and staff members (the school may also distribute the notice by email).

### **Statutory Objection Period**

The statutory notice will set out the details of the proposal and invite anyone who wishes to object to do so in writing within a period of 28 days. If objections are received an objection report will be published on the Carmarthenshire County Council website. Hard copies of the report will also be available on request. The report will summarise the issues raised and provide Carmarthenshire County Council's response to those objections.

## **Determination of Proposal**

Carmarthenshire County Council will determine the proposal. The County Council may decide to approve, reject or approve the proposal with modifications. In doing so, the County Council will take into account any statutory objections that it received.

## Decision Notification

Following determination of proposals all interested parties will be informed and advised of the availability of the decision which will be published electronically on Carmarthenshire County Council's website.

## The Statutory Process Time-Table

The statutory process and timetable will be as follows:

21 September 2020	Issue of this consultation document to identified and other interested parties.
1 November 2020	Closing date for views on the proposal to be received by the Department for Education and Children.
22 December 2020	<p>A Consultation Report will be taken to the Executive Board for a decision on whether or not to proceed to publish a statutory notice. OR alternatively proposal ends.</p> <p>The Consultation Report will be published on Carmarthenshire County Council's website at least 2 weeks prior to the publication of a statutory notice.</p> <p>If the decision is made to proceed then a statutory notice will be published. The notice will outline details of the proposal and be published on the Council's web site and be displayed near the entrance of the school and schools which are subject to the proposals. Copies of the notice will be made available to the school to distribute to parents, guardians and staff members.</p> <p>Following publication there will be a 28 day period during which time formal written objections will be invited.</p> <p>The statutory notice will give details on how you may record your objections to the proposal.</p>
February 2021	End of formal 28 day notice period for objections. County Council will determine the proposal. The County Council may decide to approve, reject or approve the proposal with modifications, in doing so the County Council will take into account any statutory objections received.

May 2021	<p>Deadline to notify parents of intention to implement proposal.</p> <p>Following determination of proposals all interested parties will be informed and advised of the availability of the decision which will be published electronically on Carmarthenshire County Council's website.</p>
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### 3. School (s) affected by this proposal

The catchment area of Ysgol Heol Goffa covers the whole of Carmarthenshire therefore all schools will be notified of the proposal.

<b>School Name</b>		Ysgol Heol Goffa
<b>School Location</b>		SA15 3LS
<b>County</b>		<b>Carmarthenshire</b>
<b>Age Range</b>		3-19
<b>School Category</b> (Community [C], Voluntary Aided [VA], Voluntary Controlled [VC]), Special		Special School
<b>Language Medium Category</b>		English Medium
<b>Number of registered Pupils (January 2020)</b>	<b>Nursery</b>	4
	<b>Primary</b>	42
	<b>11 to 16</b>	38
	<b>Post-16</b>	17
	<b>Total</b>	<b>101</b>
<b>Number of pupils previously on the register</b>	<b>January 2019</b>	95
	<b>January 2018</b>	86
	<b>January 2017</b>	76
	<b>January 2016</b>	75
<b>Pupil Projections</b>	<b>January 2020</b>	N/A
	<b>January 2021</b>	N/A
	<b>January 2022</b>	N/A
	<b>January 2023</b>	N/A
	<b>January 2024</b>	N/A
<b>Capacity</b>		<b>75</b>
<b>Cost per pupil (2020-21)</b>		£22,210
<b>School Budget ( 2020-21)</b>		2,110 (£k)
<b>School Categorisation (2019)</b>		<b>GREEN</b>
<b>Estyn Inspection Result</b>		<a href="#">Estyn Inspection Report - Ysgol Heol Goffa</a>
<b>Building Condition Category</b>		<b>C</b>

## Estyn Inspections

As part of a national programme of school inspections, Estyn commissions reviews of all schools. The most recent Estyn inspection for Ysgol Heol Goffa took place in March 2017 and consultees may access the finding either via the Estyn website at [www.estyn.gov.uk](http://www.estyn.gov.uk) or you may request a copy from the Local Authority (for which a charge in respect of photocopying may be made).

During each inspection, inspectors aim to answer three key questions:

- Key Question 1: How good are the outcomes?
- Key Question 2: How good is provision?
- Key Question 3: How good are leadership and management?

In these evaluations, inspectors use a four-point scale:

Judgement	What the judgement means
Excellent	Many strengths, including significant examples of sector-leading practice
Good	Many strengths and no important areas requiring significant improvement
Adequate	Strengths outweigh areas for improvement
Unsatisfactory	Important areas for improvement outweigh strengths

More detail on the common inspection framework can be accessed via this link-  
<https://www.estyn.gov.wales/inspection/inspection-explained/common-inspection-framework>

The inspection judgements for Ysgol Heol Goffa are shown in the following table:

Inspection Area	Judgement
How good are outcomes?	Good
How good is provision?	Excellent
How good are leadership and management	Excellent



## 4. The Proposal – Ysgol Heol Goffa

### The Proposal

Due to the increase in demand for pupil places the proposal is to:

Relocate Ysgol Heol Goffa to a new site and increase its capacity from 75 to 120 from September 2023 when occupation of the new school building is proposed.

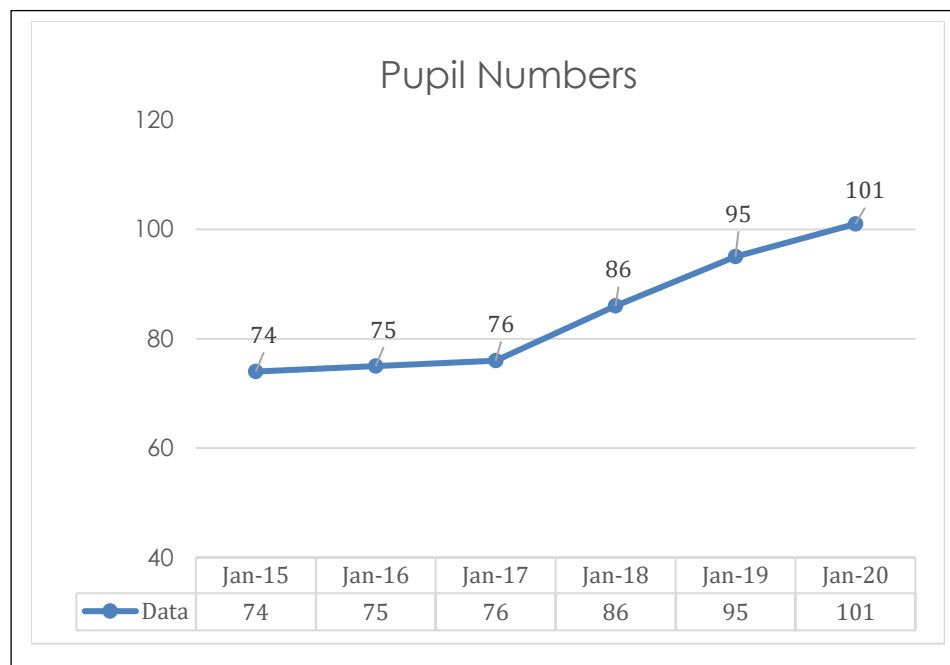
### Background

Ysgol Heol Goffa is a special school located in Llanelli and is maintained by Carmarthenshire County Council. The school provides placements for pupils aged from 3 to 19 with severe or profound and multiple learning difficulties.

### Rationale for Change

The current school is over-subscribed at present with 101 pupils on roll as at January 2020 and does not meet the needs of the learners, as a result the Local Authority are currently developing a scheme to provide Ysgol Heol Goffa with a new school building on a new site with facilities fit for the 21<sup>st</sup> Century.

The chart below shows the increase in pupil numbers attending Ysgol Heol Goffa between January 2015 and January 2020 (PLASC).



## Capacity Information

	Jan 15	Jan 16	Jan 17	Jan 18	Jan 19	Jan 20
Ysgol Heol Goffa Capacity	75	75	75	75	75	75
Pupil Numbers	74	75	76	86	95	101
Surplus	1	0	+1	+11	+20	+26

As can be seen from the table, Ysgol Heol Goffa has been over capacity for a number of years. This proposal will overcome these issues by providing a new school building with capacity for 120 pupils with facilities fit for the 21<sup>st</sup> Century.

## School Catchment Area

The catchment area of Ysgol Heol Goffa covers the whole of Carmarthenshire. This will not change as part of this proposal.

## Transitional Arrangements

There will be no change for pupils. Pupils will remain at the existing school site until the new build school is ready for occupation.

## Advantages and Disadvantages of the Proposal / Scheme

### Advantages

- New build school with 21<sup>st</sup> Century Facilities
- Hydro Pool integrated within the school building
- Increase capacity to 120 places
- More space and better play provision on the new school site
- Opportunity to share resources with the newly opened Ysgol Pen Rhos adjacent to the proposed new site.

### Disadvantages

- Increase in travelling for some pupils
- Approval of business cases from Welsh Government for 75% grant funding to build the new school required.

## Risks and Counter Measures

	Risk	Counter Measure
1.	Failure to obtain statutory approval to implement the proposal.	- Follow guidelines as set out in the School Organisation Code 2018.
2.	Demand for provision diminishes.	- This is unlikely as the demand for places outweigh the

		number of places currently available.
3.	Increased travelling times for some pupils.	- Transport will be provided in accordance with the requirements of a Statement of Special Educational Needs issued by the Authority or where a pupil/learner is the subject of the statutory assessment procedure where learning difficulties which the LA considers makes transport 'necessary'. Assessments will be subject to regular review. The type and nature of transport provided will be determined by a Risk Assessment.
4.	Integration of pupils into the new school building.	- The Authority will work with the pupils to ensure smooth transition and integration into the new school.

## WESP

Ysgol Heol Goffa has been categorised as an English medium language category special school.

The Local Authority is committed to providing a bilingual service to Carmarthenshire's learners. The Authority recognises that bilingual provision in our Special Schools and Units is limited. We will work with these settings in developing bilingual provision to ensure that learners with complex additional needs can access bilingual provision and support in their chosen language.

The majority of pupils respond appropriately to Welsh greetings and can use common greeting words in the correct context. Nearly all pupils develop their understanding of the culture and heritage of Wales effectively.

The school plans suitably to develop pupils' Welsh language skills. There are many opportunities for pupils to develop their understanding of Welsh culture and heritage, for example through the school's annual eisteddfod and residential trips to Llangrannog.

## Financial Implications – Revenue

Ysgol Heol Goffa is funded in accordance with the County Council's Fair Funding policy and will receive resources on the same basis as any other school within the County Council, based on the new school's pupil numbers and facilities.

## Admission Arrangements

Admission to Ysgol Heol Goffa is via an inclusion panel made up of Headteachers and representatives of the Authority. Referrals to the admissions panel are made by the Education Department via the placement panel following consultation with representatives from the Health and Social Services Departments.

## Alternative options Considered

In developing a preferred option the Authority considered a range of alternative options.

Option 1	Status Quo	Discounted due to insufficient capacity for current number on roll, confined site.
Option 2	Refurbish / Remodel current school site	Insufficient outdoor area to develop current school site.
Option 3	New build 90 capacity school providing 21 <sup>st</sup> Century facilities with a 5 bed respite centre.	Capacity insufficient as there are 101 pupils on roll (January 2020).
Option 4 (Preferred)	New build 120 capacity school providing 21 <sup>st</sup> Century facility with a 5 bed respite centre and small hydro pool.	Preferred option for the medium to long term.
Option 5	New build 120 capacity school providing 21 <sup>st</sup> Century facility with a 6 bed respite unit and full size hydro pool.	Discounted due to the scope of the maximum option exceeding the requirements of the area.

## Transport Impact Assessment

Transport will be provided in accordance with the requirements of a Statement of Special Educational Needs issued by the Authority or where a pupil/learner is the subject of the statutory assessment procedure where they have learning difficulties which the Local Authority considers makes transport 'necessary'. Assessments will be subject to regular review. The type and nature of transport

provided will be determined by a Risk Assessment. The site for the new school is approximately 3.8 miles from the current site of Ysgol Heol Goffa.

### **Capital Receipts**

Any capital receipts received as a result of this proposal will be re-invested into the Modernising Education Programme.

### **Community Impact Assessment**

Please refer to Appendix A of this consultation document for full details of the Community Impact Assessment undertaken.

### **Welsh Language Impact Assessment**

Please refer to Appendix B of this consultation document for full detail of the Welsh Language Impact Assessment undertaken.

### **Equality Impact Assessment**

Please refer to Appendix C of this consultation document for full details of the Equality Impact Assessment undertaken.

## 5. Evaluation of Present Arrangements

### Quality and standards in education

#### Standards

It is not appropriate to compare the standards that pupils achieve at the school with national averages or to analyse trends in overall performance over time because of the wide range of pupils' special educational needs. There is no significant difference between the performance of all pupils and that of boys and girls, those pupils eligible for free school meals or those who are looked after by a local authority.

By the time they leave the school, all leavers gain at least one or more qualifications in accredited courses that are well matched to their individual needs and abilities.

#### Teaching and learning experiences

The quality of teaching is consistently high across the school. All teachers have high expectations of what pupils can achieve. They challenge pupils appropriately to concentrate and complete tasks to the best of their ability.

Teachers and support staff work closely together as a strong and effective team. All staff manage challenging behaviour very skilfully and this enables pupils to remain engaged with their learning and to make progress.

The school provides a broad and balanced curriculum that meets the needs of the pupils exceptionally well. Teachers plan collaboratively to make highly effective use of the school's resources and ensure stimulating and engaging learning experiences across the school.

There is a strong emphasis throughout the school on ensuring pupils develop the skills they need to become more independent. The school provides an extensive range of extra-curricular activities, clubs and residential experiences, including music, drama, netball and gardening. These are highly effective in developing pupils' confidence and the wider skills they will need in their future lives. Post-16 pupils have relevant opportunities to participate in work experience and enterprise activities which prepare them well for the world of work.

## **Care, support and guidance**

The school provides a very high level of care, support and guidance for its pupils. The school's procedures to promote awareness of healthy lifestyles and to develop pupil' wellbeing are exemplary. There is extensive provision for pupils to engage in activities that develop their physical and emotional wellbeing.

The school works very effectively with professionals from a suitable range of agencies, which ensures effective collaborative planning for pupils' individual health needs.

The school provides extensive opportunities for pupils to develop important life skills, such as learning how to be safe online, how to shop and how to prepare healthy meals.

There are highly effective policies and procedures in place for managing pupil behaviour, which staff apply exceptionally well. Staff build positive relationships with pupils and manage pupil behaviour skilfully.

## **Leadership and Management**

The Headteacher and members of the senior leadership team provide exceptional leadership for the school. They communicate a clear strategic direction for the school that focuses well on developing pupils' academic and social skills through providing relevant, enjoyable and challenging learning experiences.

The senior leadership team are highly effective in developing the leadership skills of the many staff who have responsibility for co-ordinating subjects and leading school improvement projects.

## **Impact of the proposal**

If approved, the proposal will provide a high quality learning environment in support of enhancing outcomes for all learners. Much research has demonstrated that learners achieve better outcomes when the learning environment is of the highest quality.

This proposal will ensure that the already excellent standards will be maintained and indeed improved as a result of this proposed investment.

## **Need for places and the impact on accessibility of schools**

The County Council has considered the sufficiency of places and the likely demand for places in the future.

## **Resourcing of education and other financial implications**

As can be seen on page 13 there is currently a shortfall of places available at the current Ysgol Heol Goffa. This proposal will ensure that there are sufficient pupil places in a special school for the medium to long term.

## **Surplus Places / Capacity Issues**

The capacity of Ysgol Heol Goffa is 75 however based on January 2020 pupil data there are 101 pupils on roll which is 26 places over capacity. To meet current and future demand an increase in capacity is required for the medium to long term. If provision is not increased pupils may have to travel out of county to receive the specialist care they require at a substantial cost to the Local Authority.

## **Transport Costs**

Transport arrangements will be made in accordance with the County Council's home to school transport policy.

## **Capital Costs / Capital Receipts**

If the proposal is approved the new school will address the current shortfall in capacity as part of the Council's 21<sup>st</sup> Century Schools Programme.

This investment will be funded (75% Welsh Government, 25% Local Authority) subject to business case approval by Welsh Government.



## 6. Appendix A- Community Impact Assessment

Ward Profiles – Ysgol Heol Goffa is currently within the Lliedi ward, the ward profile can be viewed by clicking on the following link [Ward Profile Lliedi](#)

The Lliedi ward is within a community's first area.

The new school site will be within the Tyisha / Glanymor ward.

### Proposed Development

If approved the proposed new school improvements would bring significant benefits to pupils and the community as noted below:

- **Pupils**

This proposal seeks to ensure a high quality learning environment increasing places available for pupils in the area with complex and profound special educational needs. The improved facilities will directly enhance teaching and learning for learners developing a school with the necessary resources namely sensory rooms, therapy rooms, therapeutic external teaching environments etc. It would offer learners more space and better play provision and more space and better provision for teaching young people life skills and vocational skills. Pupils would benefit from sharing a 3G pitch with Ysgol Pen Rhos located adjacent to the proposed new site for Ysgol Heol Goffa.

- **The Community**

The proposed new school would benefit the community from the use of the specialist facilities outside of school hours.

- A range of easily accessible outdoor spaces (a useful learning and teaching environment invaluable for recreational, social and extended school and community use). The outdoor space will include access to a MUGA (Multi Use Games Area).
- Community use of ICT resources such as Braille keyboards for visitors as well as for the pupils and staff.
- Sharing of a 3G pitch with Ysgol Pen Rhos located adjacent to the proposed new site.
- A purpose built 5 bed respite centre.
- A hydro pool.

Secure access points will be designed into the scheme which will allow the community to access the school building and external hard play areas during the evenings and weekends in co-operation with the Headteacher.

## 7. Appendix B- Welsh Language Impact Assessment

Carmarthenshire County Council's vision is to provide a service, which will ensure access to high quality learning opportunities for all children, young people and adults, this enabling the achievement of their full potential within the context of the unique bilingual nature of the county.

The language category of Ysgol Heol Goffa is English medium and English is the main language of nearly all pupils.

The majority of pupils respond appropriately to Welsh greetings and can use common greeting words in the correct context. Nearly all pupils develop their understanding of the culture and heritage of Wales effectively.

The school plans suitably to develop pupils' Welsh language skills. There are many opportunities for pupils to develop their understanding of Welsh culture and heritage an example being the school's annual eisteddfod and residential trips to the Urdd camp in Llangrannog.

## 8. Appendix C- Equalities Impact Assessment

### Carmarthenshire County Council

#### Assessing Impact

##### The Equality Act 2010

The Equality Act 2010 (the Act) brings together and replaces the previous anti-discrimination laws with a single Act. It simplifies and strengthens the law, removes inconsistencies and makes it easier for people to understand and comply with it. The majority of the Act came into force on 1 October 2010.

The Act includes a new public sector equality duty (the 'general duty'), replacing the separate duties on race, disability and gender equality. This came into force on 5 April 2011.

##### What is the general duty?

The aim of the general duty is to ensure that public authorities and those carrying out a public function consider how they can positively contribute to a fairer society through advancing equality and good relations in their day-to-day activities. The duty ensures that equality considerations are built into the design of policies and the delivery of services and that they are kept under review. This will achieve better outcomes for all.

The duties are legal obligations. Failure to meet the duties may result in authorities being exposed to legal challenge.

Under equality legislation, public authorities have legal duties to pay 'due regard' to the need to eliminate discrimination and promote equality with regard to race, disability and gender, including gender reassignment, as well as to promote good race relations. The Equality Act 2010 introduces a new public sector duty which extends this coverage to age, sexual orientation, pregnancy and maternity, and religion or belief. The law requires that this duty to pay 'due regard' be demonstrated in the decision making process. It is also important to note that public authorities subject to the equality duties are also likely to be subject to the

obligations under the Human Rights Act and it is therefore wise also to consider the potential impact that decisions could have on human rights as part of the same process.

### **Carmarthenshire's approach to Equality Impact**

In order to ensure that the council is considering the potential equality impact of its proposed policies and practices, and in order to evidence that we have done so, every proposal will be required to be supported by the attached Equality Impact Assessment. Where this assessment identifies a significant impact then more detail may be required.

### **Reporting on assessments**

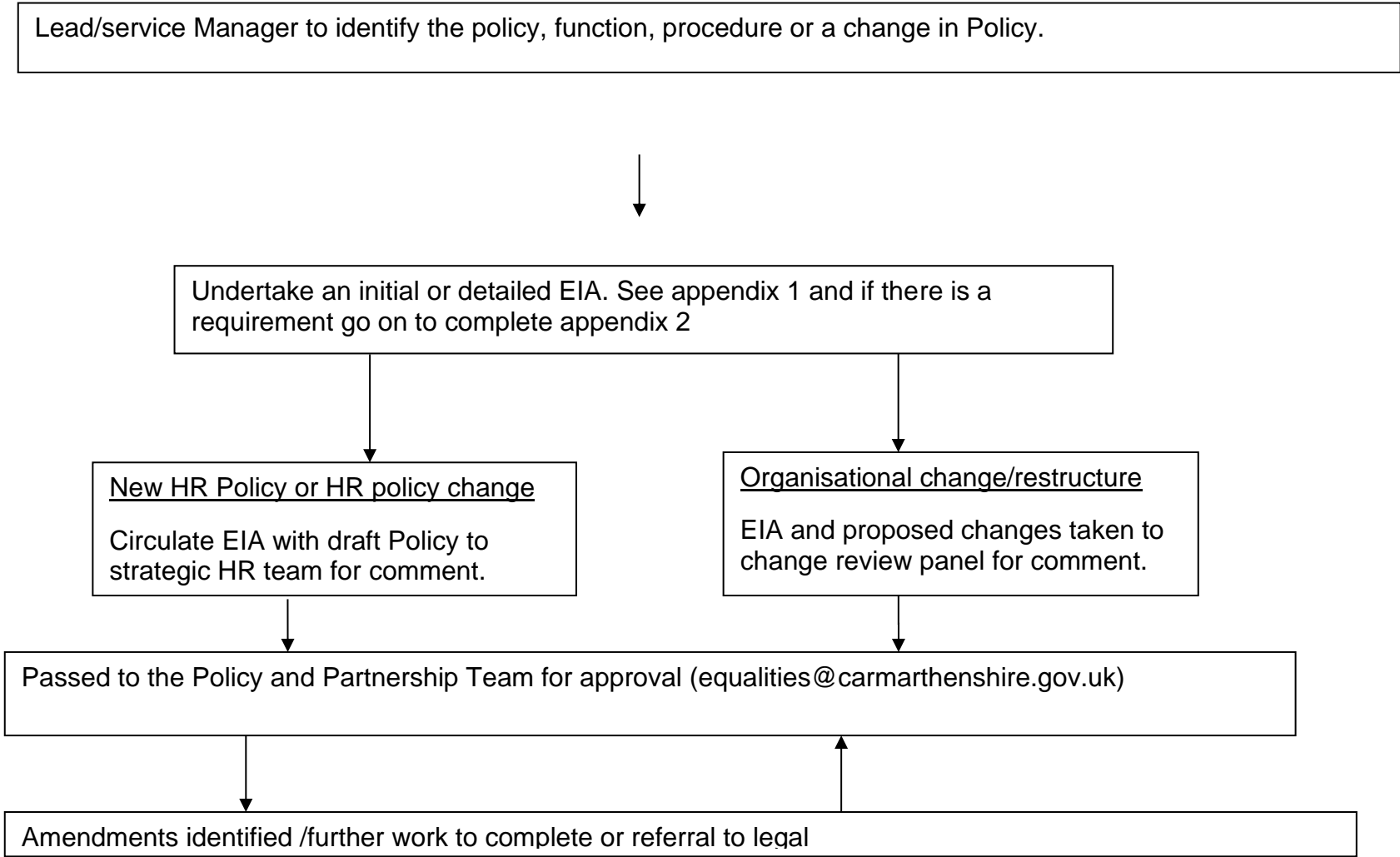
Where it is clear from the assessment that the likely impact on the authority's ability to meet the general duty is substantial, then it must publish a report.

### **Initial and Detailed Equality Impact Assessments**

The initial EIA (appendix 1) is a simple and quick method of assessing the effect of a policy, function, procedure, decision including financial cuts on one or more of the protected characteristics.

The Service Manager responsible for the relevant new or revised policies, functions, procedures and financial decisions must undertake, at least, an initial EIA and where relevant a detailed Equality Impact Assessment (appendix 2); EIA must be attached as background paper with reports to Executive and Scrutiny.

**Equality impact assessment – Process to follow where HR implications have been identified**



## Initial Equalities Impact Assessment Template

### Appendix 1

<b>Department:</b> Education & Children	<b>Completed by (lead):</b> Sara Griffiths	<b>Date of initial assessment:</b> June 2020  <b>Revision Dates:</b> June 2021
<b>Area to be assessed: (i.e. name of policy, function, procedure, practice or a financial decision)</b>	To increase the capacity of Ysgol Heol Goffa and re-locate to a new school site with 21 <sup>st</sup> Century Facilities.	
<b>Is this existing or new function/policy, procedure, practice or decision?</b>	School Re-organisation Proposal – Modernising Education Programme	
<b>What evidence has been used to inform the assessment and policy? (please list only)</b>		
<ul style="list-style-type: none"> <li>• 21<sup>st</sup> Century Schools Programme</li> <li>• Modernising Education Programme</li> <li>• Welsh Government Guidance School Organisation Code 2018</li> <li>• PLASC Data 2020</li> <li>• The Well-being of Future Generations (Wales) Act 2015</li> </ul>		

<b>1. Describe the aims, objectives or purpose of the proposed function/policy, practice, procedure or decision and who is intended to benefit.</b>		To provide a new build 120 capacity special school for the pupils of Ysgol Heol Goffa on a new school site with 21 <sup>st</sup> Century facilities to meet the needs of children with more complex needs and profound special educational needs. The increase in capacity will benefit the special school by addressing the capacity issues experienced in recent years and will also ensure that the school can accommodate future demand. A 5 bed respite centre will also be located in the site of the new school and a small hydro pool facility.			
<b>The Public Sector Equality Duty requires the Council to have “due regard” to the need to:-</b>  (1) eliminate unlawful discrimination, harassment and victimisation;  (2) advance equality of opportunity between different groups; and  (3) foster good relations between different groups  (see guidance notes)		<b>2. What is the level of impact on each group/ protected characteristics in terms of the three aims of the duty?</b>  <b>Please indicate high (H) medium (M), low (L), no effect (N) for each.</b>	<b>3. Identify the risk or positive effect that could result for each of the group/protected characteristics?</b>		<b>4. If there is a disproportionately negative impact what mitigating factors have you considered?</b>  N/A
<b>Protected characteristics</b>	<b>Age</b>	M	Risk Neutral	The new school will cater for pupils aged 3-19	
	<b>Disability</b>	M	Risk Neutral	21 <sup>st</sup> Century Facilities for pupils with complex and profound special educational needs	
	<b>Gender reassignment</b>	N	Risk Neutral		
	<b>Race</b>	N	Risk Neutral		

<b>Religion/Belief</b>	N	Risk Neutral		
<b>Pregnancy and maternity</b>	N	Risk Neutral		
<b>Sexual Orientation</b>	N	Risk Neutral		
<b>Sex</b>	N	Risk Neutral		
<b>Welsh language</b>	M	Risk Neutral		
<b>Any other area</b>	N	Risk Neutral		

**5. Has there been any consultation/engagement with the appropriate protected characteristics?**

**YES**  Informal and formal consultation will be undertaken as stated in Welsh Government guidance. We will consult informally with the Headteacher and Chair of Governors. As part of the Formal Consultation period key stakeholders will be consulted with as detailed on page 8 of this consultation document.

**NO**

**6. What action(s) will you take to reduce any disproportionately negative impact, if any?** Ensure that parents, staff and governors are fully informed at each stage of the consultation.

### 7. Procurement

**Following collation of evidence for this assessment, are there any procurement implications to the activity, proposal, service.**

**Please take the findings of this assessment into your procurement plan. Contact the corporate procurement unit for further advice. N/A**

### 8. Human resources



<p><b>Following collation of evidence for this assessment, are there any Human resource implications to the activity, proposal or service?</b> As there will be an increase in capacity, additional staffing may be required. However, this will be addressed as the scheme progresses and Human Resources will be fully consulted.</p>		
<p><b>9. Based on the information in sections 2 and 6, should this function/policy/procedure/practice or a decision proceed to Detailed Impact Assessment?</b> (recommended if one or more H under section 2)</p>	<p>YES <input type="checkbox"/></p>	<p>NO <input checked="" type="checkbox"/></p>
<p><b>Approved by:</b> Head of Service</p>	<p><b>Simon Davies</b></p>	<p><b>Date: June 2020</b></p>

Thank you for completing this assessment.

For further information regarding Assessing Impact, please contact the -

Policy & Partnership Team

Chief Executive's Department

01267 22(4914) / (4676)

[equalities@carmarthenshire.gov.uk](mailto:equalities@carmarthenshire.gov.uk)

**Please send a copy of the assessment to the above e-mail address upon completion.**

LAST PAGE

Proposal to relocate Ysgol Heol Goffa to a new site and increase its capacity from 75 to 120

# Consultation Report



[carmarthenshire.gov.uk](http://carmarthenshire.gov.uk)

Cyngor **Sir Gâr**  
**Carmarthenshire**  
County Council



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## Executive Summary

### The Consultation Period

On the 21<sup>st</sup> September 2020 Carmarthenshire County Council published proposals to:

- Relocate Ysgol Heol Goffa to a new site and increase its capacity from 75 to 120.

The consultation period commenced on 21<sup>st</sup> September 2020 in line with the publication of the proposal and closed on 1<sup>st</sup> November 2020 with a total of 41 responses received (excluding the responses received from Estyn and the pupils' consultation) in response to the formal consultation.

Responses Received		
Online Survey	Email	Total
40	1	41

It must be noted that of the 41 observations received, all were received prior to the end of the consultation period.

### Consultation Event

Due to the ongoing implications of the Coronavirus issue we were advised to postpone all events where there was interaction between staff, parents and the wider community and as a result a drop in session to discuss proposals was cancelled.

In the absence of a drop in session stakeholders were offered an opportunity to discuss proposals with an Education Officer via a virtual meeting. No stakeholders requested a virtual meeting to discuss proposals.

### Responses Received

This proposal has been prepared due to Ysgol Heol Goffa being over-subscribed at present with 101 pupils on roll in January 2020, as a result the Local Authority are developing a scheme to provide the pupils of Ysgol Heol Goffa with a new condition A rated school building on a new site with facilities for the 21<sup>st</sup> Century.

### Supportive

- Theme 1 – No reason
- Theme 2 – Support for proposal
- Theme 3 – Capacity
- Theme 4 – 21<sup>st</sup> Century School Design
- Theme 5 – Existing School Site

### Concerns

- Theme 1 – No reason
- Theme 2 – 21<sup>st</sup> Century School Design
- Theme 3 – Existing School Site

Of the 41 respondents, they are categorised as follows:

- Parent (5)
- Staff Member (5)
- School Governor (6)
- Other (25)

## Overall Summary

Supportive	93%	Not supportive	7%
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## Workshops

Following the closure of the consultation period on the 1st November 2020 a workshop was held to analyse the observations received.

## Next Steps

The Consultation Report will be presented to the Education & Children's Scrutiny Committee for comments and a recommendation and then ultimately to the Executive Board for determination on whether or not to proceed with the proposal and publish a statutory notice. Should the Executive Board decide to proceed to the next stage, a Statutory Notice will be published during the Spring Term 2021.

## Summary of Observations received and Local Authority Responses

Point Number	Point Raised	Local Authority Response	Number of responses raising this point	% of responses raising this point
<b>Supportive Comments Raised</b>				
1.	<b>No reason</b> Some respondents did not provide a reason for their support.		22	54%
2.	<b>Support for proposal</b> Respondents supported the proposal to increase capacity to 120 places providing a new school build with 21 <sup>st</sup> Century facilities providing enhanced ALN opportunities with community facilities.	The Local Authority notes that due to an increase in demand for places a new school with 21 <sup>st</sup> Century facilities is needed.  The support was noted.	12	29%
3.	<b>Capacity</b> Respondents questioned whether 120 places would be sufficient to meet future demand for places.	Specialist setting capacity across the Local Authority is being considered, as a result it is likely that increased capacity will be required in a number of settings according to projected need. It is not our intention to increase the Heol Goffa capacity any further as we feel that 120	2	5%

Point Number	Point Raised	Local Authority Response	Number of responses raising this point	% of responses raising this point
		places is sufficient and will provide a percentage of the SLD capacity required.		
4.	<b>21<sup>st</sup> Century School Design</b> Respondents noted the need for adequate drop off and pick up areas to be included in the scheme design. It was also noted that future expansion opportunities should be built into the scheme design.	School design are considered and developed by the design teams in consultation with the school and Governing Body representatives. Internal and external areas provided are being developed according to national guidelines Building Bulletin 104 for the design of special schools.	2	5%
5.	<b>Existing School Site</b> Respondents questioned the Authorities aspirations for the existing school site.	The Authority is undertaking of a full-scale review of the Modernising Education Programme over the coming months and this will include all of the county's schools including the current site of Ysgol Heol Goffa.	2	5%
<b>Concerns Raised</b>				
1.	<b>No reason</b> Some respondents did not provide a reason for their concerns.		1	2%
2.	<b>21<sup>st</sup> Century School Design</b>		1	2%



<b>Point Number</b>	<b>Point Raised</b>	<b>Local Authority Response</b>	<b>Number of responses raising this point</b>	<b>% of responses raising this point</b>
	Concerns were raised regarding internal areas within the new school design.	School design are considered and developed by the design teams in consultation with the school and Governing Body representatives. Internal and external areas provided are being developed according to national guidelines Building Bulletin 104 for the design of special schools.		
<b>3.</b>	<b>Existing School Site</b> Respondent questioned the need for building on a new site.	The existing school site is not sufficient to build and accommodate a 120 capacity special school with 21 <sup>st</sup> Century facilities. It would not offer value for money to operate 2 sites therefore a new preferred site has been identified next to the recently completed Ysgol Pen Rhos.	<b>1</b>	<b>2%</b>

## **Estyn's Observations regarding the Proposal**

### **Estyn's response to the proposal to relocate Ysgol Heol Goffa to a new site and increase its capacity from 75 to 120.**

This report has been prepared by Her Majesty's Inspectors of Education and Training in Wales.

Under the terms of the School Standards and Organisation (Wales) Act 2013 and its associated Code, proposers are required to send consultation documents to Estyn. However, Estyn is not a body which is required to act in accordance with the Code and the Act places no statutory requirements on Estyn in respect of school organisation matters. Therefore, as a body being consulted, Estyn will provide their opinion only on the overall merits of school organisation proposals.

Estyn has considered the educational aspects of the proposal and has produced the following response to the information provided by the proposer and other additional information such as data from Welsh Government and the views of the Regional Consortia, which deliver school improvement services to the schools within the proposal.

#### **Introduction**

The proposal is by Carmarthenshire County Council.

The proposal is to relocate Ysgol Heol Goffa to a new site and increase its capacity from 75 to 120

#### **Summary / Conclusion**

The proposer has clearly outlined the benefits of the proposal in addressing the issue of an increased demand for provision and by improving facilities for pupils in a new build school.

It is Estyn's opinion that the proposal is likely to at least maintain or improve the current standards of education and provision for pupils in the area.

#### **Description and benefits**

The proposer has provided a clear rationale for the proposal. It is to increase the capacity of the school to deal with a growing demand for places and to improve facilities and provision for pupils by providing a new building with 21st century facilities. The proposer has made suitable provision for people to respond to the proposal due to Coronavirus including the provision of virtual drop in sessions if requested. The proposer has appropriately considered the relative advantages and disadvantages of the proposal as well as the risks and provided suitable counter measures.

The data shows that the school is currently over-subscribed and that this has been the trend for the last four years. The catchment area for the school covers the whole of Carmarthenshire. The proposer has suitably shown that the proposal to increase the capacity would mitigate the risk of possibly having to send pupils out of catchment to receive the provision they require due to lack of capacity at the current site. The proposer has appropriately shown that it has considered other alternatives to this current proposal including maintaining the status quo and refurbishing the existing site. It has clearly explained that the restrictions on the current site would not enable the proposer to increase the capacity of the school.

The proposer has suitably considered the impact of the proposal on learner travel arrangement due to the new site being 3.8 miles away from the current site. The proposer states that 'transport will be provided in accordance with the requirements of a Statement of Special Educational Needs issued by the Authority or where a pupil/learner is the subject of the statutory assessment procedure where they have learning difficulties which the Local Authority considers makes transport 'necessary''.

The proposer has completed an appropriate community impact assessment that clearly demonstrates the benefits of the new school site to the community in the ward. These include shared access to a 3G pitch with Ysgol Pen Rhos and community use of the specialist facilities outside of school hours.

The proposer has completed a suitable fairness and equalities impact assessment that clearly considers the impact of the proposals on pupils demonstrating the protected characteristics. This assessment also considers the impact of the proposals on the Welsh language. It recognises that bilingual provision in the authority's special schools and units is limited and that it will work with these settings, including Ysgol Heol Goffa, to develop a bilingual provision. However, it does not provide any details on how it proposes to do this.

### **Educational aspects of the proposal**

The proposer clearly explains that it is not appropriate to compare the standards that pupils achieve with national averages or to analyse trends over time because of the wide range of pupil's special educational needs. The proposer has provided appropriate data on the school's current performance such as comparing performance of groups of pupils and states that all school leavers gain one or more qualifications that are well matched to their individual needs and abilities. The proposer does not give an evaluation of pupil progress over time. The proposer provides a clear evaluation of how it views the school's provision and leadership and management to be highly effective. The proposer believes that the proposal

will provide a high-quality learning environment for pupils that will maintain the current excellent standards and improve experiences for pupils. The proposer has suitably demonstrated that it is minimising the disruption to learners by keeping them at the existing school site until the new school building is ready.

The school has been categorised as green that indicates that the school is highly effective and knows what it is doing well and what it needs to improve.

The proposer has also appropriately considered the most recent Estyn inspection (2017) outcomes for Ysgol Heol Goffa where the school was judged as excellent for its current performance and excellent for its prospects for improvement. It demonstrates how the proposal will address shortcomings identified in the Estyn report around the learning environment. These include providing additional space and better provision for teaching post 16 pupils with life skills and vocational skills and by the inclusion of an on-site hydrotherapy pool.

## Local Authority Response to Estyn's Observations

As can be seen from Estyn's observations they are of the opinion that the proposal is at least likely to maintain or improve the current standards of education. Their observations include supporting statements as noted below.

### Statements of support for this proposal by Estyn

The proposer has clearly outlined the benefits of the proposal in addressing the issue of an increased demand for provision and by improving facilities for pupils in a new build school.

It is Estyn's opinion that the proposal is likely to at least maintain or improve the current standards of education and provision for pupils in the area.

The proposer has provided a clear rationale for the proposal. It is to increase the capacity of the school to deal with a growing demand for places and to improve facilities and provision for pupils by providing a new building with 21st century facilities. The proposer has made suitable provision for people to respond to the proposal due to Coronavirus including the provision of virtual drop in sessions if requested. The proposer has appropriately considered the relative advantages and disadvantages of the proposal as well as the risks and provided suitable counter measures.

The proposer has suitably shown that the proposal to increase the capacity would mitigate the risk of possibly having to send pupils out of catchment to receive the provision they require due to lack of capacity at the current site.

The proposer has appropriately shown that it has considered other alternatives to this current proposal including maintaining the status quo and refurbishing the existing site. It has clearly explained that the restrictions on the current site would not enable the proposer to increase the capacity of the school.

The proposer clearly explains that it is not appropriate to compare the standards that pupils achieve with national averages or to analyse trends over time because of the wide range of pupil's special educational needs. The proposer has provided appropriate data on the school's current performance such as comparing performance of groups of pupils and states that all school leavers gain one or more qualifications that are well matched to their individual needs and abilities.

## Consultation with the Pupils

**School:** Ysgol Heol Goffa

**Date:** 13<sup>th</sup> October 2020

**Consultation undertaken by:** Karen Draper – Educational Support Adviser

**Interviewed:** Members of the school council (conducted on-line due to coronavirus)

### **What do the pupils think about having a new school with capacity for more pupils?**

Pupils are happy, excited, but also a little nervous. Some children are a little worried because they don't like change and some of the secondary aged pupils are sad at not being able to attend the new school.

Pupils are excited about the ski slope, Enterprise, the studio, the hydro pool, and the basket-ball hoops. But they also feel happy because there will be space for everyone, including their teachers.

They are also hoping to have:

A mud kitchen, a stage to perform on, sandpit, lots of outdoor spaces, quiet areas with blankets, picnic areas, trees, a rabbit, an obstacle course, trampoline, dens, swings, a climbing wall and a DIY workstation.

### **How will a hydro pool in school help them?**

It is very important because pupils need to stretch their bodies, they won't need to travel so far, so will be in the pool for longer and more often and it helps with people's legs.

### **Is there anything they are unsure about?**

The pupils were concerned that there was only one staffroom but were happy when they knew staff also had an outdoor space.

When looking at the plans they felt the pool looked quite small but were happy when they knew this was just for their use.

There was a question around the use of the pool by all pupils. It was explained by the current HT that pupils who have physical plans would be in there first.

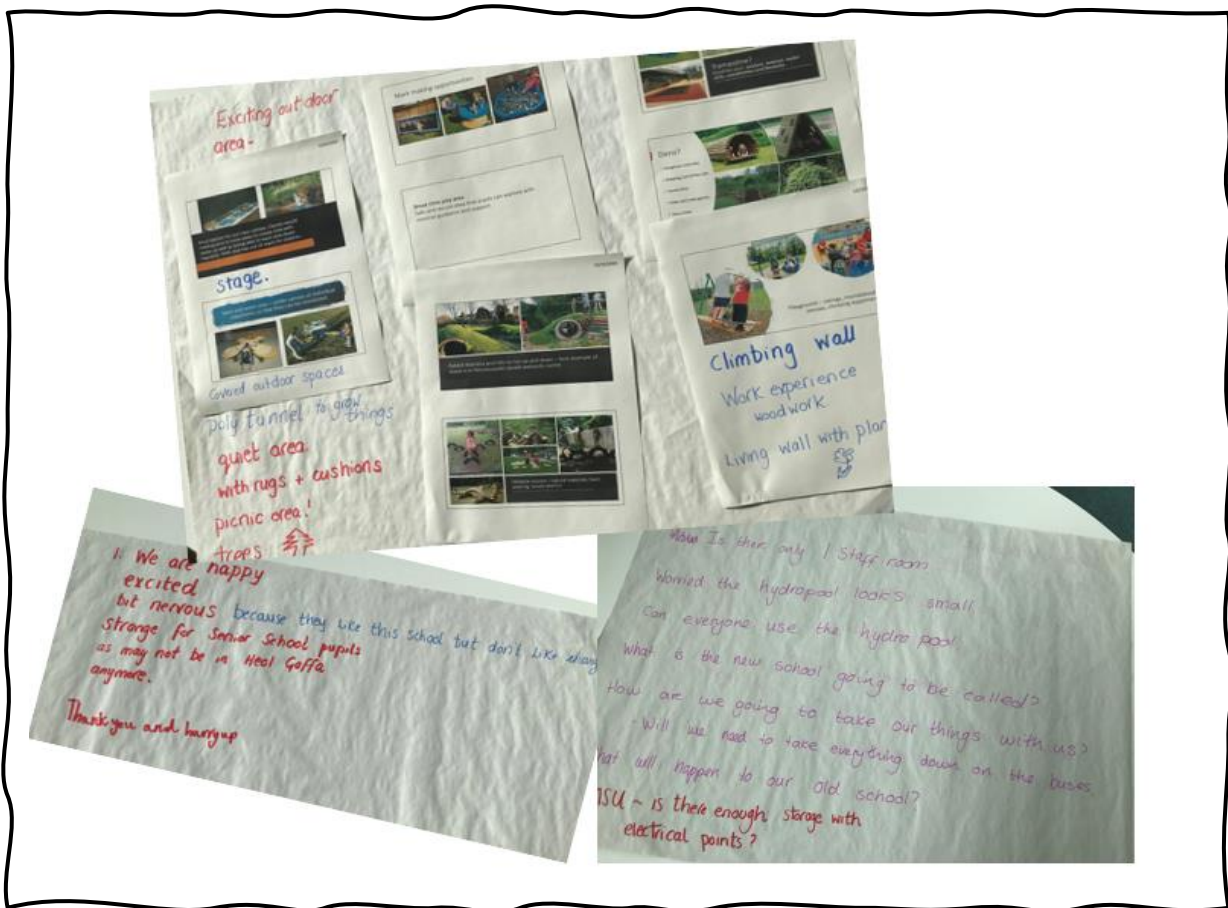
There was a question around the name of the new school-the current HT told the pupils that she had an idea, but it might be that LA officers would name it. The pupils were definite that they wanted to be part of the voting.

They also asked questions around transporting equipment down to the new school.

**What would they like to say to the people who have helped this happen?**

The pupils and staff want to say a huge thank you, but also a..." please hurry up."

All pupils were in agreement that the proposal should go through.



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## EXECUTIVE BOARD

21<sup>ST</sup> DECEMBER 2020

### MODERNISING EDUCATION PROGRAMME

### PROPOSAL TO REVIEW PRIMARY EDUCATION PROVISION IN THE MYNYDDYGARREG AND GWENLLIAN AREAS

#### Recommendations/key decisions required:

It is recommended that the Executive Board approves:

1. The proposal as outlined below and in the attached consultation document;
2. Officers to initiate formal consultation on the proposal;
3. That a report is submitted to the Executive Board at the end of the consultation period.

#### Reasons:

To comply with statutory procedures and guidance in relation to school re-organisation.

**Relevant Scrutiny Committee Consulted** YES – 23/11/2020

The Education and Children Scrutiny Committee resolved:

1. that the proposal to review primary education provision in the Mynyddygarreg and Gwenllian areas, as detailed in the report, be endorsed;
2. that it be recommended to the Executive Board that a formal consultation process be initiated.

**Council Decision Required** NO

#### EXECUTIVE BOARD MEMBER PORTFOLIO HOLDER:

Cllr. Glynog Davies (Education & Children)

<p><b>Directorate:</b> Education &amp; Children</p> <p><b>Name of Head of Service:</b> Simon Davies</p> <p><b>Report Author:</b> Sara Griffiths</p>	<p><b>Designations:</b></p> <p>Head of Access to Education</p> <p>Modernisation Team Manager</p>	<p><b>Tel Nos./E-mail Addresses:</b></p> <p>01267 246471 <a href="mailto:SiDavies@carmarthenshire.gov.uk">SiDavies@carmarthenshire.gov.uk</a></p> <p>01267 226618 <a href="mailto:SMGriffiths@carmarthenshire.gov.uk">SMGriffiths@carmarthenshire.gov.uk</a></p>
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# EXECUTIVE SUMMARY

EXECUTIVE BOARD  
21<sup>ST</sup> DECEMBER 2020

## MODERNISING EDUCATION PROGRAMME

### PROPOSAL TO REVIEW PRIMARY EDUCATION PROVISION IN THE MYNYDDYGARREG AND GWENLLIAN AREAS

#### Background

The Authority has a legal responsibility to review the number and type of schools it has in an area and whether it is making the best use of resources and facilities to deliver the opportunities that children deserve.

#### Ysgol Gynradd Mynyddygarreg

Ysgol Gynradd Mynyddygarreg is a Welsh medium community primary school located in the village of Mynyddygarreg with capacity for 55 pupils between 4-11 years. In recent years pupil numbers have remained consistent but are still well below capacity. January 2020 PLASC showed that there were 36 pupils at the school with 19 surplus places, or 35%. Welsh Government through the School Organisation Code advises local authorities to review their provision where there are more than 10% surplus places in an area.

Whilst there are 113 pupils living within Ysgol Gynradd Mynyddygarreg's catchment area **only 22 of those pupils attend the school**, meaning that 91 pupils living within the school's catchment area attend 16 other schools within the County, many being neighbouring catchment schools.

Based on current projections (2020) it is estimated that pupil figures will remain well below capacity for the foreseeable future. Additionally, Ysgol Gynradd Mynyddygarreg's building condition is 'poor' and the school has been in deficit since 2016/17 and remains with a deficit of £48,265 going into the 2020/21 financial year. Their original funding allocation for 2020/21 was £172k.

From an educational perspective having such a small number of pupils and mixed age classes makes it extremely difficult for the school to deliver the breadth and depth of curricular and social experiences which pupils of this age require to fully develop.

The culmination of these unavoidable facts presents a school model which does not represent a sound, stable educational model for best use of resources. With no prospect of there being a significant increase in pupil numbers for the foreseeable future, consideration is required on the sustainability of the school.

## Ysgol Gymraeg Gwenllian

Ysgol Gymraeg Gwenllian is a Welsh medium 3-11 community primary school situated in the historical town of Kidwelly.

In recent years, pupil numbers have remained consistent and slightly below the school's capacity of 140. However, based on current pupil projections (2020), pupil numbers are expected to increase the school is expected to be close to capacity by 2025 and this trend is likely to continue for the foreseeable future. As a result, the Local Authority are developing a scheme to provide a new school with facilities fit for the 21<sup>st</sup> Century on a new site.

The project will re-locate Ysgol Gymraeg Gwenllian from its current site to a new site which is within the current catchment area of Ysgol Gymraeg Gwenllian. The new school will provide a Welsh Government standard primary school building with capacity to accommodate 240 pupils (210 + 30 nursery places) between the ages of 3-11 years old and ensure that the school is able to deliver the full curriculum in a modern, safe and inspiring learning environment with enhanced outside areas.

This proposed investment will address poor building condition and lack of adequate space and provision in the existing school by providing a category **A** school with sufficient places for current and projected demand.

As a result of the ongoing challenges that both schools face, it is not possible to sustain current arrangements.

### The Proposal

- Discontinue Ysgol Gynradd Mynyddygarreg as from 31<sup>st</sup> August, 2021.
- From 1<sup>st</sup> September, 2021 all pupils will be registered at Ysgol Gymraeg Gwenllian operating on both sites (Ysgol Gymraeg Gwenllian and the former Ysgol Gynradd Mynyddygarreg) increasing its capacity to 178 + 17 nursery places.
- Re-designate Ysgol Gymraeg Gwenllian's catchment area to include that of the former Ysgol Gynradd Mynyddygarreg's catchment area as of 1<sup>st</sup> September, 2021.
- Relocate Ysgol Gymraeg Gwenllian to a new site and increase its capacity to 210 + 30 nursery places as of September 2023, when occupation of the new school is proposed.

### Recommendation

It is recommended that the Executive Board approves to proceed with the proposal as outlined above and a formal consultation be initiated.

**DETAILED REPORT ATTACHED?**

**YES: Draft Consultation Document**

# IMPLICATIONS

I confirm that other than those implications which have been agreed with the appropriate Directors / Heads of Service and are referred to in detail below, there are no other implications associated with this report:

Signed:  Head of Access to Education

Policy, Crime & Disorder and Equalities	Legal	Finance	ICT	Risk Management Issues	Staffing Implications	Physical Assets
<b>YES</b>	<b>YES</b>	<b>YES</b>	<b>YES</b>	<b>YES</b>	<b>YES</b>	<b>YES</b>

**1. Policy, Crime & Disorder and Equalities**

Developments are consistent with the Authority's Corporate Strategy and the Modernising Education Strategic Outline Programme.

**2. Legal**

Appropriate consultation will need to be initiated in accordance with the relevant statutory procedures.

**3. Finance**

Revenue implications will be catered for within the Local Management of Schools Fair Funding Scheme.

**4. ICT**

ICT colleagues will be consulted with in relation to the potential relocation of IT equipment.

**5. Risk Management Issues**

Continuing with current provision would see current problems being perpetuated with the education of children in the area being placed at unacceptable risk and the County Council failing to meet WG target that all buildings should be of an appropriate standard.

**6. Staffing Implications**

Staffing implications will be addressed in accordance with the County Council's Policy and Procedures.

## 7. Physical Assets

- i. One redundant school site – Ysgol Gynradd Mynyddygarreg. Should the proposal be adopted the property will be transferred to Corporate Property Division of the Regeneration and Policy Department for the procedures outlined in the ‘Future Use/Disposal of Redundant Land and Buildings’ arising from the Modernising Education Programme policy to be actioned.  
This policy has been developed to allow the community to be offered the asset in the first instance before placing the site on the open market.
- ii. If the proposal is implemented to discontinue Ysgol Gynradd Mynyddygarreg, Ysgol Gymraeg Gwenllian will proceed to operate on split sites occupying both current Ysgol Gynradd Mynyddygarreg and Ysgol Gymraeg Gwenllian locations until the proposed new Ysgol Gymraeg Gwenllian school building is ready for occupation.
- iii. Following the project completion of developing a new school building for Ysgol Gymraeg Gwenllian the current Ysgol Gymraeg Gwenllian will become redundant as point i. above.

## CONSULTATIONS

I confirm that the appropriate consultations have taken in place and the outcomes are as detailed below:

Signed:  Head of Access to Education

1. **Scrutiny Committee** – Consulted on 23/11/2020.
2. **Local Member(s)** - The local members will be notified of the proposal and will be consulted during the formal consultation period.
3. **Community / Town Council** - Will be consulted during the formal consultation period.
4. **Relevant Partners** - Will be consulted during the formal consultation period.
5. **Staff Side Representatives and other Organisations** - Will be consulted during the formal consultation period.

<b>EXECUTIVE BOARD PORTFOLIO HOLDER AWARE/CONSULTED</b>	YES
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### Section 100D Local Government Act, 1972 – Access to Information List of Background Papers used in the preparation of this report:

Title of Document	File Ref No./Locations that the papers are available for inspection
Stage 1 (Permission to Consult) – ECS Scrutiny Committee Report	<a href="https://gov.wales">Education &amp; Children Scrutiny Committee on Monday, 23rd November, 2020, 10.00 am (gov.wales)</a>
Carmarthenshire's Welsh in Education Strategic Plan	<a href="https://www.carmarthenshire.gov.wales/home/council-democracy/strategies-and-plans/welsh-in-education-strategic-plan/">https://www.carmarthenshire.gov.wales/home/council-democracy/strategies-and-plans/welsh-in-education-strategic-plan/</a>
MEP Biennial Review	<a href="http://www.carmarthenshire.gov.uk">www.carmarthenshire.gov.uk</a> Executive Board 20 <sup>th</sup> June 2016
21 <sup>st</sup> Century Schools Website	<a href="http://www.21stcenturyschools.org">www.21stcenturyschools.org</a>
School Organisation Code 2018	<a href="https://www.carmarthenshire.gov.uk/school-organisation-code-2018">School Organisation Code 2018</a>

# Proposal to review Primary Education Provision in the Mynyddygarreg and Gwenllian areas

## Consultation Document

**DRAFT**

[carmarthenshire.gov.uk](http://carmarthenshire.gov.uk)

Cyngor **Sir Gâr**  
**Carmarthenshire**  
County Council



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## **School Modernisation Section**

**Sara Griffiths**, Modernisation Team Manager

If you require this information in large print, Braille or on audiotape please contact the Department for Education & Children

**Email:** [DECMEP@carmarthenshire.gov.uk](mailto:DECMEP@carmarthenshire.gov.uk)

**Telephone:** 01267 246618



## Foreword

As part of its statutory obligation to keep the number and type of school places under review, the County Council has adopted a wide-ranging programme designed to improve school buildings and enhance opportunities for learning. The strategy reflects the vision and policies established by the County Council which embrace the requirement to deliver services, to clear standards – covering both cost and quality – by the most economic and effective means. In our drive to continually improve on the services made available to all learners, we must maximise the finite resources available to the Council, and continue to work in partnership with all those who have a contribution to make to the process of learning and the wellbeing of both children and their families. Schools of the future will need to serve as a focus for a wide range of services dedicated to serving the needs of the community through a joined up approach.

Carmarthenshire is blessed with many very able education leaders and teachers but the continuing changes to the curriculum places a heavy demand on their skills to meet the wide-ranging demands of all children. Although the processes of learning, and skills of teaching, are extremely important, deep subject knowledge on the part of the teacher is essential if learners with their various gifts in different areas are to discover and develop their talents to the full.

Schools designed to meet current demands are expected to provide a broad and balanced curriculum through high quality and inspirational teaching. In the planning of new provision it will be important to ensure that our schools are properly equipped to enhance opportunities for social inclusion, sustainable development, equal opportunities and bilingualism. In practical terms we need to ensure that provision reflects the changing patterns of population, with schools based in the right location with accommodation and facilities fit to serve the needs of all learners in the twenty first century.

Consultation will follow the guidelines established by the Welsh Government and will involve identified interested parties. The information set out in this document is intended to clarify the proposals for your school and support the consultation process.



**Gareth Morgans**

Director of Education and Children

## Glossary of Abbreviations

<b>ALN</b>	Additional Learning Needs
<b>AN</b>	Admission Number
<b>CCC</b>	Carmarthenshire County Council
<b>CP</b>	Community Primary
<b>DS</b>	Dual Stream
<b>EM</b>	English medium
<b>Estyn</b>	Her Majesty's Inspectorate for Education and Training in Wales
<b>FTE</b>	Full Time Equivalent
<b>LA</b>	Local Authority
<b>MCSW</b>	Measuring the Capacity of Schools in Wales
<b>MEP</b>	Modernising Education Programme
<b>NOR</b>	Number on Roll
<b>PLASC</b>	Pupil Level Annual School Census Data
<b>PT</b>	Part-Time
<b>WESP</b>	Welsh in Education Strategic Plan
<b>WG</b>	Welsh Government
<b>WM</b>	Welsh Medium

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## Introduction

Carmarthenshire County Council has a legal responsibility to review the number and type of schools it maintains in the area and whether or not it is making the best use of the resources and facilities to deliver the opportunities that children deserve.

As part of this process the Council has published its vision on how it sees the future for all of the primary and secondary schools in the County and this includes consulting on the future shape of education in the Mynyddygarreg and Gwenllian areas.

This consultation document outlines current provision and options to determine the optimum solution for meeting future need.

## Schools subject to proposals

		<b>Ysgol Gymraeg Gwenllian</b>	<b>Ysgol Gynradd Mynyddygarreg</b>
<b>School Location</b>		SA17 4UT	SA17 4RL
<b>Age Range</b>		3-11	4-11
<b>School Category</b> (Community [C], Voluntary Aided [VA], Voluntary Controlled [VC])		Community	Community
<b>Language Category</b>		Welsh Medium	Welsh Medium
<b>Number of registered Pupils (January 2020)</b>	<b>Nursery Age</b>	19	1
	<b>Reception – Y.6</b>	100	35
	<b>Total</b>	119	35
<b>Number of pupils previously on the register</b>	<b>January 2019</b>	117	35
	<b>January 2018</b>	120	32
	<b>January 2017</b>	129	29
	<b>January 2016</b>	136	33
<b>Pupil Projections</b>	<b>January 2021</b>	125	38
	<b>January 2022</b>	130	42
	<b>January 2023</b>	131	40
	<b>January 2024</b>	133	37
	<b>January 2025</b>	135	39
<b>Capacity (including nursery age)</b>		140	55
<b>Cost per pupil (2020/21)</b>		£3,611	£4,768
<b>School Budget (2020/21)</b>		£412k	£172k
<b>Estyn Inspection Result</b>		<a href="#">Estyn</a>	<a href="#">Estyn</a>
<b>Building Condition Category</b>		B	C

## Background

### Ysgol Gynradd Mynyddygarreg

Ysgol Gynradd Mynyddygarreg is situated in the village of Mynyddygarreg near Kidwelly in Carmarthenshire. It serves the village and the surrounding rural area. The school provides education to pupils between the ages of 4-11 years old.

In recent years, pupil numbers have remained fairly consistent but have been below the school's capacity. Pupils are taught in two mixed age classes each spanning four year groups. January 2020 PLASC showed that there were 36 pupils at the school and 19 surplus places.

Whilst there are 113 pupils living within Ysgol Gynradd Mynyddygarreg's catchment area **only 22 of those pupils attend the school**, meaning that 91 pupils living within the school's catchment area attend other schools.

Based on current pupil projections it is estimated that the pupil figures will remain well below capacity for the foreseeable future.

Ysgol Gynradd Mynyddygarreg's building condition is poor. To modernise the building and provide the facilities which the Council would wish to provide, would be considerable and could not be justified having regard to the low and declining pupil numbers.

The school's most recent Estyn inspection completed in June 2014 judged the school's current performance to be 'adequate' and prospects for improvement as 'good'.

Additionally, having such low pupil numbers at a school impacts on school budget allocation. The school has been in deficit since the end of the 2016/17 financial year and has carried a deficit of £48,265 into the 2020/21 financial year.

### Ysgol Gymraeg Gwenllian

Ysgol Gymraeg Gwenllian is situated in the historical town of Kidwelly in Carmarthenshire. The school serves the town itself and the surrounding rural area. The school provides education to pupils between the ages of 3-11 years old.

In recent years, pupil numbers have remained fairly consistent but have been below the school's capacity. Pupils are currently taught in five classes – Nursery/Reception class, Year 1/ 2 class, Year 3 class, Year 4 class and a Year 5/6 class. January 2020 PLASC showed that there were 119 pupils at the school and 21 surplus places.

Whilst there are 262 pupils living within Ysgol Gymraeg Gwenllian's catchment area **only 70 of those pupils attend the school**, meaning that 192 pupils living within the school's catchment area attend other schools.

The school's most recent Estyn inspection completed in April 2014 judged the school's current performance and prospects for improvement to be 'adequate'.

Despite the pupil numbers at the school declining slightly over the past three years, the school has a surplus budget of -£1,908 for the 2020/21 financial year.

Ysgol Gymraeg Gwenllian's current building condition is poor. To modernise the building and provide the facilities which the Council would wish to provide, would be considerable and could not be justified.

Based on current pupil projections it is estimated that the pupil figures will increase over the next few years and are expected to be close to capacity by 2025. This trend is likely to continue for the foreseeable future and as a result the Local Authority are developing a scheme to increase the capacity of Ysgol Gymraeg Gwenllian to 240 (210 + 30 nursery places) by providing a new school with facilities fit for the 21<sup>st</sup> Century on a new site.

The project will re-locate Ysgol Gymraeg Gwenllian from its current site to a new site which is within the current catchment area of Ysgol Gymraeg Gwenllian. The new school will provide a Welsh Government standard primary school building with capacity to accommodate 240 (210 + 30 nursery pupils) between the ages of 3-11 years old and ensure that the school is able to deliver the full curriculum in modern, safe and inspiring learning environments with enhanced outside areas.

This proposed investment will address poor building condition and lack of adequate space and provision in the existing school by providing a category **A** school with sufficient places for current and projected demand.

The last Estyn inspection completed in April 2014 noted that the school currently utilised local facilities for their sporting activities. The new school building will have its own MUGA (Multi Use Games Area) as well as a sport pitch built into the new school design.

## **Rationale for Change**

### **Ysgol Gynradd Mynyddygarreg**

Ysgol Gynradd Mynyddygarreg has experienced fairly consistent pupil numbers over the last five years. Pupil numbers have gradually increased from 33 in January 2016 to 36 in January 2020. However, current surplus at the school (January 2020) is 35% or 19 places.

As stated in the School Organisation Code (2018) document published by Welsh Government;

Where there are more than 10% surplus places in an area overall, local authorities **should** review their provision and **should** consider whether to make proposals for their removal if this will improve the effectiveness and efficiency of provision. A significant level of surplus provision is defined as 25% or more of a school's capacity (as defined in circular 21/2011) and at least 30 unfilled places.

If this proposal is implemented it will have a significant positive impact on surplus places in the area.

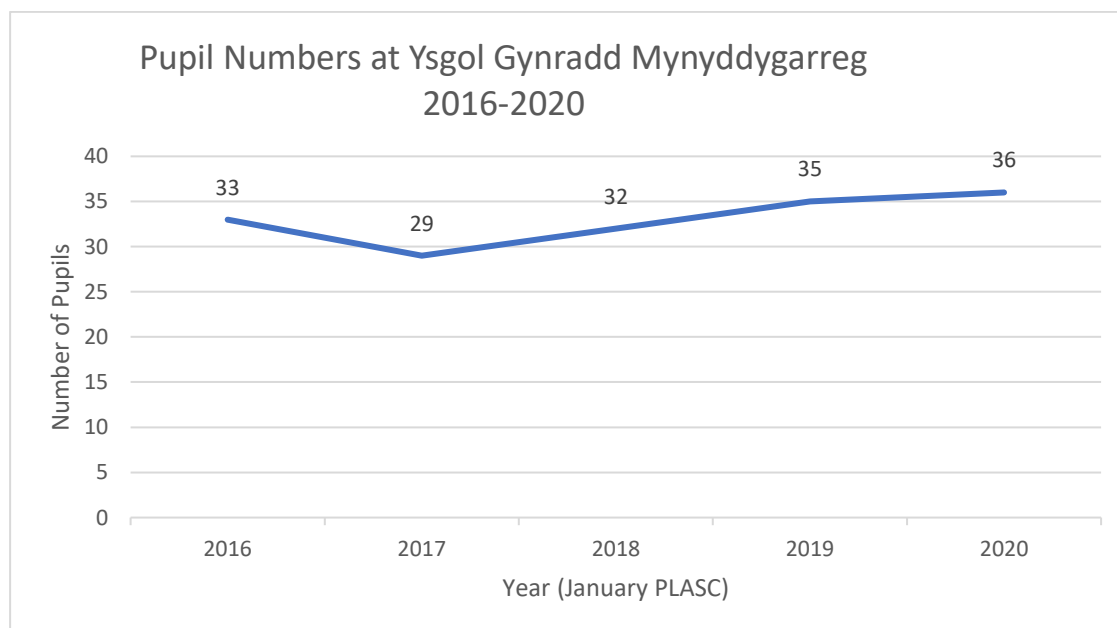
Having such low pupil numbers at a school impacts on school budget allocation. Ysgol Gynradd Mynyddygarreg is funded in accordance with the County Council's funding formula. Under the School Funding (Wales) Regulations 2010, the Individual Schools Budget must be allocated amongst schools maintained by the authority in the form of budget shares, using a locally determined funding formula. The regulations require that 70% of the funding is to be distributed on the basis of pupil numbers. The current funding formula supports such schools (pupils of less than 40) in providing additional funding through the small school supplement. The school also receives additional weighted grant support due to the low pupil numbers.

The school has been in deficit since the end of the 2016/17 financial year and remains with a deficit of £48,265 for 2020/21.

The deficit budget, low pupil numbers and budget cuts has placed the school in an extremely difficult financial position.

Low pupil numbers and a high percentage of surplus places has been a challenge for Ysgol Gynradd Mynyddygarreg in the last five years.

The graph below shows pupil numbers at the school over the last five years.

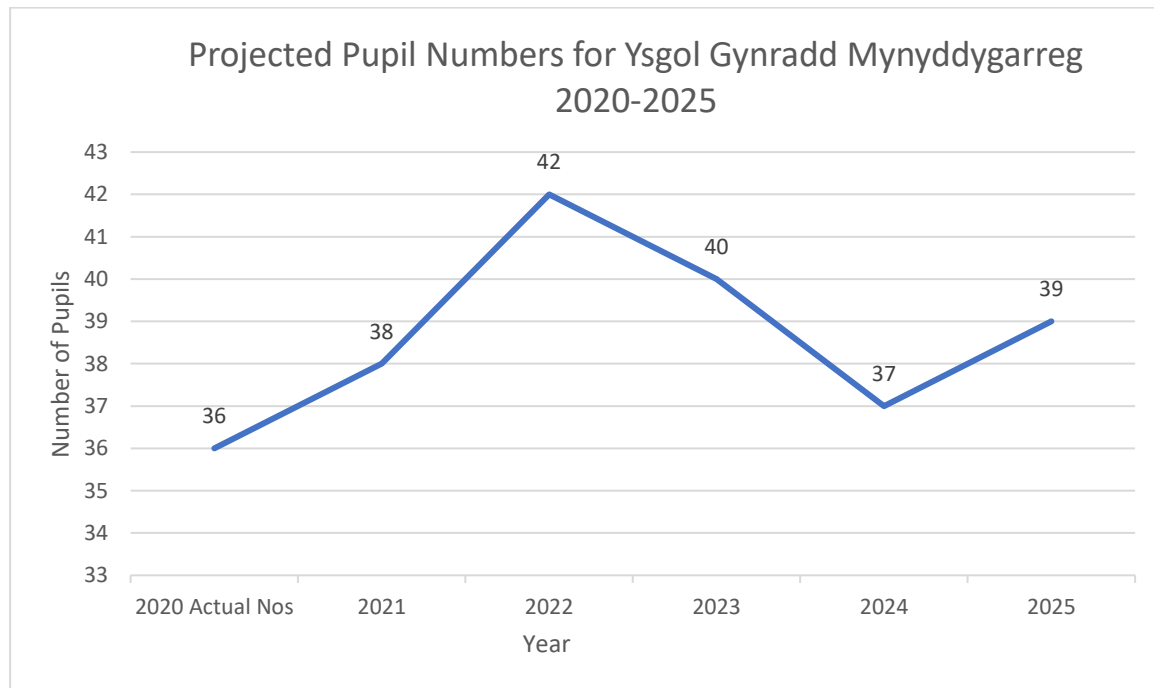


## Capacity Information

Historical surplus places for Ysgol Gynradd Mynyddygarreg are shown in the following table:

	Jan 16	Jan 17	Jan 18	Jan 19	Jan 20
<b>Ysgol Gynradd Mynyddygarreg</b>	55	55	55	55	55
Total Capacity					
Pupil Numbers	33	29	32	35	36
Surplus	22	26	23	20	19
% Surplus	40%	47%	42%	36%	35%

As can be seen from the table, Ysgol Gynradd Mynyddygarreg has experienced a significant % surplus in the last five years. Ysgol Gynradd Mynyddygarreg's % surplus in the last five years has exceeded 25% surplus places which the Welsh Government considers to be 'significant'. Welsh Government advises local authorities to review their provision where there are more than 10% surplus places in an area overall. Projections do show that numbers are expected to increase gradually. However, even at a projected peak of 42 pupils in 2022 the school will still have 13 surplus places (23% surplus).



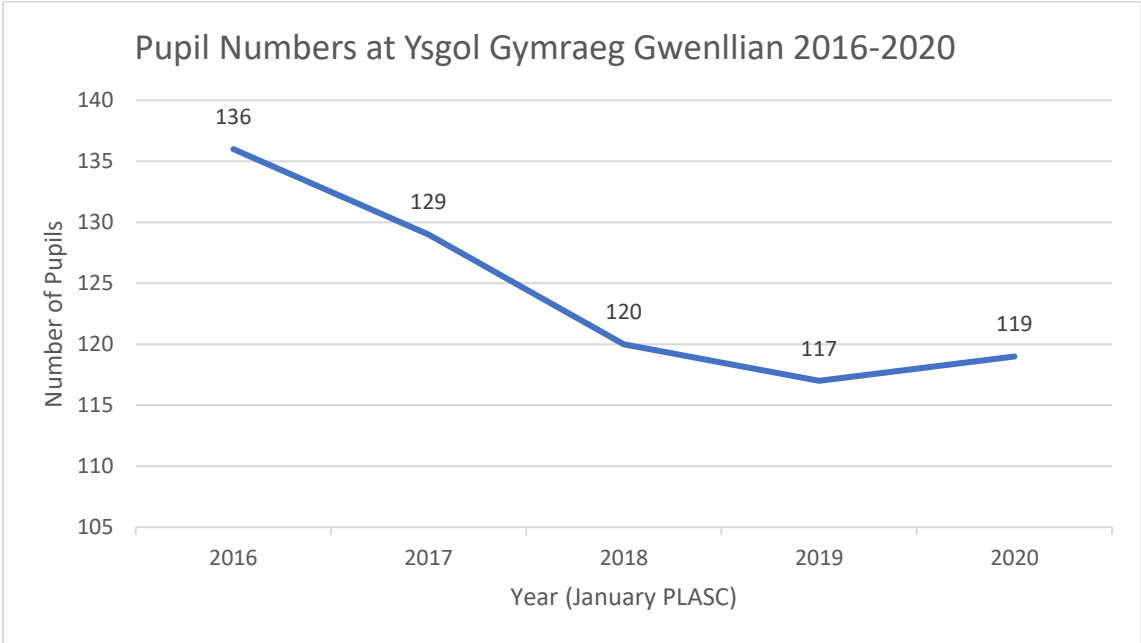


# Ysgol Gymraeg Gwenllian

The Local Authority has a vision for a bilingual Carmarthenshire and a commitment in providing category A schools with sufficient places for current and projected demand with facilities fit for the 21<sup>st</sup> Century.

Ysgol Gymraeg Gwenllian pupil numbers have declined during 4 of the last five years but there has been an increase in demand for Welsh language education and this trend is likely to continue for the foreseeable future. As a result, the Local Authority are developing a scheme to increase the capacity of Ysgol Gymraeg Gwenllian to 240 (210 + 30 nursery places) by providing a new school with facilities fit for the 21<sup>st</sup> Century on a new site to replace the current condition B building. The proposed investment will address poor building condition and the lack of adequate space in the current school by providing a new school on a new site with 21<sup>st</sup> Century facilities.

The graph below shows pupil numbers at the school over the last five years.



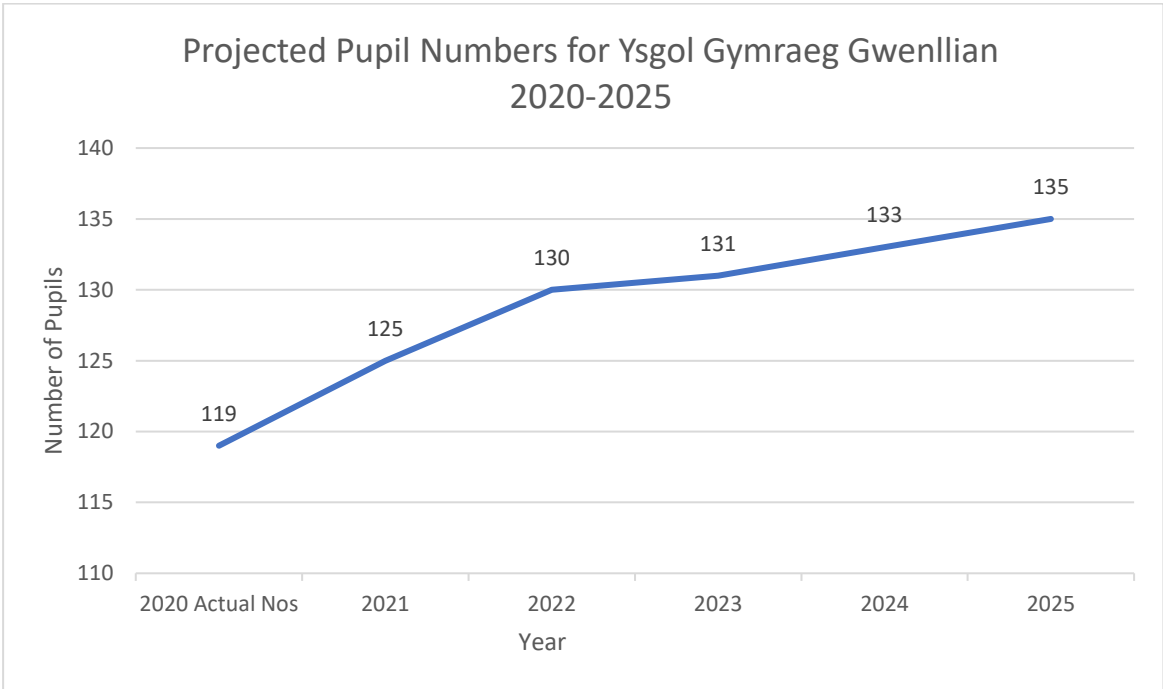
As can be seen from the graph above, there has been a steady drop in the number of pupils attending Ysgol Gymraeg Gwenllian over the last five years. However, numbers are now starting to increase and this trend is expected to continue.

### Capacity Information

Historical surplus places for Ysgol Gymraeg Gwenllian are shown in the following table:

	Jan 16	Jan 17	Jan 18	Jan 19	Jan 20
<b>Ysgol Gymraeg Gwenllian</b>					
Total Capacity	140	140	140	140	140
Pupil Numbers	136	129	120	117	119
Surplus	4	11	20	23	21
% Surplus	3%	8%	14%	16%	15%

As can be seen from the table, Ysgol Gymraeg Gwenllian’s % surplus has increased during 4 of the last 5 years. However, projections do show that numbers are expected to continue increasing gradually and by 2025 they are projected to have a small % surplus of only 3%.



## The Proposal

- Discontinue Ysgol Gynradd Mynyddygarreg from 31<sup>st</sup> August, 2021.
- From 1<sup>st</sup> September, 2021 all pupils will be registered at Ysgol Gymraeg Gwenllian operating on both sites (Ysgol Gymraeg Gwenllian and the former Ysgol Gynradd Mynyddygarreg) increasing its capacity to 178 + 17 nursery places.
- Re-designate Ysgol Gymraeg Gwenllian's catchment area to include that of the former Ysgol Gynradd Mynyddygarreg's catchment area as of 1<sup>st</sup> September, 2021.
- Relocate Ysgol Gymraeg Gwenllian to a new site and increase its capacity to 210 + 30 nursery places as of September 2023, when occupation of the new school is proposed.

## Location of new school building

As part of the 21<sup>st</sup> Century Schools Modernising Education Programme, a proposed preferred site for the location of the new school building has been identified. The location of the proposed preferred site is within a mile of the current Ysgol Gymraeg Gwenllian but is over a mile in distance from Ysgol Gynradd Mynyddygarreg. Whilst the proposals noted within this document are subject to County Council approval and the future capital investment is subject to business case approval by Welsh Government, consultation on relocating Ysgol Gymraeg Gwenllian is required in order to satisfy the School Organisation Code (2018).

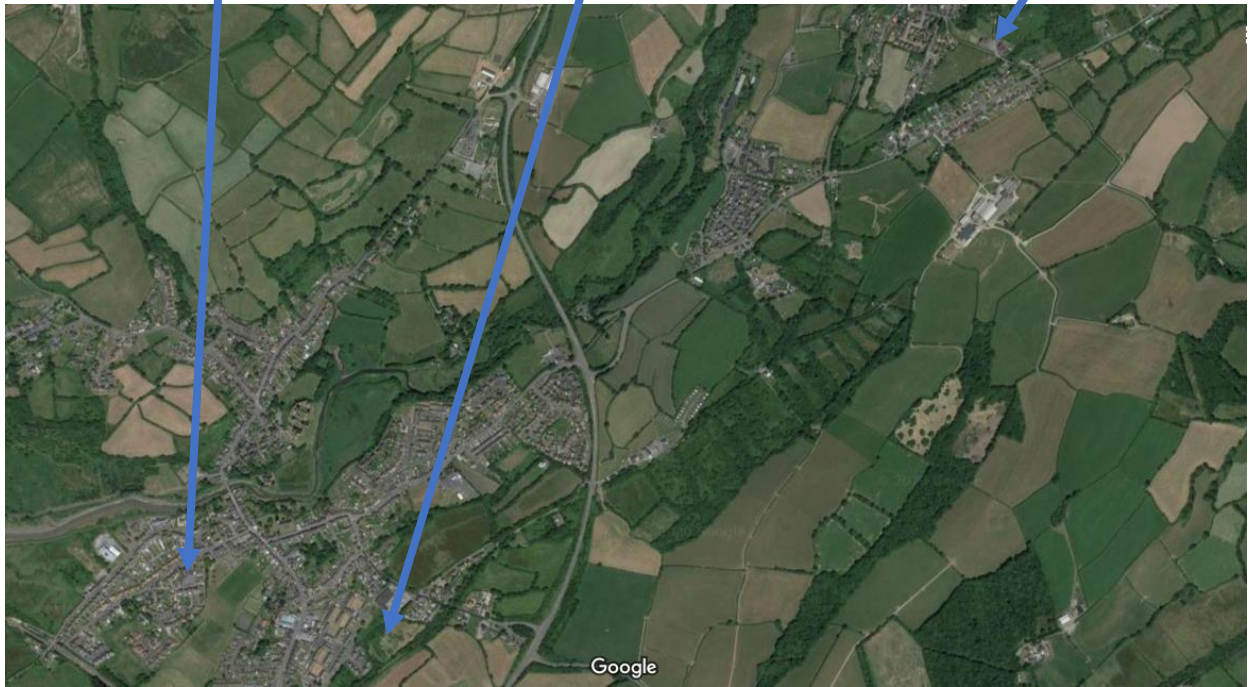
The aerial map shown on page 14 illustrates the proposed\* preferred location of the new school building.

*(\* Subject to gaining all relevant approvals.)*

Current Location of  
Ysgol Gymraeg Gwenllian

Preferred Site for Proposed  
New School Building

Current Location of  
Ysgol Gynradd Mynyddygarreg



Current Location of  
Ysgol Gymraeg Gwenllian

Preferred Site for Proposed  
New School Building



## Advantages and Disadvantages of the proposal

### Advantages

- Sufficient Welsh medium places to meet current and projected demand.
- Improved 21<sup>st</sup> century facilities to allow for a full delivery of the modern curriculum.
- Increased access to learning, sporting and cultural opportunities.
- Deliver primary education in buildings that meet the aspirations of the Local Authority's 21<sup>st</sup> Century Schools strategic outline programme.
- To ensure more efficient use of financial resources.
- Improved energy efficiencies of the estate.
- Reduces surplus places in an area to ensure the Local Authority makes best use of its resources and facilities.
- More fulfilling teaching environment improves morale.
- More effective staffing structures management and support.
- More opportunity for teachers professional and personal development.
- Learners will have an environment that will motivate their learning.
- Enhance community use of school facilities
- Enhanced external areas with purposeful outdoor play areas
- Fit for purpose nursery facilities in accordance with the Foundation Phase requirements,

### Disadvantages

- Requires a statutory process to instigate change.
- Dependent on business case approval to secure funding for investment.
- Increased travelling time for some pupils.
- Community of Mynyddygarreg lose presence of school within their immediate community/area.

### Risks and Counter Measures

Risk		Counter Measure
1.	Failure to obtain statutory approval to implement process.	- Follow guidelines as set out in the School Organisation Code 2018
2.	Failure to gain approval of business cases	- Follow guidelines as set out in the 21 <sup>st</sup> Century Schools and Education Funding Programme business case guidance 2018
3.	An unsatisfactory consultation with the community	- Develop communication strategy and consult on a regular basis to address concerns

## **School Catchment Area**

The current catchment area of Ysgol Gymraeg Gwenllian will be extended to accommodate the current catchment area of Ysgol Gynradd Mynyddygarreg (should the proposal to discontinue Ysgol Gynradd Mynyddygarreg be implemented).

## **Secondary School Transfers**

There will be no change to the current transfer arrangements for pupils in respect of Secondary education.

## **Staffing**

Staffing implications will be addressed in accordance with the County Council's Redeployment Policy and Procedures.

The Local Authority has staffing policies and procedures in respect of school reorganisation and these will be implemented if required. The Authority will support school staff in securing suitable alternative employment if at all possible, through redeployment processes should this be necessary.

## **WESP**

This proposal seeks to increase Welsh language provision in the Mynyddygarreg and Gwenllian areas. This supports the targets outlined in the LA's approved Carmarthenshire's Welsh in Education Strategic Plan 2017-2020 and supports Welsh Government's 'Cymraeg 2050: A Million Welsh Speakers' aim. It also supports the new county Welsh Language Targets set by WG for the 10-year Welsh in Education Strategic Plans.

## **Financial Implications - Revenue**

Both Ysgol Gynradd Mynyddygarreg and Ysgol Gymraeg Gwenllian are funded in accordance with the County Council's Fair Funding policy and will receive resources on the same basis as any other school within the County Council, based on pupil numbers and facilities.

## **Capital Receipts**

Any capital receipts received as a result of this proposal will be re-invested into the Modernising Education Programme.

## **Land and Buildings**

One redundant school site – Ysgol Gynradd Mynyddygarreg. Should the proposal be adopted the property will be transferred to Corporate Property Division of the Regeneration and Policy Department for the procedures outlined in the 'Future Use/Disposal of Redundant Land and Buildings arising from the Modernising Education Programme policy to be actioned. This policy has been developed to allow the community to be offered the asset in the first instance before placing the site on the open market.

## **Transitional Arrangements**

During the transitional period pupils will remain on their existing school sites under the management of Ysgol Gymraeg Gwenllian until the new build is ready for occupation to accommodate all pupils from Ysgol Gynradd Mynyddygarreg and Ysgol Gymraeg Gwenllian.

## **Admissions Arrangements**

The County Council is the Admissions Authority for Ysgol Gynradd Mynyddygarreg and Ysgol Gymraeg Gwenllian.

The School Admissions Unit,  
Carmarthenshire Local Authority,  
Department for Education and Children,  
Block 2,  
Main Building,  
St. David's Park,  
Carmarthen. SA31 3HB  
Tel No: 01267 246449

E-mail: [admissions@carmarthenshire.gov.uk](mailto:admissions@carmarthenshire.gov.uk)

## Transport Impact Assessment

Transport will be provided in accordance with the statutory requirements of the Learner Travel (Wales) Measure 2008. The distance from Ysgol Gynradd Mynyddygarreg to the new proposed site of Ysgol Gymraeg Gwenllian is over 1 mile.

Ysgol Gymraeg Gwenllian's new school building will be designed to incorporate safe areas for the drop-off and collection of pupils. If the proposal is approved, safe routes to school will be looked at as part of the Transport Impact Assessment for the new school building.

## Community Impact Assessment

Please refer to Appendix A of this consultation document for full details of the Community Impact Assessment undertaken.

## Welsh Language Impact Assessment

Please refer to Appendix B of this consultation document for full detail of the Welsh Language Impact Assessment undertaken.

## Equality Impact Assessment

Please refer to Appendix C of this consultation document for full details of the Equality Impact Assessment undertaken.

## Alternative Options Considered

In developing a preferred option, the Authority considered a range of alternative options.

<b>Status Quo no change to Ysgol Gynradd Mynyddygarreg</b>	
<b>Advantages</b>	<b>Disadvantages</b>
No change to stakeholders	Pupils continue to be taught in a condition C building
No statutory process required	Not financially viable for the long term
Mynyddygarreg Community retain the presence of a school	Pupils continue to be taught in multi-age classes
	Lack of sustainable leadership
	Low pupil numbers and high surplus places
	Inadequate modern facilities to support the new curriculum and digital learning



	Opportunities for synergies will be lost.
	Higher cost option.

<b>Federation- Formal federation between Ysgol Gynradd Mynyddygarreg and Ysgol Gymraeg Gwenllian</b>	
<b>Advantages</b>	<b>Disadvantages</b>
Opportunity to share management, governing body responsibility and curriculum expertise	Requires a legal process
Widen opportunities for staff professional development	Will not address deficit budget at Ysgol Gynradd Mynyddygarreg
Allows schools to pool resources and staff	Does not address low pupil numbers and surplus places at Ysgol Gynradd Mynyddygarreg
Extend the breadth and quality of education provision	Pupils continue to be taught in condition B/C buildings
Respond to pupils' wider needs	Does not provide pupils with modern 21 <sup>st</sup> century facilities
	Managing headteacher time across two schools
	Requires the rationalisation of both governing bodies
	More work for governors in the first year of Federation

<b>Status Quo remains for Ysgol Gynradd Mynyddygarreg/New School building for Ysgol Gymraeg Gwenllian</b>	
<b>Advantages</b>	<b>Disadvantages</b>
No change Ysgol Gynradd Mynyddygarreg stakeholders	Ysgol Gynradd Mynyddygarreg pupils continue to be taught in a condition C school building
No increased travelling times for Ysgol Gynradd Mynyddygarreg	Does not address low pupil numbers and surplus places at Ysgol Gynradd Mynyddygarreg
Mynyddygarreg Community retain the presence of a school	Does not address deficit budget at Ysgol Gynradd Mynyddygarreg
Ysgol Gymraeg Gwenllian pupils are provided with new 21 <sup>st</sup> Century School building and facilities	Business Case approval required to secure funding for new school building for Ysgol Gymraeg Gwenllian
Addresses the expected capacity pressure at Ysgol Gymraeg Gwenllian	
Ysgol Gymraeg Gwenllian are provided with modern facilities to support the new curriculum and digital learning	

Enhanced community facilities provided through investment for community of Kidwelly	
Ysgol Gymraeg Gwenllian pupils are provided with high quality learning environment to support the wellbeing of pupils and to enhance learner progress	

**Discontinue Ysgol Gynradd Mynyddygarreg and Ysgol Gymraeg Gwenllian and create a new area school**

<b>Advantages</b>	<b>Disadvantages</b>
Ysgol Gynradd Mynyddygarreg pupils will remain in their current school building until occupation of the new school*	Mynyddygarreg community lose the presence of a school in their community when pupils occupy the new school building*
Addresses the surplus spaces and capacity pressures at Ysgol Gymraeg Gwenllian	Statutory Processes required which would involve discontinuing both existing schools and the proposal of a new Welsh medium primary school.
Ensures all pupils are educated in condition A schools	Business Case approval required to secure WG grant.
All pupils are provided with modern facilities to support the new curriculum and digital learning	Change for stakeholders
Addresses the deficit budget at Ysgol Gynradd Mynyddygarreg	Statutory Processes required to discontinue both governing bodies and create a new governing body.
Provides enhanced community facilities for use by both Mynyddygarreg and Kidwelly communities	A lack of support from the community of Ysgol Gwenllian as they will lose their school identity.
All pupils would be located on one site under the leadership of one Headteacher.	Additional travelling time for some pupils from Ysgol Mynyddygarreg.
Increased age range offering early years provision.	

**Preferred Option**

**Discontinue Ysgol Gynradd Mynyddygarreg and include its catchment area within the current catchment area of Ysgol Gymraeg Gwenllian**

<b>Advantages</b>	<b>Disadvantages</b>
Ysgol Gynradd Mynyddygarreg pupils will remain in their current school building until occupation of the new school*	Mynyddygarreg community lose the presence of a school in their community when pupils occupy the new school building*

Addresses the surplus spaces and capacity pressures at Ysgol Gymraeg Gwenllian	Statutory Process required
Ensures all pupils are educated in condition A schools	Business Case approval required to secure WG grant.
All pupils are provided with modern facilities to support the new curriculum and digital learning	Change for stakeholders
Addresses the deficit budget at Ysgol Gynradd Mynyddygarreg	Additional travelling time for some pupils from Ysgol Mynyddygarreg.
Ysgol Gwenllian will maintain its identity within the community.	No job security for some members of staff.
Provides enhanced community facilities for use by both Mynyddygarreg and Kidwelly communities	
All pupils would be located on one site under the leadership of one Headteacher.	
Increased age range offering early years provision.	

***\*Business case approval/WG funding***

## School(s) affected by this proposal

	Ysgol Gynradd Mynydd-y-garreg	Ysgol Gymraeg Gwenllian	Ysgol y Castell	Ysgol y Fro	Ysgol Gynradd Gwynfryn	Ysgol Gynradd Pontiets	Ysgol Gynradd Yr Eglwys yng Nghymru Glanyfferi	Ysgol Gynradd Carwe	Ysgol Gymunedol Trimsaran	Ysgol Penbre	Ysgol Gymraeg Parc y Tywyn	
<b>School Location</b>	SA17 4RL	SA17 4UT	SA17 4TR	SA17 5BW	SA15 5SN	SA15 5UB	SA17 5TB	SA17 4HE	SA17 4BE	SA16 0TP	SA16 0NL	
<b>County</b>	<b>Carmarthenshire</b>											
<b>Age Range</b>	4-11	3-11	3-11	4-11	4-11	4-11	4-11	4-11	3-11	3-11	3-11	
<b>School Category</b> (Community [C], Voluntary Aided [VA], Voluntary Controlled [VC])	C	C	C	C	C	C	VC	C	C	C	C	
<b>Language Medium Category (PLASC)</b>	WM	WM	EM	WM	WM	WM	WM	WM	WM	EM	WM	
<b>Number of registered Pupils (January 2020 )</b>	<b>Nursery</b>	1	19	25	2	1	0	2	4	39	37	39
	<b>Reception – Y.6</b>	35	100	208	26	60	37	37	54	151	194	223
	<b>Total</b>	<b>36</b>	<b>119</b>	<b>233</b>	<b>28</b>	<b>61</b>	<b>37</b>	<b>39</b>	<b>58</b>	<b>190</b>	<b>231</b>	<b>262</b>
<b>Number of pupils previously on the register</b>	<b>January 2019</b>	35	117	257	28	62	41	40	55	184	241	270
	<b>January 2018</b>	32	120	263	33	64	44	44	48	171	235	270
	<b>January 2017</b>	29	129	267	32	67	52	62	40	172	235	262
	<b>January 2016</b>	33	136	264	33	70	53	74	52	185	238	252

School Name		Ysgol Gynradd Mynydd-y-garreg	Ysgol Gymraeg Gwenllian	Ysgol y Castell	Ysgol y Fro	Ysgol Gynradd Gwynfryn	Ysgol Gynradd Pontiets	Ysgol Gynradd Yr Eglwys yng Nghymru Glanyfferi	Ysgol Gynradd Carwe	Ysgol Gymunedol Trimsaran	Ysgol Penbre	Ysgol Gymraeg Parc y Tywyn
Pupil Projections	January 2021	38	125	235	27	58	35	36	60	203	229	257
	January 2022	42	130	232	29	55	33	36	63	209	225	263
	January 2023	40	131	229	28	53	27	36	59	208	229	268
	January 2024	37	133	233	28	49	28	33	59	205	221	260
	January 2025	39	135	233	24	50	27	34	57	214	223	256
Capacity (including nursery)		55	140	244	41	96	85	122	124	240	240	360
Cost per pupil (2020/21)		£4,768	£3,611	£3,998	£4,478	£4,297	£5,491	£4,423	£4,738	£3,871	£3,724	£3,627
School Budget		£172k	£412k	£906k	£125k	£262k	£209k	£173k	£275k	£705k	£827k	£908k
Estyn Inspection Result		<a href="#">Estyn</a>	<a href="#">Estyn</a>	<a href="#">Estyn</a>	<a href="#">Estyn</a>	<a href="#">Estyn</a>	<a href="#">Estyn</a>	<a href="#">Estyn</a>	<a href="#">Estyn</a>	<a href="#">Estyn</a>	<a href="#">Estyn</a>	<a href="#">Estyn</a>
Building Category	Condition	C	B	B	B	B	C	C	B	A	B	A

## Evaluation of Present Arrangements

### Ysgol Gynradd Mynyddygarreg

Estyn inspected Ysgol Gynradd Mynyddygarreg in June 2014. The school's standards were judged to be 'Adequate'. As a result of this, the school was deemed as requiring monitoring. It's capacity to improve was judged to be 'good' and the school's good progress against Estyn's recommendations, following intensive support from the school improvement service, witnessed the school's removal from Estyn monitoring in December 2015.

The current Headteacher was appointed to his post in January 2020 in an informal federation with Ysgol Gwenllian. The previous Headteacher had been in post from September 2018 until December 2019.

Pupils are being taught within two classrooms: one Foundation Phase class and one Key Stage 2 class each spanning four year groups. There is currently a Headteacher (0.2) employed at the school along with 2 full time teachers and 2 full time Teaching Assistants.

### Standards

- School baseline data confirms that most children start school at a level lower than expected when compared to the age appropriate behaviours. Nearly all the pupils at the school make the expected progress given their starting at the school. A few pupils make better than expected progress in terms of their age and ability.
- Most pupils listen attentively to adults and each other and speak confidently in a range of situations. Nearly all children progress in line with their age and ability in their oral, reading and writing skills and taking into account their starting points at the school.
- Many children develop number skills in line with their age and ability and use the correct methods to solve problems effectively. Many are able to use data effectively and use their number skills purposefully across the curriculum.
- Most pupils are confident in using information technology and successfully use HWB to enrich learning across the curriculum
- There is a variable trend in the results of assessments at the end of the foundation stage at the expected outcome over the past three years. At the higher levels, there is again a variable pattern. The effect of pupils with additional learning needs within all cohorts has a dramatic effect on the FPI and the CSI.
- At the end of key stage 2, there has been an upward trend in results across the subjects over the past two years. Tracking data showed that the boys are making good progress in line with age and ability and when considering their low starting point. This variability is also true of the eFSM cohort. However, nearly all pupils who are eligible for free school meals continue to make good progress from their starting points and this is reflected in the tracking data held by the school.

## Wellbeing Standards

- School Attendance has improved over the past year as a result of effective interventions by the school. Statutory School Age attendance has increased by 2.88% points from 90.93% in 2017-18 to 93.81% in 2018-19. Whole school attendance has increased by 2.38% points from 91.84% in 2017-18 to 94.22% in 2018-19.
- Most pupils enjoy their learning. They have good attitudes to learning and benefit from the regular links with other schools.
- Most pupils' behaviour is good. They co-operate constructively in their groups and respond appropriately to the tasks that are set.

## Teaching and learning experiences

- The effective use of Tric a Chlic in foundation phase is having a positive effect on raising standards as pupils progress from group to group at the expected rate. Pupils in Key Stage 2 have been grouped according to ability for Welsh and English reading sessions and the effective differentiated provision ensures that nearly all pupils are making purposeful progress. These sessions are delivered daily for 30 minutes. Pupils are assessed every ½ term and the school tracking procedures show that most pupils are making good progress from their starting points and in line with age and ability. Reading homework has been introduced to all children from nursery to year six. Parents meetings include the sharing of school strategies to improve reading and purposeful Individual target sheets were introduced at parents evening this year.
- Beneficial learning areas have been introduced to Key Stage 2 and this has resulted in pupils being able to choose their own learning activities during the challenges sessions. Tasks are effectively differentiated to cater for the broad range of ability within the class. School monitoring has shown that pupils are becoming more independent and selecting challenges that put them in the stretch zone. However, more work needs to be done in order to improve the learning environment to further facilitate independence.
- An effective new school planning system has been introduced using SharePoint and Excel. Teachers plan in collaboration with others in the federation to ensure effective skills development. Teachers have attended courses on effective planning for challenges / missions in Key Stage 2. And the impact of this professional learning activity is evident in the classroom practice. Staff responsibilities have been re-distributed in line with the new areas of learning. Staff have been involved in the observation of learning and scrutiny of pupils work and have created evaluative reports which have been shared with the governing body. Monitoring by staff is purposeful and in line with the school development plan.
- The school have successfully implemented strategies to increase the profile of the Welsh language. They have gained the bronze award and in order to move forward to work on the silver award, it was decided to keep the 'Crew Cymraeg' in order to maintain consistency, before thinking about changing members in September. The Welsh crew were of the opinion that they did not want to be rewarded for speaking Welsh during the first year, but we have now decided to start rewarding effort, fluency and accuracy from September onward. Ynni Da

provided a session about Welsh music with everyone, followed by a disco of pedal power on the yard in the sunshine. As a result, the school has decided to choose a different Welsh band / artist for every fortnight. Their music will often be played, and the Cymraeg Criw Cymraeg 'will listen to FM Wales to conduct research. To succeed in the silver award, the school need to work with the community. and think it might be an idea to work as a cluster to promote the Welsh language in the Mynydd y Garreg and Kidwelly area.

## Care support and guidance

- The school operates as a happy and caring community. High priority is given to pupils' wellbeing.
- The school tracks and monitors pupils' progress and wellbeing effectively, which includes attendance and behaviour data, as they move through the school. This information feeds purposefully into the self-evaluation processes.

## Leadership and Management

- The current Headteacher was appointed to his post in January 2020 in an informal federation with Ysgol Gwenllian. The previous Headteacher had been in post from September 2018 until December 2019.
- The current and previous headteacher provides strong leadership and focuses successfully on raising pupils' standards. There is a clear vision for the school and this is communicated to all staff, pupils and parents. The whole school community works closely as a team for the benefit of all pupils and they ensure that pupils' wellbeing is at the heart of the school community.
- Governors have a good grasp of the school's standards. They are aware of the school's strengths and areas for improvement, they support the school effectively and challenge leaders purposefully.
- Self-evaluation procedures are effective and consider a wide range of first-hand evidence, such as data analysis, lesson observations and learning walks. Staff use the self-evaluation information well to identify the school's improvement priorities and to review progress against the priorities in the school development plan.
- The school development plan includes relevant and measurable actions for improvement, identifies clear milestones for monitoring and identifies the staff and governors that are responsible for each aspect.
- Procedures for managing staff performance are robust and link clearly with the school's development priorities and the staff's individual professional requirements. This helps ensure a consistency of approach and limits the effect of any in school variation in the standards of teaching and learning.
- The school has a specific focus on developing all of the staff's skills, and there is a valuable range of training opportunities and specific courses for them.
- The school tackles any instances of underperformance effectively through the Performance management system.
- Specific grants are used purposefully to ensure that specific groups of pupils make good progress. Good use is made of the pupil development grant to



improve provision to develop the literacy and numeracy skills of pupils who are eligible for free school meals further. As a result, most pupils who are eligible make good progress in their reading skills from their starting points.

## **Impact of the proposal**

The proposal will ensure a consistent approach to teaching across the school, thus reducing in school variation appropriately. The opportunity to share ideas and good practice will also have a positive impact on pupils and staff.

Staff welfare will also improve as they will be able to share responsibilities.

## Ysgol Gymraeg Gwenllian

Ysgol Gymraeg Gwenllian was last inspected by Estyn in April 2014 when the school's standards and capacity to improve were judged as 'adequate'.

Pupils are currently taught in five classes – Nursery/Reception class, Year 1/ 2 class, Year 3 class, Year 4 class and Year 5/6 class. There is a Headteacher (0.8) employed at the school. There is also an Assistant Headteacher, 5 full time teachers (one of which is currently on Maternity Leave), 4 full time Teaching Assistants and 1 x 0.8 Teaching Assistant.

### Standards

- Most pupils listen attentively to each other and adults in the classroom. Many foundation phase pupils develop consistently good Welsh oral skills at the expected levels for their age and ability. However, a few pupils have some difficulty pronouncing correctly, and are receiving support from an intervention program. Most KS2 pupils are able and ready to discuss their work comprehensively and work effectively during oracy tasks giving thorough reasons for their opinions. However, a few pupils tend to turn to English when communicating with their peers.
- Many pupils read at a level that is expected for their age and ability. Many pupils read accurately and have a clear understanding of the text. Many foundation phase pupils can identify letters and sounds effectively. Most upper foundation phase pupils are able to decode unfamiliar words successfully giving them an understanding. Many pupils across the school can predict what might happen next in stories purposefully. However, only around half of pupils read with fluency and expression to an audience.
- Many of the pupils' written work is appropriate to their age and ability. Spelling and grammar is consistently good in the majority of pupils' work. Many pupils' handwriting and presentation is consistent in style. However, a few pupils do not present their work well enough. There is a comprehensive range of genres in the pupils' work and many use effective punctuation to organise their work. Many KS2 pupils plan and re-draft parts of their work successfully in most classes. Many pupils also transfer their writing skills well to online and cross curricular tasks. The majority of KS2 pupils skilfully use a comprehensive vocabulary to engage readers.
- Most pupils use their numeracy skills effectively in different contexts. Evidence from the National tests show that most pupils have strong reasoning skills whilst many have strong numeracy skills. Many pupils have a comprehensive understanding of place value and many pupils in upper KS2 order decimals correctly consistently. Many pupils apply their numeracy skills across the curriculum effectively. For example, decoding problems from the Second World War. The majority of pupils can solve problems skilfully involving money and measures that are appropriate to their age and ability. Many pupils can be seen to use their good numeracy skills well in maths lessons and across the curriculum. Nearly all upper KS2 pupils participate in Money Wise (Financial Literacy) activities and most are developing a strong understanding about wages, payslips, budgeting and borrowing money.

- Most pupils have valuable ICT skills for their age and ability. Many pupils use a comprehensive range of applications to support their learning across the curriculum. Many pupils create effective multimedia presentations about their work/theme/investigations that include QR codes, images and videos. Most pupils use the internet safely to thoroughly research information online and share their findings via J2e and Padlet. However, the DCF needs to have a greater focus to develop staff and pupils' skills further.

## Wellbeing Standards

- Most pupils can work independently and give thorough reasons for their opinions. Most pupils build on their previous knowledge effectively and adjust their skills in new situations in order to make effective progress.
- Evidence from KS2 pupil questionnaires (Autumn 2019) show that nearly all pupils have positive attitudes towards healthy living. Nearly all pupils feel safe in the school and nearly all pupils know the name of the Senior Child Protection Officer
- Most pupils are happy to take responsibility for leading school groups and play a full part in school life. The School Council, Eco Council, Sports Ambassadors and Super Ambassadors (Children's Rights) play an important role in school life and are effective in making decisions. The School Council were an integral part and have made valuable contributions to the design of the new school building. The School Council also has a Suggestion Box to ensure that all pupils play a part in decisions regarding the school.
- Most pupils show care, respect and concern for others and take responsibility for their own actions. Ysgol Gymraeg Gwenllian is a school with a strong Christian ethos where pupils are encouraged to respect and care for all members of the school community and building.
- Nearly all pupils feel valued and participate fully in the school and wider community.
- There was a downward trend in attendance from 95.8% to 94.3% from 2015 to 2017. However, there has been an upward trend for the last two years, increasing this year to 95.25%.

## Teaching and Learning Experiences

- Many of the teaching, and its impact on most pupils' learning and progress is consistently good. The characteristics of good and excellent teaching are well defined. However, within a minority of classroom practice they are applied inconsistently.
- The school takes account of national and local priorities. Staff and pupils' understanding of the four core purposes are developing well, and there has been good progress in outdoor provision within the foundation phase. However, there is room to develop this across the school further.
- The school offers a broad and balanced curriculum that is enriched with stimulating and challenging experiences that meet the needs of nearly all pupils.

Lesson observations highlighted that the pupils received valuable challenge in many lessons.

- The school has worked successfully with other schools to share good practice, for example on See-Saw, to collect evidence and observations to improve teacher assessments and in-turn pupil standards. The school also works effectively in collaboration as part of a triad to share good practice across schools and work together to develop for example key stage 2 independent learning.
- All members of staff have clearly defined roles and responsibilities, and professional standards are met successfully in most cases.
- There are successful strategies to identify and share effective practice. However, there is room for greater sharing of good practice internally within the school.
- Robust processes are in place to track pupils' progress and identify needs effectively in nearly all cases.
- Teacher assessment is consistent and accurate.

## Care, Support and Guidance

- Nearly all pupils are tracked effectively with regards to their progress, wellbeing and attendance.
- The school tracks and monitors pupil progress effectively using an online tracking system, namely Incerts, and targets generated impact on pupils' needs or performance. Consequently, most pupils are effectively challenged and the needs of most pupils are met.
- Effective baseline assessments are made in the Nursery and Reception class to understand the true baseline of nearly all pupils starting at the school.
- Purposeful pupil voice is evidenced at the start and end of each term in the form of a spider diagram of ideas and an activity to evaluate strategies and content at the end of the term.
- Throughout the term pupils have valuable opportunities to plan, this is evidenced by activities noted in purple in the foundation phase continuous provision planning and 'meysydd mentro' in key stage 2.
- The use of Speakr and 'Saib a symud' are now fully embedded throughout the school.
- All ALN pupils have individual IDPs tailored to their needs and targets are set each term. One Page Profiles are designed to ensure that pupils have a voice, pupils contribute their views and needs to their IDPs.
- The school is developing as a Person Centred Planning School.
- The school has effective policies and procedures in place with regard to safeguarding pupils.
- Safer recruitment procedures are followed prior to and during new appointments as the Headteacher and Chair of Governors have received Safer Recruitment training. The school ensures that two references are received prior to the commencement of any new staff members.

## Leadership and Management

- The head teacher is new to post from Autumn 2018. The head teacher and staff have a clear shared vision that has improved outcomes for most learners.
- The school has gone through a lot of change. The head teacher has planned and implemented change successfully in most respects. However, pace of engagement and participation in change in a very few aspects is slower than expected.
- The school has a purposeful self-evaluation timetable and strong self-evaluation processes in place. These processes effectively identify strengths and areas for development within teaching and learning. The wider SLT members are now becoming much more confident to lead these processes.
- Many leaders and staff analyse and use performance data well and have a clear understanding of strengths and improvement priorities. However, there needs to be less focus on end of key stage data.
- The school development plan has clear priorities. The school has a very good track record in raising the achievement of nearly all pupils including pupils eligible for free school meals and other vulnerable groups over a three-year period.
- The governors have a very good understanding of the school's strengths and areas for improvement and are highly effective in supporting and challenging the school's performance.

## Impact of the proposal

The pupils and staff would benefit greatly from a Carmarthenshire standard new build school with 21<sup>st</sup> Century facilities as the current school building is condition B rated with inadequate facilities.

A new site with improved resources will enhance pupils' learning experiences as well as improving staff and pupils' wellbeing.

The proposal will ensure a consistent approach to teaching across the school, thus reducing in school variation appropriately. The opportunity to share ideas and good practice will also have a positive impact on pupils and staff.

Staff welfare will also improve as they will be able to share responsibilities.

## The Consultation Process

The consultation on this proposal will follow guidelines established by the Welsh Government as stated in the School Organisation Code (2018).

### Who will be consulted?

This document will be sent to the following interested parties:

Staff (Teaching and Ancillary)	Director of Education – All Neighbouring Authorities
Governors and Parents/Guardians	Diocesan Director of Education Church in Wales and RC
Local County Councillors	Estyn
Community Councillors	Regional Transport Consortium
Member of the Senedd (MS) / Regional Members / Members of Parliament (MP)	Neighbouring Primary and Secondary schools
Welsh Ministers	All relevant unions
SEN Partners	Welsh Language Commissioner
LA Special Educational Needs Division	Local Police and Crime Commissioner
ERW – Education through Regional Working	Flying Start
	Child Care / Early Years
Communities for Work +	Public Services Board
Communities for Work	Legacy
Fusion	Families First Carmarthenshire

***\*Copies of the consultation document will be sent to the Head teacher and Chair of Governors of the surrounding catchment area of schools subject to proposals.***

## Consultation Period

The consultation period for the proposals starts on 11<sup>th</sup> January, 2021 and ends on 21<sup>st</sup> February, 2021.

Consultees can submit their views in favour of or against a proposal. Responses received during the consultation period will not be treated as statutory objections. If consultees wish to object, they will need to do so in writing during the statutory objection period outlined on page 28.

### Considering your views

During the consultation period you can ask questions and express your views by writing a letter to the address below or by completing an online survey using the following link:

**Insert Link**

Letters should be sent to the following address by no later than noon on 21<sup>st</sup> February, 2021:

Mr Gareth Morgans, Director of Education and Children,  
Building 2, St. David's Park, Jobs Well Road, Carmarthen, SA31 3HB  
Or E-mail to: [DECMEP@carmarthenshire.gov.uk](mailto:DECMEP@carmarthenshire.gov.uk)

### Drop in sessions

Due to the ongoing implications of the Coronavirus issue we have been advised to postpone all events where there is interaction between staff, parents and the wider community and as a result there will not be a drop in session to discuss proposals. Should you feel strongly about discussing the proposals please contact Mr Martin Jones or Mrs Rhianydd Evans by sending an e-mail to [DECMEP@carmarthenshire.gov.uk](mailto:DECMEP@carmarthenshire.gov.uk) and a virtual meeting can be arranged.

### Consultation with Pupils

There will be an opportunity for the pupils of the schools subject to the proposals to participate in the consultation process during a session which will be conducted at the schools.

The information gathered from the consultation with pupils will form part of the consultation report which will be submitted to the Executive Board for consideration following the consultation period.

## **Consultation Report**

A Consultation Report will be published on Carmarthenshire County Council's website at least 2 weeks before a decision is made on whether or not to proceed to publish a statutory notice. Hard copies of the report will also be available on request. The report will summarise the issues raised by consultees and provide Carmarthenshire County Council's response to these issues. The report will also contain Estyn's view of the proposal and details of consultation undertaken with the pupils.

The Executive Board of Carmarthenshire County Council will consider the consultation report and decide whether or not to proceed with the proposal.

If the Executive Board decides to continue with the proposal Carmarthenshire County Council must publish a statutory notice.

## **Statutory Notice**

The statutory notice will be published on Carmarthenshire County Council's website and posted at the schools subject to proposals. Copies of the notice will be made available to the schools to distribute to pupils, parents, guardians, and staff members (the schools may also distribute the notice by email).

### **Statutory Objection Period**

The statutory notice will set out the details of the proposal and invite anyone who wishes to object to do so in writing within a period of 28 days. If objections are received an objection report will be published on the Carmarthenshire County Council website. Hard copies of the report will also be available on request. The report will summarise the issues raised and provide Carmarthenshire County Council's response to those objections.

## **Determination of Proposal**

Carmarthenshire County Council will determine the proposal. The County Council may decide to approve, reject or approve the proposal with modifications. In doing so, the County Council will take into account any statutory objections that it received.

### **Decision Notification**

Following determination of proposals all interested parties will be informed and advised of the availability of the decision which will be published electronically on Carmarthenshire County Council's website.



## The Statutory Process Time-Table

The statutory process and timetable will be as follows:

11 <sup>th</sup> January 2021	Issue of this consultation document to identified and other interested parties.
21 <sup>st</sup> February 2021	Closing date for views on the proposal to be received by the Department for Education and Children.
27 <sup>th</sup> April 2021	<p>A Consultation Report will be taken to the Executive Board for a decision on whether or not to proceed to publish a statutory notice. OR alternatively proposal ends.</p> <p>The Consultation Report will be published on Carmarthenshire County Council's website at least 2 weeks prior to the publication of a statutory notice.</p> <p>If the decision is made to proceed then a statutory notice will be published. The notice will outline details of the proposal and be published on the Council's web site and be displayed near the entrance of the school and schools which are subject to the proposals. Copies of the notice will be made available to the school to distribute to parents, guardians and staff members. Following publication there will be a 28 day period during which time formal written objections will be invited.</p> <p>The statutory notice will give details on how you may record your objections to the proposal.</p>
8 <sup>th</sup> June 2021	End of formal 28 day notice period for objections. County Council will determine the proposal. The County Council may decide to approve, reject or approve the proposal with modifications, in doing so the County Council will take into account any statutory objections received.
July 2021	<p>Deadline to notify parents of intention to implement proposal.</p> <p>Following determination of proposals all interested parties will be informed and advised of the availability of the decision which will be published electronically on Carmarthenshire County Council's website.</p>

## **Appendix A – Community Impact Assessment**

Each school has an area that it serves, referred to as the catchment area. Each school is expected to accommodate pupils from within its catchment area and schools must have regard for this ongoing demand.

Most parents send their child to their local school but parents have a right to state a preference for other schools.

### **Ysgol Gynradd Mynyddygarreg**

#### **Catchment Area Analysis – January PLASC 2020 Data**

##### **Pupils attending the school from inside / outside the catchment**

Based on January PLASC 2020 data, the geographical data in relation to the pupil distribution for Ysgol Gynradd Mynyddygarreg catchment area indicated that of the 36 pupils on roll, 22 lived within the catchment area, whilst the remaining 14 were from outside the catchment area.

##### **Pupils living in the catchment area attending other schools.**

Based on January PLASC 2020 data, 91 pupils lived within the Ysgol Gynradd Mynyddygarreg catchment area attended other schools.

Taking into consideration the 22 pupils living within the catchment area attending Ysgol Gynradd Mynyddygarreg, and the 91 pupils living within the catchment area but attending other schools, a total of 113 pupils are living within the catchment area of Ysgol Gynradd Mynyddygarreg.

##### **Other facilities or services provided by the school e.g. after school clubs/ community Library**

The school currently hold a breakfast club for pupils during the weekdays between 8:00am - 8.45am.

Prior to the COVID-19 pandemic the pupils also benefitted from an after-school care club, which was held every Tuesday and Thursday from 3.00pm – 5.30pm.

##### **Community Impact**

The Mudiad Meithrin currently use the Hall at Ysgol Gynradd Mynyddygarreg.

## **Ysgol Gymraeg Gwenllian**

### **Catchment Area Analysis – January PLASC 2020 Data**

#### **Pupils attending the school from inside / outside the catchment**

Based on January PLASC 2020 data, the geographical data in relation to the pupil distribution for Ysgol Gymraeg Gwenllian catchment area indicated that of the 119 pupils on roll, 70 lived within the catchment area, whilst the remaining 49 were from outside the catchment area.

#### **Pupils living in the catchment area attending other schools**

Based on January PLASC 2020 data, 192 pupils lived within the Ysgol Gymraeg Gwenllian catchment area attended other schools. However, of these pupils, 130 pupils were attending Ysgol y Castell to access English medium education. Both Ysgol y Castell and Ysgol Gwenllian share the same catchment area.

Taking into consideration the 70 pupils living within the catchment area attending Ysgol Gymraeg Gwenllian, and the 192 pupils living within the catchment area but attending other schools, a total of 262 pupils are living within the catchment area of Ysgol Gymraeg Gwenllian.

#### **Other facilities or services the school provides e.g. after school clubs / community library**

The school currently hold a breakfast club for pupils during the weekdays between 8:00am - 8.45am.

Prior to the COVID-19 pandemic the pupils also benefitted from an after-school care club, which were held Monday to Friday between 3:00pm and 5:30pm.

The school also arranges classes for parents to enable them to assist their children to improve their Numeracy and Literacy skills.

#### **Community Impact**

Due to the lack of space at the school, no other organisations make use of the school building or facilities.

## Appendix B – Welsh Language Impact Assessment

Carmarthenshire County Council's vision is to provide a service, which will ensure access to high quality learning opportunities for all children, young people and adults, this enabling the achievement of their full potential within the context of the unique bilingual nature of the county.

This proposal supports the Council's vision and aims for Welsh medium education as set out in Carmarthenshire's Welsh in Education Strategic Plan (WESP) 2017 – 2020. The proposal will allow greater opportunities for access to Welsh medium education within the Kidwelly and Mynyddygarreg area and will ensure linguistic continuity from the nursery sector along the key stages to the secondary sector so that every pupil becomes fluent and confident in both Welsh and English languages.

### Ysgol Gynradd Mynyddygarreg

#### Standards \*

In the Foundation Phase, pupils are assessed in different areas of learning. Based on 2019 data, 83.3% of pupils achieved at least Outcome 5 in 'Language, Literacy and Communication (in Welsh)'. In Key Stage 2, pupils are assessed in each of the core subjects. Based on 2019 data, 75% of pupils achieved at least Level 4 in Welsh first language.

#### After school activities which provide additional opportunities to use the Welsh language

The school currently run Clwb yr Urdd for pupils. Pupils also take part in Eisteddfod yr Urdd, Eisteddfod Mynyddygarreg and Urdd Swimming Competition.

### Ysgol Gymraeg Gwenllian

#### Standards \*

In the Foundation Phase, pupils are assessed in different areas of learning. Based on 2019 data, 92.9% of pupils achieved at least Outcome 5 in 'Language, Literacy and Communication (in Welsh)'. In Key Stage 2, pupils are assessed in each of the core subjects. Based on 2019 data, 100% of pupils achieved at least Level 4 in Welsh first language.

#### After school activities which provide additional opportunities to use the Welsh language

The school currently run Clwb yr Urdd for Pupils. Pupils also take part in Eisteddfod yr Urdd, Eisteddfod Mynyddygarreg an various Urdd Sports Competitions (Rugby, Football, Cricket, Netball, Swimming and Gymnastics).

*\* No National Teacher assessments were conducted in 2020 due to the ongoing impact of the Coronavirus outbreak. For this reason, 2019 has been used.*

## Appendix C – Equalities Impact Assessment

### Carmarthenshire County Council Assessing Impact

#### The Equality Act 2010

The Equality Act 2010 (the Act) brings together and replaces the previous anti-discrimination laws with a single Act. It simplifies and strengthens the law, removes inconsistencies and makes it easier for people to understand and comply with it. The majority of the Act came into force on 1 October 2010.

The Act includes a new public sector equality duty (the 'general duty'), replacing the separate duties on race, disability and gender equality. This came into force on 5 April 2011.

#### What is the general duty?

The aim of the general duty is to ensure that public authorities and those carrying out a public function consider how they can positively contribute to a fairer society through advancing equality and good relations in their day-to-day activities. The duty ensures that equality considerations are built into the design of policies and the delivery of services and that they are kept under review. This will achieve better outcomes for all.

The duties are legal obligations. Failure to meet the duties may result in authorities being exposed to legal challenge.

Under equality legislation, public authorities have legal duties to pay 'due regard' to the need to eliminate discrimination and promote equality with regard to race, disability and gender, including gender reassignment, as well as to promote good race relations. The Equality Act 2010 introduces a new public sector duty which extends this coverage to age, sexual orientation, pregnancy and maternity, and religion or belief. The law requires that this duty to pay 'due regard' be demonstrated in the decision making process. It is also important to note that public authorities subject to the equality duties are also likely to be subject to the obligations under the Human Rights Act and it is therefore wise also to consider the potential impact that decisions could have on human rights as part of the same process.

### **Carmarthenshire's approach to Equality Impact**

In order to ensure that the council is considering the potential equality impact of its proposed policies and practices, and in order to evidence that we have done so, every proposal will be required to be supported by the attached Equality Impact Assessment. Where this assessment identifies a significant impact then more detail may be required.

### **Reporting on assessments**

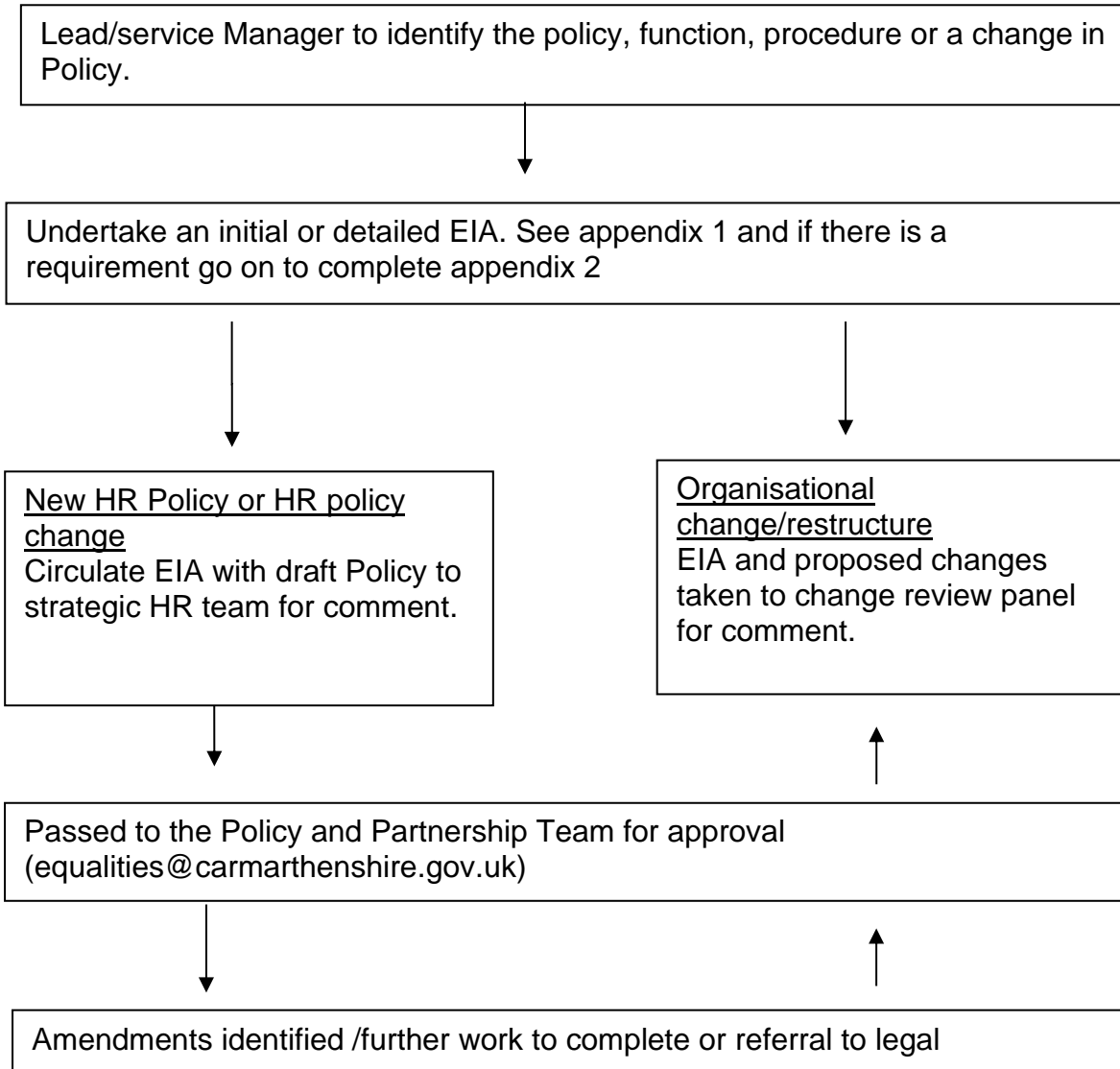
Where it is clear from the assessment that the likely impact on the authority's ability to meet the general duty is substantial, then it must publish a report.

### **Initial and Detailed Equality Impact Assessments**

The initial EIA (appendix 1) is a simple and quick method of assessing the effect of a policy, function, procedure, decision including financial cuts on one or more of the protected characteristics.

The Service Manager responsible for the relevant new or revised policies, functions, procedures and financial decisions must undertake, at least, an initial EIA and where relevant a detailed Equality Impact Assessment (appendix 2); EIA must be attached as background paper with reports to Executive and Scrutiny.

**Equality impact assessment – Process to follow where HR implications have been identified**



**Initial Equalities Impact Assessment Template**

**Appendix 1**

<b>Department:</b> Education & Children	<b>Completed by (lead):</b> Sara Griffiths	<b>Date of initial assessment:</b> February 2020 <b>Revision Dates:</b> February 2021
<b>Area to be assessed: (i.e. name of policy, function, procedure, practice or a financial decision)</b>	This proposal is to review primary education provision in the Mynyddygarreg and Gwenllian areas. The scheme will re-locate Ysgol Gymraeg Gwenllian to a new site with investment to provide increased capacity in a new school building with 21 <sup>st</sup> Century facilities and excellent outdoor areas. As part of this scheme, the proposal is to increase the capacity of the school to 240 (210 + 30 nursery places).	
<b>Is this existing or new function/policy, procedure, practice or decision?</b>	School Re-organisation Proposal – Modernising Education Programme	
<b>What evidence has been used to inform the assessment and policy? (please list only)</b>		
<ul style="list-style-type: none"> <li>• 21<sup>st</sup> Century Schools Programme</li> <li>• Modernising Education Programme</li> <li>• School Organisation Code 2018</li> <li>• PLASC Data 2020</li> <li>• The Well-being of Future Generations (Wales) Act 2015</li> </ul>		

<b>1. Describe the aims, objectives or purpose of the proposed function/policy, practice, procedure or decision and who is intended to benefit.</b>	The aim of the proposal is to discontinue Ysgol Gynradd Mynyddygarreg and include its catchment area within the current catchment area of Ysgol Gymraeg Gwenllian. This proposal will increase the capacity and number of Welsh medium places available at Ysgol Gymraeg Gwenllian and follow the objectives and actions as set out in Carmarthenshire’s Welsh in Education Strategic Plan. The scheme will also provide the pupils and staff of Ysgol Gymraeg Gwenllian with a new school building and facilities which are suitable for teaching and learning in the 21 <sup>st</sup> Century with sufficient capacity for current and future pupils.
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<p><b>The Public Sector Equality Duty requires the Council to have “due regard” to the need to:-</b></p> <p><b>(1) eliminate unlawful discrimination, harassment and victimisation;</b></p> <p><b>(2) advance equality of opportunity between different groups; and</b></p> <p><b>(3) foster good relations between different groups</b></p> <p>(see guidance notes)</p>		<p><b>2. What is the level of impact on each group/protected characteristics in terms of the three aims of the duty? Please indicate high (H) medium (M), low (L), no effect (N) for each.</b></p>	<p><b>3. Identify the risk or positive effect that could result for each of the group/protected characteristics?</b></p>		<p><b>4. If there is a disproportionately negative impact what mitigating factors have you considered?</b></p>
<p><b>Protected characteristics</b></p>		<p><b>Age</b></p>	<p><b>Risks</b></p>	<p><b>Positive effects</b></p>	
			<p>L</p>		<p>The proposal will provide a new school building to accommodate pupils aged 3-11 within the school building.</p>
	<p>L</p>		<p>The new school building will be fully DDA compliant ensuring full accessibility for all.</p>		
	<p>N</p>	<p>Neutral</p>			
	<p>N</p>	<p>Neutral</p>			

<b>Religion/Belief</b>	N	Neutral		
<b>Pregnancy and maternity</b>	N	Neutral		
<b>Sexual Orientation</b>	N	Neutral		
<b>Sex</b>	N	Neutral		
<b>Welsh language</b>	N	Neutral		
<b>Any other area</b>	N	Neutral		

<b>5. Has there been any consultation/engagement with the appropriate protected characteristics?</b>	<b>YES</b> <input checked="" type="checkbox"/> <b>NO</b> <input type="checkbox"/> The Project Officer has liaised with the Headteacher, Staff and Parents of Ysgol Gynradd Mynyddygarreg and Ysgol Gymraeg Gwenllian with regards to the proposal. All stakeholders will be fully consulted during the formal consultation period.
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**6. What action(s) will you take to reduce any disproportionately negative impact, if any?** Ensure that all key stakeholders are fully informed throughout the statutory process.

**7. Procurement**  
 Following collation of evidence for this assessment, are there any procurement implications to the activity, proposal, service. N/A  
 Please take the findings of this assessment into your procurement plan. Contact the corporate procurement unit for further advice.

**8. Human resources**  
 Following collation of evidence for this assessment, are there any Human resource implications to the activity, proposal or service? As there will be an increase in capacity, additional staffing may be required. However, this will be addressed as the scheme progresses and Human Resources will be fully consulted.

<b>9. Based on the information in sections 2 and 6, should this function/policy/procedure/practice or a decision proceed to Detailed Impact Assessment?</b> (recommended if one or more H under section 2)	<b>YES</b> <input type="checkbox"/>	<b>NO</b> <input checked="" type="checkbox"/>
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<b>Approved by:</b> Head of Service	Simon Davies	<b>Date:</b> October 2020
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## EXECUTIVE BOARD

21<sup>ST</sup> DECEMBER 2020

### MODERNISING EDUCATION PROGRAMME

### PROPOSAL TO CHANGE THE AGE RANGE OF SWISS VALLEY PRIMARY SCHOOL FROM 4-11 TO 3-11

#### Recommendations/key decisions required:

It is recommended that the Executive Board approves:

1. The proposal as outlined below and in the attached consultation document;
2. Officers to initiate formal consultation on the proposal;
3. That a report is submitted to the Executive Board at the end of the consultation period.

#### Reasons:

To comply with statutory procedures and guidance in relation to school re-organisation.

#### Relevant Scrutiny Committee Consulted:

YES – 23/11/2020

The Education and Children Scrutiny Committee unanimously resolved:

1. that the proposal to change the age range of Swiss Valley Primary School from 4-11 to 3-11 from 1<sup>st</sup> September, 2021, as detailed in the report, be endorsed;
2. that it be recommended to the Executive Board that a formal consultation process be initiated.

#### Council Decision Required:

NO

#### EXECUTIVE BOARD MEMBER PORTFOLIO HOLDER:

Cllr. Glynog Davies (Education & Children)

#### Directorate:

Education & Children

#### Designations:

Head of Access to Education

#### Tel Nos./E-mail Addresses:

01267 246471

[SiDavies@carmarthenshire.gov.uk](mailto:SiDavies@carmarthenshire.gov.uk)

#### Name of Head of Service:

Simon Davies

#### Report Author:

Sara Griffiths

Modernisation Team Manager

01267 226618

[SMGriffiths@carmarthenshire.gov.uk](mailto:SMGriffiths@carmarthenshire.gov.uk)

# EXECUTIVE SUMMARY

EXECUTIVE BOARD  
21<sup>ST</sup> DECEMBER 2020

## MODERNISING EDUCATION PROGRAMME PROPOSAL TO CHANGE THE AGE RANGE OF SWISS VALLEY PRIMARY SCHOOL FROM 4-11 TO 3-11

### Background

Ysgol Swiss Valley has been undertaking a pilot scheme to become a 3-11 school since 2013 which was initiated as part of a Welsh Government scheme to give parents flexibility and choice regarding nursery provision. However, as the school is currently advertised officially as a 4-11 school, parents are unaware or confused in regard to what nursery provision the school offers.

The proposal aims to provide equal provision within the Llanelli area, aligning Ysgol Swiss Valley with neighbouring schools that are already 3-11 schools. The governing body and head teacher are positive with the outcome of the pilot scheme and now wish to proceed with officially making the school a 3-11 school through statutory process.

### The Proposal

The proposal is to change the age range of Swiss Valley Primary School from 4-11 to 3-11 from 1<sup>st</sup> September, 2021.

### Recommendation

It is recommended that the Executive Board approves to proceed with the proposal as outlined above and a formal consultation be initiated.

**DETAILED REPORT ATTACHED?**

**YES: Draft Consultation Document**

## IMPLICATIONS

I confirm that other than those implications which have been agreed with the appropriate Directors / Heads of Service and are referred to in detail below, there are no other implications associated with this report:

Signed:  Head of Access to Education

Policy, Crime & Disorder and Equalities	Legal	Finance	ICT	Risk Management Issues	Staffing Implications	Physical Assets
<b>YES</b>	<b>YES</b>	<b>YES</b>	<b>NONE</b>	<b>YES</b>	<b>YES</b>	<b>NONE</b>

**1. Policy, Crime & Disorder and Equalities**

Developments are consistent with the Authority's Corporate Strategy and the Modernising Education Strategic Outline Programme as well as the Children and Young People's Plan.

**2. Legal**

Appropriate consultation will need to be initiated in accordance with the relevant statutory procedures.

**3. Finance**

Revenue implications will be catered for within the Local Management of Schools Fair Funding Scheme.

**4. ICT**

None.

**5. Risk Management Issues**

The proposal may impact on the demand for school places at the school and surrounding catchment area schools. The situation will be monitored as part of the school admission process and ongoing data forecasting and analysis through the Authority's Modernising Education Programme.

**6. Staffing Implications**

Staffing implications will be addressed in accordance with the County Council's Policy and Procedures.

**7. Physical Assets**

None.

## CONSULTATIONS

I confirm that the appropriate consultations have taken in place and the outcomes are as detailed below:

Signed:  Head of Access to Education

1. **Scrutiny Committee** – Consulted on 23/11/2020.
2. **Local Member(s)** - The local member is aware of the proposal and will be consulted during the formal consultation period.
3. **Community / Town Council** - Will be consulted during the formal consultation period.
4. **Relevant Partners** - Will be consulted during the formal consultation period.
5. **Staff Side Representatives and other Organisations** - Will be consulted during the formal consultation period.

**EXECUTIVE BOARD PORTFOLIO  
HOLDER AWARE/CONSULTED**

YES

### Section 100D Local Government Act, 1972 – Access to Information List of Background Papers used in the preparation of this report:

Title of Document	File Ref No./Locations that the papers are available for public inspection
Stage 1 (Permission to Consult) – ECS Scrutiny Committee Report	<a href="#">Education &amp; Children Scrutiny Committee on Monday, 23rd November, 2020, 10.00 am (gov.wales)</a>
MEP Biennial Review	<a href="http://www.carmarthenshire.gov.uk">www.carmarthenshire.gov.uk</a> Executive Board 20 <sup>th</sup> June 2016
21 <sup>st</sup> Century Schools Website	<a href="http://www.21stcenturyschools.org">www.21stcenturyschools.org</a>
School Organisation Code 2018	<a href="#">School Organisation Code 2018</a>



# Proposal to Change the Age Range of Ysgol Swiss Valley from 4-11 to 3-11

## Consultation Document

**DRAFT**

[carmarthenshire.gov.wales](http://carmarthenshire.gov.wales)



## **School Modernisation Section**

**Sara Griffiths**, Modernisation Team Manager

If you require this information in large print, Braille or on audiotape please contact the Department for Education & Children

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**Telephone:** 01267 246618

## Foreword

As part of its statutory obligation to keep the number and type of school places under review, the County Council has adopted a wide-ranging programme designed to improve school buildings and enhance opportunities for learning. The strategy reflects the vision and policies established by the County Council which embrace the requirement to deliver services, to clear standards – covering both cost and quality – by the most economic and effective means. In our drive to continually improve on the services made available to all learners, we must maximise the finite resources available to the Council, and continue to work in partnership with all those who have a contribution to make to the process of learning and the wellbeing of both children and their families. Schools of the future will need to serve as a focus for a wide range of services dedicated to serving the needs of the community through a joined-up approach.

Carmarthenshire is blessed with many very able education leaders and teachers but the continuing changes to the curriculum places a heavy demand on their skills to meet the wide-ranging demands of all children. Although the processes of learning, and skills of teaching, are extremely important, deep subject knowledge on the part of the teacher is essential if learners with their various gifts in different areas are to discover and develop their talents to the full.

Schools designed to meet current demands are expected to provide a broad and balanced curriculum through high quality and inspirational teaching. In the planning of new provision it will be important to ensure that our schools are properly equipped to enhance opportunities for social inclusion, sustainable development, equal opportunities and bilingualism. In practical terms we need to ensure that provision reflects the changing patterns of population, with schools based in the right location with accommodation and facilities fit to serve the needs of all learners in the twenty first century.

Consultation will follow the guidelines established by the Welsh Government and will involve identified interested parties. The information set out in this document is intended to clarify the proposals for your school and support the consultation process.



**Gareth Morgans**

Director of Education and Children

## Glossary of Abbreviations

<b>ALN</b>	Additional Learning Needs
<b>AN</b>	Admission Number
<b>CCC</b>	Carmarthenshire County Council
<b>CP</b>	Community Primary
<b>DS</b>	Dual Stream
<b>EM</b>	English medium
<b>Estyn</b>	Her Majesty's Inspectorate for Education and Training in Wales
<b>FTE</b>	Full Time Equivalent
<b>LA</b>	Local Authority
<b>MCSW</b>	Measuring the Capacity of Schools in Wales
<b>MEP</b>	Modernising Education Programme
<b>NOR</b>	Number on Roll
<b>PLASC</b>	Pupil Level Annual School Census Data
<b>PT</b>	Part-Time
<b>WESP</b>	Welsh in Education Strategic Plan
<b>WG</b>	Welsh Government
<b>WM</b>	Welsh Medium

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## Introduction

Carmarthenshire County Council has a legal responsibility to review the number and type of schools it has in the area and whether or not it is making the best use of the resources and facilities to deliver the opportunities that children deserve.

As part of this process the Council has published its vision on how it sees the future for all of the primary schools in the County and this includes consulting on the future shape of education in Ysgol Swiss Valley. The proposals for change included in this document are in line with that long-term objective.

This document seeks to stimulate the process of consultation by explaining the Authority's preferred option for the future provision of primary education for the pupils of **Ysgol Swiss Valley**. The document offers an opportunity for consultees to put forward any comments, observations or alternative proposals they wish to be considered.

Consultation on this proposal will follow the guidelines established by the Welsh Government and will involve identified interested parties.

The main purpose of this document is to provide information and to gather the views of identified interested parties.

## School Subject to Proposal

<b>School Name</b>		Ysgol Gynradd Swiss Valley
<b>School Location</b>		SA14 8DS
<b>County</b>		Carmarthenshire
<b>Age Range</b>		4-11
<b>School Category</b> (Community [C], Voluntary Aided [VA], Voluntary Controlled [VC])		Community
<b>Language Medium Category (PLASC)</b>		English with Significant Welsh
<b>Number of registered Pupils (January 2020)</b>	<b>Nursery</b>	14
	<b>Reception – Y.6</b>	222
	<b>Total</b>	<b>236</b>
<b>Number of pupils previously on the register</b>	<b>January 2019</b>	20 + 212 = <b>232</b>
	<b>January 2018</b>	19 + 217 = <b>236</b>
	<b>January 2017</b>	16 + 223 = <b>239</b>
	<b>January 2016</b>	22 + 216 = <b>238</b>
<b>Pupil Projections</b>	<b>January 2021</b>	240
	<b>January 2022</b>	246
	<b>January 2023</b>	241
	<b>January 2024</b>	238
	<b>January 2025</b>	242
<b>Capacity (including nursery)</b>		243
<b>Cost per pupil (2020/21)</b>		£3,573
<b>School Budget</b>		£870K
<b>Estyn Inspection Result</b>		<a href="#">Estyn</a>
<b>Building Condition Category</b>		B

## Background

Carmarthenshire County Council is committed to providing each child with the best possible start in life and meeting the aspirations of Welsh Government as set out in their strategic documents e.g. *Building a Brighter Future: The Early Years and Childcare Plan*, *Qualified for life: An education improvement plan*.

The provision of high-quality early years education is key to realising this ambition. Childhood experiences play a significant role in shaping our futures and are critical to the chances of leading a healthy, prosperous and fulfilling life. Carmarthenshire County Council aims to ensure that every child has access to the same, high quality support within schools.

The Welsh Government's launch of Early Childhood Education and Care Approach recognises that by the age of three, children from disadvantaged backgrounds can be as much as a year behind their peers. This attainment gap widens by the time children enter school. Therefore, it is the responsibility of local authorities to redress this imbalance and close the gap by providing access to quality early childhood provision.

Ysgol Swiss Valley is categorised as an English with Significant Welsh medium primary school for 4-11 year olds within the Llanelli area. Ysgol Swiss Valley has been undertaking a pilot scheme to become a 3-11 school since 2013 which was initiated as part of a Welsh Government scheme to give parents flexibility and choice regarding nursery provision. However, as the school is currently advertised officially as a 4-11 school, parents are unaware or confused in regard to what nursery provision the school offers.

## Current position within Carmarthenshire

Designated early years provision is offered in **40 schools** across the County. Carmarthenshire currently has a total of 96 primary schools.

Ysgol	Age Range
Betws	3-11 years
Bigyn	3-11 years
Bro Brynach	3-11 years
Bryn	3-11 years
Bryn Teg	3-11 years
Brynaman	3-11 years
Brynsierfel	3-11 years
Burry Port	3-11 years
Bynea	3-11 years
Cross Hands	3-11 years
Dafen	3-11 years
Dewi Sant	3-11 years
Gymraeg Ffwrnes	3-11 years
Griffith Jones	3-11 years



Gwenllian	3-11 years
Halfway	3-11 years
Johnstown	3-11 years
Llandeilo	3-11 years
Llandybie	3-11 years
Llangain	3-11 years
Llangennech	3-11 years
Llangynnwr	3-11 years
Maes y Morfa	3-11 years
Model	3-11 years
Myrddin	3-11 years
Nantgaredig	3-11 years
Parc y Tywyn	3-11 years
Pembrey	3-11 years
Pen Rhos	3-11 years
Penygaer	3-11 years
Pwll	3-11 years
Richmond Park	3-11 years
St Mary's Llanelli	3-11 years
St Mary's Carmarthen	3-11 years
Stebonheath	3-11 years
Teilo Sant	3-11 years
Trimsaran	3-11 years
Ysgol y Bedol	3-11 years
Y Castell	3-11 years
Y Dderwen	3-11 years

This document sets out the proposal to formally change the age range of Ysgol Swiss Valley from 4-11 to 3-11, to enable the incorporation of nursery provision into the school.

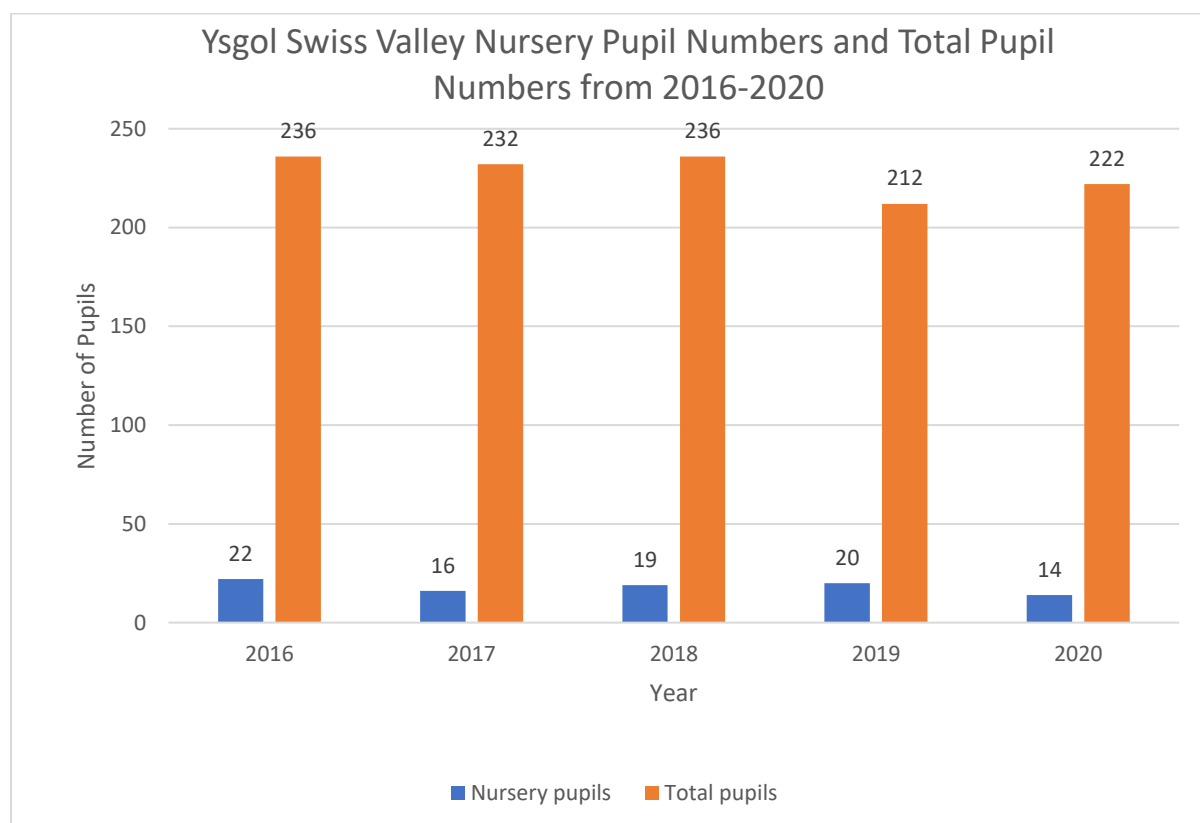
The County Council has a legal duty to look at the number and type of schools it has in Carmarthenshire and is required to make sure that they are located in the right place, have the right facilities for the future and have the right resources to deliver education and learning for pupils. We think that both our pupils and staff deserve nothing less.

Changes in the curriculum and the way in which children will be taught in the future also means that we have to look at whether or not, it is possible to review the age range of its schools to meet the future needs of the pupils.

## Rationale for Change

The proposal to change the age range of Ysgol Swiss Valley from 4-11 to 3-11 has been prepared in response to feedback received from the school and parents of pupils within the school, regarding the current pilot scheme of becoming a 3-11 school. Parents are currently unaware and confused in regard to what provision the school is offering for nursery pupils, due to the school being officially advertised as a 4-11 school. The proposal aims to provide equal provision within the Llanelli area, aligning Ysgol Swiss Valley with neighbouring schools that are already 3-11 schools. The outcomes of the pilot scheme have been positive and the Local Authority now wish to proceed with a proposal to change the age range of the school to 3-11 through formal consultation.

Nursery Pupil Numbers have been remaining fairly consistent since 2016:



## Pupil Capacity Information

	Jan 2020 (Actual Number)	Jan 2021	Jan 2022	Jan 2023	Jan 2024	Jan 2025
Projected Pupil Numbers	14 + 222 = <b>236</b>	240	246	241	238	242
Capacity (Nursery + Primary)	30 + 213 = <b>243</b>	30 + 213	30 + 213	30 + 213	30 + 213	30 + 213
Surplus	7	3	-3	2	5	1

## The Proposal

To change the age range of Ysgol Swiss Valley from a 4-11 school to a 3-11 school from 1<sup>st</sup> September, 2021.

### Advantages and Disadvantages of the proposal

#### Advantages

- Seamless transition from nursery into primary school.
- Parental confusion on what provision the school offers will be removed, as the school will be officially advertised as a 3-11 school.
- Gradual and supported transition for 3-year olds entering school, starting with half days and progressing to full school days.
- Opportunity for employment at Ysgol Swiss Valley.
- Standardisation of nursery provision in Llanelli area as Bryn, Dafen, Llangennech and Dewi Sant are already offering 3-11 provision.
- Reducing the attainment gap of 3-year olds from disadvantaged backgrounds.

#### Disadvantages

- Reduction in the demand for places at the privately-run nurseries and childminders who currently provide provision.
- Unemployment due to the lack of demand at the private run nurseries and childminders.

### Risks and Counter Measures

	Risk	Counter Measure
1.	Failure to obtain statutory approval to implement the proposal	Follow guidelines set out in the School Organisation Code 2018
2.	Integration of pupils into the school	The authority will work with the pupils to ensure smooth transition and integration into the school.
3.	Effect on local economy through loss of numbers from private nursery providers resulting in possible job losses.	Consult with private providers openly and honestly in regard to the proposal.

## Alternate Options considered

<b>Status Quo no change to Ysgol Swiss Valley</b>	
<b>Advantages</b>	<b>Disadvantages</b>
No change to stakeholders	Pilot scheme can't continue indefinitely, therefore School will remain as a 4-11 school with no provision for 3-year olds.
No statutory process required	Parental confusion into what provision the school offers will continue

<b>Provide Nursery Provision at Neighbouring Schools</b>	
<b>Advantages</b>	<b>Disadvantages</b>
No change to stakeholders at Ysgol Swiss Valley	Statutory process required for neighbouring school.
3-year old provision will be offered at neighbouring schools.	Pilot scheme can't continue indefinitely, therefore School will remain as a 4-11 school with no provision for 3-year olds.
	Parental confusion into what provision the school offers will continue

<b>Provide Provision at Private Nurseries</b>	
<b>Advantages</b>	<b>Disadvantages</b>
Increased employment for private childcare workers.	Expensive for parents in paying for private nursery provision and therefore not tackling the attainment gap between 3-year olds from disadvantaged backgrounds.
No change to stakeholders	Parental confusion into what provision the school offers will continue
No statutory process required	Pilot scheme can't continue indefinitely, therefore School will remain as a 4-11 school with no provision for 3-year olds

## Staffing

Staffing arrangements will remain the same due to the current pilot scheme being in place, to support 3-year-old provision at the school.

## WESP

This proposal will support the school to improve the provision of Welsh medium education for pupils from 3 years old. The proposal will also support targets outlined in the LA's approved Carmarthenshire's Welsh in Education Strategic Plan 2017-2020

and supports Welsh Government's 'Cymraeg 2050: A Million Welsh Speakers' aim. It also supports the new county Welsh Language Targets set by WG for the 10-year Welsh in Education Strategic Plan.

## **Financial Implications - Revenue**

Ysgol Swiss Valley is funded in accordance with the County Council's Fair Funding policy and will receive resources on the same basis as any other school in the County Council, based on the new school's pupil numbers and facilities.

## **Admissions Arrangements**

The County Council is the Admissions Authority for Ysgol Swiss Valley:

The School Admissions Unit,  
Carmarthenshire Local Authority,  
Department for Education and Children,  
Block 2,  
Main Building,  
St. David's Park,  
Carmarthen. SA31 3HB  
Tel No: 01267 246449

E-mail: [admissions@carmarthenshire.gov.uk](mailto:admissions@carmarthenshire.gov.uk)

## **School Catchment Area**

Ysgol Swiss Valley will remain located on the current school site therefore the designated catchment area will be based on that of the existing Ysgol Swiss Valley.

## **Secondary School Transfers**

There will be no changes to the current transfer arrangements for pupils in respect of Secondary education.

## School(s) affected by this proposal

School Name		Ysgol Gynradd Swiss Valley	Ysgol Gynradd Llannon	Ysgol Gynradd Pum Heol	Ysgol Y Felin	Ysgol Gynradd Dafen	Ysgol Gynradd Gymunedol Bryn	Ysgol Gymraeg Llangennech	Ysgol Gymraeg Dewi Sant
School Location		SA14 8DS	SA14 6AE	SA15 5EX	SA14 8BE	SA14 8LL	SA14 9TT	SA14 8YB	SA14 8RS
County		Carmarthenshire							
Age Range		4-11	4-11	4-11	4-11	3-11	3-11	3-11	3-11
School Category (Community [C], Voluntary Aided [VA], Voluntary Controlled [VC])		Community	Community	Community	Community	Community	Community	Community	Community
Language Medium Category (PLASC)		English with Significant Welsh	Welsh Medium	Welsh Medium	Dual Stream	English Medium	English Medium	Welsh Medium	Welsh Medium
Number of registered Pupils (January 2020)	Nursery	14	3	7	17	24	25	57	79
	Reception – Y.6	222	96	80	205	130	189	371	392
	<b>Total</b>	<b>236</b>	<b>99</b>	<b>87</b>	<b>222</b>	<b>154</b>	<b>214</b>	<b>428</b>	<b>471</b>
Number of pupils previously on the register	January 2019	20 + 212 = 232	101	91	219	164	216	439	482
	January 2018	19 + 217 = 236	117	92	222	161	188	474	467

School Name		Ysgol Gynradd Swiss Valley	Ysgol Gynradd Llannon	Ysgol Gynradd Pum Heol	Ysgol Y Felin	Ysgol Gynradd Dafen	Ysgol Gynradd Gymunedol Bryn	Ysgol Gymraeg Llangennech	Ysgol Gymraeg Dewi Sant
	January 2017	16 + 223 = 239	116	95	226	163	206	211/238	440
	January 2016	22 + 216 = 238	115	90	224	141	201	2213/236	434
Pupil Projections	January 2021	240	95	88	218	156	222	421	465
	January 2022	246	92	95	220	160	226	414	458
	January 2023	241	95	96	217	158	215	408	458
	January 2024	238	96	94	217	162	220	400	467
	January 2025	242	94	93	215	160	223	404	464
Capacity (including nursery)		243	112	101	240	163	255	480	419
Cost per pupil (2020/21)		£3573	£3730	£3688	£5125	£3707	£3792	£3680	£3357

School Name	Ysgol Gynradd Swiss Valley	Ysgol Gynradd Llannon	Ysgol Gynradd Pum Heol	Ysgol Y Felin	Ysgol Gynradd Dafen	Ysgol Gynradd Gymunedol Bryn	Ysgol Gymraeg Llangennech	Ysgol Gymraeg Dewi Sant
School Budget	£870K	£369K	£321K	£1,338K	£550K	£781K	£1,524K	£1,504K
Estyn Inspection Result LINK	<a href="#">Estyn</a>	<a href="#">Estyn</a>	<a href="#">Estyn</a>	<a href="#">Estyn</a>	<a href="#">Estyn</a>	<a href="#">Estyn</a>	(No Report)	<a href="#">Estyn</a>
Building Condition Category	B	B	C	B	C	A	C	C

### Private Nursery Providers (within 1 mile)

Name of Nursery	Type of Provision
Camau Tirion	Full Day Care
Brambly Hill Day Nursery	Full Day Care
Sarah Steadman	Childminder
Inky Pinky	Childminder
Swiss Valley Childminding	Childminder



## Evaluation of Present Arrangements

### Standards

On entry to the school, most pupils' skills are at the expected level for their age. Throughout the school, most pupils develop good oracy skills and listen well. In the foundation phase, most read a broad range of texts with good understanding. They pronounce unfamiliar words well, using phonic strategies and identify sounds and words that relate to different characters in stories. They are able to talk about and describe their favourite characters in their books confidently. By the end of key stage 2, most pupils read a range of books successfully, with older pupils using their higher-order reading skills effectively.

Across the school, most pupils write well for different purposes and in a range of contexts. In the foundation phase, many write stories and poems well and these writing skills develop well for most pupils. However, occasionally the overuse of worksheets impedes the development of pupils' extended writing. Throughout the school, most pupils have positive attitudes to Welsh. In the foundation phase, pupils respond appropriately to instructions and reply to simple greetings confidently. By year 2, most use simple phrases and vocabulary successfully. By the end of key stage 2, many pupils ask and answer simple questions about their likes and dislikes and give a simple reason for their opinions. Many hold simple conversations with one another, using sentence patterns that they have rehearsed in Welsh lessons.

In the foundation phase, most pupils make good progress in developing their numeracy skills across the areas of learning. By the end of key stage 2, most pupils develop effective calculation strategies when tackling problems and confidently apply measuring, data and shape skills well. Many pupils use their reasoning skills skilfully. Many pupils develop their information and communication technology skills (ICT) well and their application of these skills develop well throughout the school. Most pupils understand how to search safely. Older pupils use databases confidently. Digital leaders (Tim Tec) have been instrumental in raising standards. These pupils use 'flipped' strategies to teach younger pupils a range of DCF friendly activities involving data handling and coding. New and developing technologies, such as drones, are being used to develop skills such as coding; and virtual reality headsets are used to give pupils experiences of environments that they would not otherwise be able to access. Google Classroom has been fully embedded in upper key stage 2 and this has developed improved skills in collaboration and independence. Most pupils develop their creative, problem solving and physical skills effectively during their time at Swiss Valley. They take an active part in a range of opportunities such as concerts, drama clubs, swimming, art competitions and girls' football.

Over time, by the end of the Foundation Phase, most pupils attain outcomes which are equal to or better than those predicted at their baseline assessment in language (LLCE), mathematical development (MDT) and personal development (PSD). However, in 2019, progress in MDT was not as strong and this is something the school is monitoring closely. Nearly all pupils made good progress in English, with most pupils making good progress in mathematics and science. Most more able pupils made very good progress in mathematics and science, with slightly fewer making similar progress in English. The school has recognised this is a key priority for monitoring. Nearly all

pupils made good progress in Welsh throughout their time at the school. Pupils engage well in the Siarter Iaith and make additional progress in upper key stage 2 through additional voluntary provision from a link governor. A few pupils use their Welsh skills around the school confidently.

The school has demonstrated over time that nearly all learners within specific groups make at least good progress as they move through the school. The end of key stage 2 data has demonstrated that all pupils eligible for FSM attain at least the expected level. There is little difference over time between the performance of boys and girls. The number of pupils with English as an additional language (EAL) is increasing, which is adding extra challenge to the school's context. More able pupils make very good progress and those pupils with sporting and creative talents excel within their fields.

## **Wellbeing**

Nearly all pupils feel safe in school and they know that they can speak to staff if they have any concerns or worries. Most pupils know how to keep themselves safe online. Most pupils have a thorough understanding of the importance of leading a healthy lifestyle. Nearly all pupils behave consistently well in lessons and at other times during the day. They move around the school in an orderly, calm manner. They are polite and considerate towards each other, staff and visitors. Most pupils show positive attitudes towards their work. They are enthusiastic learners who work harmoniously and stay on task over extended periods. Most pupils persevere well in lessons and show determination to learn new things. Most older pupils find appropriate ways to work through challenges. Pupils take their leadership roles very seriously and they talk enthusiastically about their work. Pupils take pride in the opportunities to support various charities and contribute to activities in the community. The attendance rate was 94.9% in 2018/19. The target for 2019-20 is 96% and the school is currently on track to achieve this. Most pupils respond well to the school's sustained focus on improving attendance and understand the importance of attending school regularly. Most are punctual at the start of the school day. However, term time holidays still provide a challenge to the school's overall attendance.

## **Teaching and Learning Experiences**

A range of learning experiences ensures that all pupils are challenged and fully engaged. Memorable experiences and rich opportunities promote high quality learning and wellbeing. The principles of the Foundation Phase are fully adhered to and curriculum planning involves access to focused tasks, enhanced and continuous provision including access to a wide range of outdoor and indoor experiences. Working relationships between staff and pupils are very positive. Teachers create a purposeful learning environment in which pupils feel confident to ask questions and share ideas. Teachers manage pupils' behaviour effectively in lessons and, as a result, nearly all pupils are very respectful and attentive, supporting each other well in their learning.

Most teachers share learning objectives well with pupils and provide clear instructions that enable pupils to undertake their tasks confidently. They plan tasks and activities to meet the needs of pupils successfully and make effective use of plenary sessions to evaluate pupils' learning. There are well-planned opportunities to develop pupils' literacy, numeracy and ICT skills in a wide range of contexts across the curriculum,

including local and national contexts. Involvement in the Siarter Cymraeg Campus has re-focused the whole school and has helped to ensure that the school has a continuing bilingual ethos and environment. Teaching assistants support pupils very well and display strong professional initiatives to enable those pupils with additional learning needs to work effectively.

Teachers use questioning techniques purposefully to help pupils understand new ideas and to develop their knowledge and skills. Oral and written feedback helps pupils to know what they need to do to address weaknesses in their work. Opportunities for pupils to assess and reflect on their own performance and that of others are developing appropriately. The school reflects on the effectiveness of the curriculum regularly and takes good account of developments towards the new curriculum for Wales. However, teachers do not always provide enough opportunities for pupils to take greater responsibilities for their learning. Where teaching is less effective, leaders take swift action to ensure that lesson objectives and differentiation are improved to maximise the progress for all learners.

### **Care, Support and Guidance**

The school has robust systems in place to assess and track pupil progress. Staff use the comprehensive range of assessment data competently in order to identify pupils who would benefit from various intervention programmes. Assessments are valid, accurate and reliable across the school. The additional learning needs coordinator monitors and supports pupils with additional needs effectively. There is a comprehensive provision map in place which ensures that all members of staff have a detailed awareness of the support that individual pupils and groups of learners require. Teachers produce useful individual education plans that include suitable targets for improvement. Pupils and teachers, together with parents, regularly review progress against the individual targets.

### **Leadership and Management**

Leaders and staff have developed a shared vision and there is a very clear strategy that has improved outcomes for nearly all learners. Leaders demonstrate a very strong capacity to plan and implement change and sustain improvement successfully in nearly all respects. They engage all staff and other partners very effectively in the change process. Self-evaluation is accurate, robust, systematic and well established. Self-evaluation is highly effective in contributing to improving standards, learning and teaching.

All leaders and nearly all staff are highly effective in their analysis and use of the available performance data and evidence about the quality of learning and teaching and pupils' work to identify strengths and set improvement priorities. Leaders and staff have a relentless focus on raising standards. Targets reflect high expectations for the future achievement of all pupils, and these are met consistently in nearly all cases. The school has a very good track record in raising the achievement of nearly all pupils, including vulnerable learners over at least a three-year period. Improvement planning at all levels is highly effective in addressing the areas in need of most improvement. Action, including the use of resources, has led to sustained improvement in outcomes

in key indicators for nearly all pupils, including those eligible for free school meals and other vulnerable groups.

The school gives good attention to national and local priorities and in general implements these effectively to improve standards and the quality of learning and teaching. Leaders and staff work very successfully with schools and other partners to enhance significantly their own and others' capacity to bring about improvement. Governors have a good understanding of the school's strengths and areas for improvement. Their work to support and challenge the school's performance is strong. However, a further increase in involvement in monitoring and planning across a greater number of governors would strengthen this important area. Leaders and staff have well defined roles and responsibilities and exhibit high professional standards. The school's leaders and governors give a high priority to developing the workforce: performance management and professional development are highly successful in improving pupils' progress and classroom practice. Governors and leaders deal with underperformance appropriately.

The quality of teaching across the school, and the impact on nearly all pupils' learning and progress, is consistently good and often excellent. Most staff have a shared understanding of the characteristics of excellent and good teaching and demonstrate these in classroom practice. Processes to lead, identify, validate and share effective practice achieve continuous improvement in the quality of learning and teaching across the school as a whole. Processes to track pupils' progress, identify needs and provide support are robust and effective in nearly all cases. Teacher assessment is consistent and accurate.

Overall, Swiss Valley is a well-led school that has a very good track record of improving learners' academic progress and wellbeing. Despite the reduction in the number of senior leaders, leadership across the school is strong. Leadership capacity at the school relies on the goodwill and significant experience of the staff. This needs to be addressed by governors and the local authority to secure the future direction and leadership of the school.

### **Impact of the Proposal**

The change from 4-11 to 3-11 at Swiss valley will help secure and possibly strengthen pupil numbers in years to come.

## The Consultation Process

The consultation on this proposal will follow guidelines established by the Welsh Government as stated in the School Organisation Code (2018).

### Who will be consulted?

This document will be sent to the following interested parties:

Staff (Teaching and Ancillary)	Director of Education – All Neighbouring Authorities
Governors and Parents/Guardians	Diocesan Director of Education Church in Wales and RC
Local County Councillors	Estyn
Community Councillors	Regional Transport Consortium
Member of the Senedd (MS) / Regional Members / Members of Parliament (MP)	Neighbouring Primary and Secondary schools
Welsh Ministers	All relevant unions
SEN Partners	Welsh Language Commissioner
LA Special Educational Needs Division	Local Police and Crime Commissioner
ERW – Education through Regional Working	Flying Start
	Child Care / Early Years/Private Providers
Communities for Work +	Public Services Board
Communities for Work	Legacy
Fusion	Families First Carmarthenshire

***\*Copies of the consultation document will be sent to the Head teacher and Chair of Governors of the surrounding catchment area of school's subject to proposals.***

## Consultation Period

The consultation period for the proposals starts on 11<sup>th</sup> January, 2021 and ends on 21<sup>st</sup> February, 2021.

Consultees can submit their views in favour of or against a proposal. Responses received during the consultation period will not be treated as statutory objections. If consultees wish to object, they will need to do so in writing during the statutory objection period outlined on pages 18/19.

### Considering your views

During the consultation period you can ask questions and express your views by writing a letter to the address below or by completing an online survey using the following link:

[Insert Link](#)

Letters should be sent to the following address by no later than noon on 21<sup>st</sup> February, 2021.

Mr Gareth Morgans, Director of Education and Children,  
Building 2, St. David's Park, Jobs Well Road, Carmarthen, SA31 3HB  
Or E-mail to: [DECMEP@carmarthenshire.gov.uk](mailto:DECMEP@carmarthenshire.gov.uk)

### Drop in sessions

Due to the ongoing implications of the Coronavirus issue we have been advised to postpone all events where there is interaction between staff, parents and the wider community and as a result there will not be a drop in session to discuss proposals. Should you feel strongly about discussing the proposals please contact Mrs Rhianydd Evans by sending an e-mail to [DECMEP@carmarthenshire.gov.uk](mailto:DECMEP@carmarthenshire.gov.uk) and a virtual meeting can be arranged.

### Consultation with Pupils

There will be an opportunity for the pupils of the school's subject to the proposals to participate in the consultation process during a session which will be conducted at the schools.

The information gathered from the consultation with pupils will form part of the consultation report which will be submitted to the Executive Board for consideration following the consultation period.

## **Consultation Report**

A Consultation Report will be published on Carmarthenshire County Council's website at least 2 weeks before a decision is made on whether or not to proceed to publish a statutory notice. Hard copies of the report will also be available on request. The report will summarise the issues raised by consultees and provide Carmarthenshire County Council's response to these issues. The report will also contain Estyn's view of the proposal and details of consultation undertaken with the pupils.

The Executive Board of Carmarthenshire County Council will consider the consultation report and decide whether or not to proceed with the proposal.

If the Executive Board decides to continue with the proposal Carmarthenshire County Council must publish a statutory notice.

## **Statutory Notice**

The statutory notice will be published on Carmarthenshire County Council's website and posted at the school's subject to proposals. Copies of the notice will be made available to the schools to distribute to pupils, parents, guardians, and staff members (the schools may also distribute the notice by email).

### **Statutory Objection Period**

The statutory notice will set out the details of the proposal and invite anyone who wishes to object to do so in writing within a period of 28 days. If objections are received an objection report will be published on the Carmarthenshire County Council website. Hard copies of the report will also be available on request. The report will summarise the issues raised and provide Carmarthenshire County Council's response to those objections.

## **Determination of Proposal**

Carmarthenshire County Council will determine the proposal. The County Council may decide to approve, reject or approve the proposal with modifications. In doing so, the County Council will take into account any statutory objections that it received.

### **Decision Notification**

Following determination of proposals all interested parties will be informed and advised of the availability of the decision which will be published electronically on Carmarthenshire County Council's website.

## The Statutory Process Time-Table

The statutory process and timetable will be as follows:

11 <sup>th</sup> January, 2021	Issue of this consultation document to identified and other interested parties.
21 <sup>st</sup> February, 2021	Closing date for views on the proposal to be received by the Department for Education and Children.
27 <sup>th</sup> April, 2021	<p>A Consultation Report will be taken to the Executive Board for a decision on whether or not to proceed to publish a statutory notice. OR alternatively proposal ends.</p> <p>The Consultation Report will be published on Carmarthenshire County Council's website at least 2 weeks prior to the publication of a statutory notice.</p> <p>If the decision is made to proceed then a statutory notice will be published. The notice will outline details of the proposal and be published on the Council's web site and be displayed near the entrance of the school and schools which are subject to the proposals. Copies of the notice will be made available to the school to distribute to parents, guardians and staff members.</p> <p>Following publication there will be a 28 day period during which time formal written objections will be invited.</p> <p>The statutory notice will give details on how you may record your objections to the proposal.</p>
8 <sup>th</sup> June, 2021	End of formal 28 day notice period for objections. County Council will determine the proposal. The County Council may decide to approve, reject or approve the proposal with modifications, in doing so the County Council will take into account any statutory objections received.
July, 2021	<p>Deadline to notify parents of intention to implement proposal.</p> <p>Following determination of proposals all interested parties will be informed and advised of the availability of the decision which will be published electronically on Carmarthenshire County Council's website.</p>



## **Appendix A – Community Impact Assessment**

### **Ysgol Swiss Valley**

#### **Catchment Area Analysis – January PLASC 2020 Data**

Each school has an area that it serves, referred to as the catchment area. Each school is expected to accommodate pupils from within its catchment area and schools must have regard for this ongoing demand.

Most parents send their child to their local school, but parents have a right to state a preference for other schools.

#### **Pupils attending the school from inside / outside the catchment**

Based on January PLASC 2020 data, the geographical data in relation to the pupil distribution for Ysgol Swiss Valley catchment area indicated that of the 236 pupils on roll, 108 lived within the catchment area, whilst the remaining 128 were from outside the catchment area.

#### **Pupils living in the catchment area attending other schools.**

Based on January PLASC 2020 data, 78 pupils lived within the Ysgol Swiss Valley catchment area attended other schools.

Taking into consideration the 108 pupils living within the catchment area attending Ysgol Swiss Valley, and the 78 pupils living within the catchment area but attending other schools, a total of 186 pupils are living within the catchment area of Ysgol Swiss Valley.

#### **Other facilities or services provided by the school e.g. after school clubs/ community Library**

Ysgol Swiss Valley currently offers private wrap around care on site for nursery pupils, as well as a breakfast club 7:30-8:45 and an after-school club 15:10-18:00. A holiday club is also provided during school holidays.

#### **Community Impact**

If approved, the proposal will increase educational provision for 3-year olds within the area of Ysgol Swiss Valley; contributing to the Welsh Government's Early years education and care approach in creating high-quality child-centred provision within the early years.

## Appendix B – Welsh Language Impact Assessment

### Ysgol Swiss Valley

Carmarthenshire County Council's vision is to provide a service, which will ensure access to high quality learning opportunities for all children, young people and adults, this enabling the achievement of their full potential within the context of the unique bilingual nature of the county.

#### **Standards\***

Ysgol Swiss Valley is categorised as an English with significant use of Welsh school.

In Key stage 2 pupils are assessed in each of the core subjects. Based on 2019 data, 100% of pupils achieved at least level 4 in Welsh as a second language whilst 44.8% achieved at least Level 5.

#### **After school activities which provide additional opportunities to use the Welsh language**

There are currently no additional after school opportunities for learning Welsh.

*(\* No National Teacher Assessments were conducted in 2020 due to the ongoing impact of the Coronavirus outbreak. For this reason, 2019 has been used.)*

## Appendix C – Equalities Impact Assessment

### Carmarthenshire County Council Assessing Impact

#### The Equality Act 2010

The Equality Act 2010 (the Act) brings together and replaces the previous anti-discrimination laws with a single Act. It simplifies and strengthens the law, removes inconsistencies and makes it easier for people to understand and comply with it. The majority of the Act came into force on 1 October 2010.

The Act includes a new public sector equality duty (the 'general duty'), replacing the separate duties on race, disability and gender equality. This came into force on 5 April 2011.

#### What is the general duty?

The aim of the general duty is to ensure that public authorities and those carrying out a public function consider how they can positively contribute to a fairer society through advancing equality and good relations in their day-to-day activities. The duty ensures that equality considerations are built into the design of policies and the delivery of services and that they are kept under review. This will achieve better outcomes for all.

The duties are legal obligations. Failure to meet the duties may result in authorities being exposed to legal challenge.

Under equality legislation, public authorities have legal duties to pay 'due regard' to the need to eliminate discrimination and promote equality with regard to race, disability and gender, including gender reassignment, as well as to promote good race relations. The Equality Act 2010 introduces a new public sector duty which extends this coverage to age, sexual orientation, pregnancy and maternity, and religion or belief. The law requires that this duty to pay 'due regard' be demonstrated in the decision making process. It is also important to note that public authorities subject to the equality duties are also likely to be subject to the

obligations under the Human Rights Act and it is therefore wise also to consider the potential impact that decisions could have on human rights as part of the same process.

### **Carmarthenshire's approach to Equality Impact**

In order to ensure that the council is considering the potential equality impact of its proposed policies and practices, and in order to evidence that we have done so, every proposal will be required to be supported by the attached Equality Impact Assessment. Where this assessment identifies a significant impact then more detail may be required.

### **Reporting on assessments**

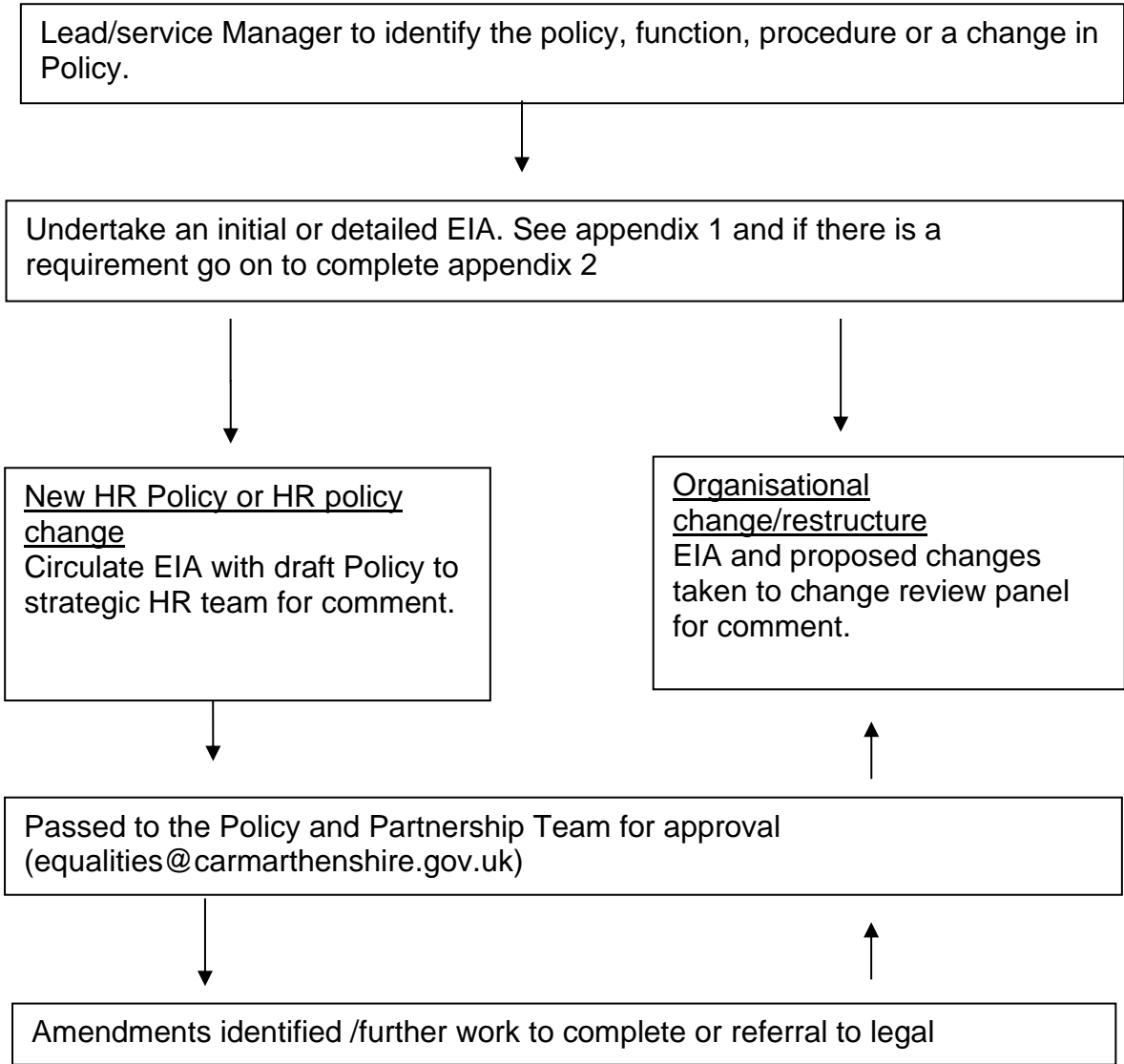
Where it is clear from the assessment that the likely impact on the authority's ability to meet the general duty is substantial, then it must publish a report.

### **Initial and Detailed Equality Impact Assessments**

The initial EIA (appendix 1) is a simple and quick method of assessing the effect of a policy, function, procedure, decision including financial cuts on one or more of the protected characteristics.

The Service Manager responsible for the relevant new or revised policies, functions, procedures and financial decisions must undertake, at least, an initial EIA and where relevant a detailed Equality Impact Assessment (appendix 2); EIA must be attached as background paper with reports to Executive and Scrutiny.

**Equality impact assessment – Process to follow where HR implications have been identified**



**Initial Equalities Impact Assessment Appendix 1**

<b>Department:</b> Education & Children	<b>Completed by (lead):</b> Sara Griffiths	<b>Date of initial assessment:</b> February 2020 <b>Revision Dates:</b> February 2021
<b>Area to be assessed: (i.e. name of policy, function, procedure, practice or a financial decision)</b>	This proposal is to change the age range of Swiss Valley Primary School from 4-11 to 3-11 through statutory process.	
<b>Is this existing or new function/policy, procedure, practice or decision?</b>	School Re-organisation Proposal – Modernising Education Programme	
<b>What evidence has been used to inform the assessment and policy? (please list only)</b>		
<ul style="list-style-type: none"> <li>• 21<sup>st</sup> Century Schools Programme</li> <li>• Modernising Education Programme</li> <li>• School Organisation Code 2018</li> <li>• PLASC Data 2020</li> <li>• The Well-being of Future Generations (Wales) Act 2015</li> </ul>		

<b>1. Describe the aims, objectives or purpose of the proposed function/policy, practice, procedure or decision and who is intended to benefit.</b>	The aim of the scheme is to provide the pupils and staff at Swiss Valley Primary School with part-time nursery provision by legally changing the age range that pupils are admitted from 4-11 to 3-11. The authority is seeking to standardise nursery provision within the Llanelli area. This will ensure a seamless transition of nursery pupils into primary school.		
<b>The Public Sector Equality Duty requires the Council to have “due regard” to the need to:-</b>	<b>2. What is the level of impact on each group/protected characteristics in terms of the three aims of</b>	<b>3. Identify the risk or positive effect that could result for each of the group/protected characteristics?</b>	<b>4. If there is a disproportionately negative impact what mitigating</b>

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<p>(1) eliminate unlawful discrimination, harassment and victimisation;  (2) advance equality of opportunity between different groups; and  (3) foster good relations between different groups  (see guidance notes)</p>		<p><b>the duty? Please indicate high (H) medium (M), low (L), no effect (N) for each.</b></p>	<p><b>Risks</b></p>	<p><b>Positive effects</b></p>	<p><b>factors have you considered?</b></p>
<p style="writing-mode: vertical-rl; transform: rotate(180deg);"><b>Protected characteristics</b></p>	<p><b>Age</b></p>	<p>L</p>		<p>The proposal will provide nursery age pupils with access to nursery provision within the school building ensuring a seamless transition from part-time to full-time education.</p>	
	<p><b>Disability</b></p>	<p>L</p>		<p>Nursery pupils with ALN will be accommodated and supported accordingly as and when required.</p>	

<b>Gender reassignment</b>	N	Neutral		
<b>Race</b>	N	Neutral		
<b>Religion/Belief</b>	N	Neutral		
<b>Pregnancy and maternity</b>	N	Neutral		
<b>Sexual Orientation</b>	N	Neutral		
<b>Sex</b>	N	Neutral		
<b>Welsh language</b>	L		The language category of the school will remain the same (EW) with significant use of welsh being promoted throughout the school.	
<b>Any other area</b>	N	Neutral		

5. Has there been any consultation/engagement with the appropriate protected characteristics?

YES

NO

The Project Officer will liaise with the Headteacher, Staff, Parents of Ysgol Swiss Valley pupils as well as private nurseries and childminders within the Swiss Valley area, with regards to the proposal. All stakeholders will be fully consulted during the formal consultation period.

6. What action(s) will you take to reduce any disproportionately negative impact, if any? Ensure that all key stakeholders are fully informed throughout the statutory process.



<b>7. Procurement</b>		
Following collation of evidence for this assessment, are there any procurement implications to the activity, proposal, service. N/A Please take the findings of this assessment into your procurement plan. Contact the corporate procurement unit for further advice.		
<b>8. Human resources</b>		
Following collation of evidence for this assessment, are there any Human resource implications to the activity, proposal or service? As there will be an increase in age-range, additional staffing may be required. This will be addressed as the scheme progresses and human resources will be fully consulted.		
<b>9. Based on the information in sections 2 and 6, should this function/policy/procedure/practice or a decision proceed to Detailed Impact Assessment?</b> (recommended if one or more H under section 2)	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
Approved by: Head of Service	Simon Davies	Date: October 2020

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## EXECUTIVE BOARD

21<sup>ST</sup> DECEMBER 2020

### MODERNISING EDUCATION PROGRAMME PROPOSAL TO REVIEW PRIMARY EDUCATION PROVISION IN THE BLAENAU AND LLANDYBIE AREAS

#### Recommendations / key decisions required:

It is recommended that the Executive Board approves:

1. The proposal as outlined below and in the attached consultation document;
2. Officers to initiate formal consultation on the proposal;
3. That a report is submitted to the Executive Board at the end of the consultation period.

#### Reasons:

To comply with statutory procedures and guidance in relation to school re-organisation.

#### Relevant Scrutiny Committee Consulted: Yes – 23/11/2020

The Education and Children Scrutiny Committee resolved:

- That the proposal to review Primary Education provision in the Blaenau and Llandybie areas, as detailed in the report be endorsed;
- That it be recommended to the Executive Board that a formal consultation process be initiated

#### Council Decision Required

NO

#### Executive Board Member Portfolio Holder: Cllr. Glynog Davies (Education & Children)

#### Directorate:

Education & Children

**Name of Head of Service:** Simon Davies

**Report Author:** Sara Griffiths

#### Designations:

Head of Access to Education

Modernisation Team Manager

#### Tel: Email addresses:

01267 246471

[SiDavies@carmarthenshire.gov.uk](mailto:SiDavies@carmarthenshire.gov.uk)

01267 246618

[SMGriffiths@carmarthenshire.gov.uk](mailto:SMGriffiths@carmarthenshire.gov.uk)

# EXECUTIVE SUMMARY

EXECUTIVE BOARD  
21<sup>ST</sup> DECEMBER 2020

## MODERNISING EDUCATION PROGRAMME

### PROPOSAL TO REVIEW PRIMARY EDUCATION PROVISION IN THE BLAENAU AND LLANDYBIE AREAS

#### Background

The Authority has a legal responsibility to review the number and type of schools it has in an area and whether it is making the best use of resources and facilities to deliver the opportunities that children deserve.

#### Ysgol Gynradd Blaenau

Ysgol Gynradd Blaenau is a Welsh medium, community primary school located in the village of Blaenau with capacity for 99 pupils aged between 4-11 years. In recent years, pupil numbers at the school have declined. January 2020 PLASC showed that there were 34 pupils at the school meaning that there were 65 surplus places, or 66%. Welsh Government through the School Organisation Code advises local authorities to review their provision where there are more than 10% surplus places in an area.

Whilst there are 44 pupils living within Ysgol Gynradd Blaenau's catchment area **only 8 of those pupils attend the school**, meaning that 36 pupils living within the school's catchment area attend other schools.

Based on current pupil projections (2020) it is estimated that the pupil figures will remain low in the foreseeable future. Additionally, Ysgol Gynradd Blaenau's building condition is 'poor' and the school has been in deficit since 2011/12 and remains with a deficit of £83,895 for 2019/20. Their original funding allocation for 2020/21 was £149k and their forecast position for the year is an increase to the deficit balance.

From an educational perspective having such a small number of pupils and mixed age classes makes it extremely difficult for the school to deliver the breadth and depth of curricular and social experiences which pupils of this age require to fully develop.

The culmination of these unavoidable facts presents a school model which does not represent a sound, stable educational model or best use of resources. With no prospect of there being a significant increase in pupil numbers for the foreseeable future consideration is required on the sustainability of the school.

## Ysgol Gynradd Llandybie

Ysgol Gynradd Llandybie is a transitional (working towards Welsh medium) 3-11 primary school located in the rural village of Llandybie approximately two miles north of the town of Ammanford in Carmarthenshire.

Ysgol Gynradd Llandybie is a successful school which by January 2019 had reached its capacity and although there was a slight decrease in pupils at January 2020 this trend is likely to continue for the foreseeable future based on current pupil projections (2020). As a result the Local Authority are developing a scheme to increase the capacity of Ysgol Gynradd Llandybie to 315 places with 45 nursery places by providing a new school with facilities fit for the 21<sup>st</sup> Century on a new site.

The project will re-locate Ysgol Gynradd Llandybie from its current site to a new site which is within the current catchment area of Ysgol Gynradd Llandybie. The new school will provide a Welsh Government standard primary school building with capacity to accommodate 315 pupils and 45 nursery pupils between the ages of 3-11 years old and ensure that the school is able to deliver the full curriculum in modern, safe and inspiring learning environments with enhanced outside areas.

This proposed investment will address poor building condition and lack of adequate space and provision in the existing school by providing a category **A** school with sufficient places for current and projected demand.

Over the last 5 years there has been a sustained increase in the number of pupils choosing to enter the Welsh medium stream and a fall in the number of pupils choosing to enter the English stream.

The Local Authority has a responsibility to provide all pupils with the best education possible and believes that providing bilingual opportunities has a role to play in this. This aligns with Carmarthenshire's Welsh in Education Strategic Plan 2017-2020's objective of **ensuring "that all pupils are able to speak, read and write the Welsh language fluently by the end of Key Stage 2 in accordance with their expected stage of development."** The best way to create confident, bilingual individuals is through immersing pupils in the Welsh language and as a result the Local Authority is looking to change the nature of provision.

As a result of the ongoing challenges that both schools face, it is not possible to sustain current arrangements and a review of the education provision within the areas of Blaenau and Llandybie is required.

## The Proposal

- Discontinue Ysgol Gynradd Blaenau as of 31 August 2021.
- From 1 September 2021 all pupils will be registered at Ysgol Llandybie operating on both sites (Ysgol Gynradd Llandybie and the former Ysgol Gynradd Blaenau) increasing its capacity to 287 + 50 nursery places.
- Re-designate Ysgol Gynradd Llandybie's catchment area to include that of the former Ysgol Gynradd Blaenau catchment area as of 1 September 2021.
- Change the nature of provision at Ysgol Gynradd Llandybie to Welsh Medium as of 1 September 2021.
- Relocate Ysgol Gynradd Llandybie to a new school site and increase its capacity to 315 + 45 nursery places as of September 2024, when occupation of the new school is proposed.

The transitional capacity noted above (287 + 50 nursery places) combines both schools' current capacity including nursery places. As a result, the nursery places in the transitional capacity is greater than the final school's capacity. The final capacity figure (315 + 45 nursery places) meets the need and demand of the area for the longer term.

It is the Local Authority's intention that all current pupils remain at the school and continue to receive their education through the current language. It is important to note that there will be no change for current pupils attending Ysgol Llandybie

## Recommendation

It is recommended that the Executive Board approves to proceed with the proposal as outlined above and a formal consultation be initiated.

**DETAILED REPORT ATTACHED?**

**YES: Draft Consultation Document**

# IMPLICATIONS

I confirm that other than those implications which have been agreed with the appropriate Directors / Heads of Service and are referred to in detail below, there are no other implications associated with this report:

Signed:  Head of Access to Education

Policy, Crime & Disorder and Equalities	Legal	Finance	ICT	Risk Management Issues	Staffing Implications	Physical Assets
<b>YES</b>	<b>YES</b>	<b>YES</b>	<b>YES</b>	<b>YES</b>	<b>YES</b>	<b>YES</b>

### 1. Policy, Crime & Disorder and Equalities

Developments are consistent with the Authority's Corporate Strategy and the Modernising Education Strategic Outline Programme.

### 2. Legal

Appropriate consultation will need to be initiated in accordance with the relevant statutory procedures.

### 3. Finance

Revenue implications will be catered for within the Local Management of Schools Fair Funding Scheme.

### 4. ICT

ICT colleagues will be consulted with in relation to the potential relocation of IT equipment.

### 5. Risk Management Issues

Continuing with current provision would see current problems being perpetuated with the education of children in the area being placed at unacceptable risk and the County Council failing to meet WG target that all buildings should be of an appropriate standard.

### 6. Staffing Implications

Staffing implications will be addressed in accordance with the County Council's Policy and Procedures.

## 7. Physical Assets

- i. One redundant school site – Ysgol Gynradd Blaenau. Should the proposal be adopted the property will be transferred to Corporate Property Division of the Regeneration and Policy Department for the procedures outlined in the 'Future Use/Disposal of Redundant Land and Buildings arising from the Modernising Education Programme policy to be actioned.

This policy has been developed to allow the community to be offered the asset in the first instance before placing the site on the open market.

- ii. If the proposal is implemented to discontinue Ysgol Gynradd Blaenau, Ysgol Gynradd Llandybie will proceed to operate on split sites occupying both current Ysgol Gynradd Llandybie and Ysgol Gynradd Blaenau locations until the proposed new Ysgol Gynradd Llandybie school building is ready for occupation.
- iii. Following the project completion of developing a new school building for Ysgol Gynradd Llandybie the current Ysgol Gynradd Llandybie will become redundant as point i above.



## CONSULTATIONS

<p><b>I confirm that the appropriate consultations have taken in place and the outcomes are as detailed below</b></p>	
<p><b>Signed:</b></p>	<p style="text-align: center;"><i>S. James</i> <b>Head of Access to Education</b></p>
<p><b>1. Scrutiny Committee</b> – Consulted on 23/11/2020. The Education and Children Scrutiny Committee resolved:</p> <ul style="list-style-type: none"> <li>• That the proposal to review Primary Education provision in the Blaenau and Llandybie areas, as detailed in the report be endorsed;</li> <li>• That it be recommended to the Executive Board that a formal consultation process be initiated</li> </ul>	
<p><b>2. Local Member(s)</b> – The local members will be notified of the proposal and will be consulted during the formal consultation period.</p>	
<p><b>3. Community / Town Council</b> – Will be consulted during the formal consultation period.</p>	
<p><b>4. Relevant Partners</b> – Will be consulted during the formal consultation period.</p>	
<p><b>5. Staff Side Representatives and other Organisations</b> – Will be consulted during the formal consultation period.</p>	
<p><b>EXECUTIVE BOARD PORTFOLIO HOLDER AWARE/CONSULTED</b></p>	<p><b>YES</b></p>

<p><b>Section 100D Local Government Act, 1972 – Access to Information</b> <b>List of Background Papers used in the preparation of this report:</b></p>	
<p><b>Title of Document</b></p>	<p><b>Locations that the papers are available for public inspection</b></p>
<p>Stage 1 (Permission to Consult) – ECS Scrutiny Committee Report</p>	<p><a href="#">Summary.pdf (gov.wales)</a></p>
<p>Carmarthenshire’s Welsh in Education Strategic Plan</p>	<p><a href="https://www.carmarthenshire.gov.wales/home/council-democracy/strategies-and-plans/welsh-in-education-strategic-plan/">https://www.carmarthenshire.gov.wales/home/council-democracy/strategies-and-plans/welsh-in-education-strategic-plan/</a></p>
<p>MEP Biennial Review</p>	<p><a href="http://www.carmarthenshire.gov.uk">www.carmarthenshire.gov.uk</a> Executive Board 20<sup>th</sup> June 2016</p>
<p>21<sup>st</sup> Century Schools Website</p>	<p><a href="http://www.21stcenturyschools.org">www.21stcenturyschools.org</a></p>
<p>School Organisation Code 2018</p>	<p><a href="https://gov.wales/sites/default/files/publications/2018-10/school-organisation-code-second-edition.pdf">https://gov.wales/sites/default/files/publications/2018-10/school-organisation-code-second-edition.pdf</a></p>

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# Proposal to review Primary Education Provision in the Blaenau and Llandybie areas

## Consultation Document

**DRAFT**

[carmarthenshire.gov.uk](http://carmarthenshire.gov.uk)

Cyngor **Sir Gâr**  
**Carmarthenshire**  
County Council



## **School Modernisation Section**

**Sara Griffiths**, Modernisation Team Manager

If you require this information in large print, Braille or on audiotape please contact the Department for Education & Children

**Email:** [DECMEP@carmarthenshire.gov.uk](mailto:DECMEP@carmarthenshire.gov.uk)

**Telephone:** 01267 246618

## Foreword

As part of its statutory obligation to keep the number and type of school places under review, the County Council has adopted a wide-ranging programme designed to improve school buildings and enhance opportunities for learning. The strategy reflects the vision and policies established by the County Council which embrace the requirement to deliver services, to clear standards – covering both cost and quality – by the most economic and effective means. In our drive to continually improve on the services made available to all learners, we must maximise the finite resources available to the Council, and continue to work in partnership with all those who have a contribution to make to the process of learning and the wellbeing of both children and their families. Schools of the future will need to serve as a focus for a wide range of services dedicated to serving the needs of the community through a joined up approach.

Carmarthenshire is blessed with many very able education leaders and teachers but the continuing changes to the curriculum places a heavy demand on their skills to meet the wide ranging demands of all children. Although the processes of learning, and skills of teaching, are extremely important, deep subject knowledge on the part of the teacher is essential if learners with their various gifts in different areas are to discover and develop their talents to the full.

Schools designed to meet current demands are expected to provide a broad and balanced curriculum through high quality and inspirational teaching. In the planning of new provision it will be important to ensure that our schools are properly equipped to enhance opportunities for social inclusion, sustainable development, equal opportunities and bilingualism. In practical terms we need to ensure that provision reflects the changing patterns of population, with schools based in the right location with accommodation and facilities fit to serve the needs of all learners in the twenty first century.

Consultation will follow the guidelines established by the Welsh Government and will involve identified interested parties. The information set out in this document is intended to clarify the proposals for your school and support the consultation process.



**Gareth Morgans**  
Director of Education and Children

## Glossary of Abbreviations

<b>ALN</b>	Additional Learning Needs
<b>AN</b>	Admission number
<b>CCC</b>	Carmarthenshire County Council
<b>CP</b>	Community Primary
<b>DS</b>	Dual Stream
<b>EM</b>	English medium
<b>Estyn</b>	Her Majesty's Inspectorate for Education and Training in Wales
<b>FTE</b>	Full Time Equivalent
<b>LA</b>	Local Authority
<b>MCSW</b>	Measuring the Capacity of Schools in Wales
<b>MEP</b>	Modernising Education Programme
<b>NOR</b>	Number on Roll
<b>PLASC</b>	Pupil Level Annual School Census Data
<b>WESP</b>	Welsh in Education Strategic Plan
<b>WG</b>	Welsh Government
<b>WM</b>	Welsh medium

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## Introduction

Carmarthenshire County Council has a legal responsibility to review the number and type of schools it maintains in the area and whether or not it is making the best use of the resources and facilities to deliver the opportunities that children deserve.

As part of this process the Council has published its vision on how it sees the future for all of the primary and secondary schools in the County and this includes consulting on the future shape of education in Blaenau and Llandybie.

This consultation document outlines current provision and options to determine the optimum solution for meeting future need.

## Schools subject to proposals

		Ysgol Gynradd Blaenau	Ysgol Gynradd Llandybie
<b>School Location</b>		SA18 3BQ	SA18 3JB
<b>Age Range</b>		4-11	3-11
<b>School Category</b> (Community [C], Voluntary Aided [VA], Voluntary Controlled [VC])		Community	Community
<b>Language Category</b>		Welsh Medium	Transitional
<b>Number of registered Pupils (January 2020)</b>	<b>Nursery Age</b>	5	28
	<b>Reception – Y.6</b>	29	201
	<b>Total</b>	34	229
<b>Number of pupils previously on the register</b>	<b>January 2019</b>	36	238
	<b>January 2018</b>	38	235
	<b>January 2017</b>	50	230
	<b>January 2016</b>	55	223
<b>Pupil Projections</b>	<b>January 2021</b>	31	237
	<b>January 2022</b>	33	236
	<b>January 2023</b>	32	236
	<b>January 2024</b>	34	219
	<b>January 2025</b>	35	228
<b>Capacity (including nursery age)</b>		99	238
<b>Cost per pupil (2020/21)</b>		£4,379	£3,732
<b>School Budget (2020/21)</b>		£149k	£823k
<b>Estyn Inspection Result</b>		<a href="#">Estyn</a>	<a href="#">Estyn</a>
<b>Building Condition Category</b>		C	C



## Background

### Ysgol Gynradd Blaenau

Ysgol Gynradd Blaenau is a Welsh medium, community primary school located in the village of Blaenau. The school provides education to pupils between the ages of 4-11 years old.

In recent years, pupil numbers have declined which has resulted in pupils being taught in mixed age classes with up to four year groups. January 2020 PLASC showed that there were 34 pupils at the school and 65 surplus places.

Whilst there are 44 pupils living within Ysgol Gynradd Blaenau's catchment area **only 8 of those pupils attend the school**, meaning that 36 pupils living within the school's catchment area attend other schools.

Based on current pupil projections it is estimated that the pupil figures will remain low in the foreseeable future.

Ysgol Gynradd Blaenau's building condition is poor. To modernise the building and provide the facilities which the Council would wish to provide, would be considerable and could not be justified having regard to the low and declining pupil numbers.

The school's most recent Estyn inspection completed in January 2016 judged the school's current performance and prospects for improvement to be 'adequate'.

Additionally, having such low pupil numbers at a school impacts on school budget allocation. The school has been in deficit since 2011/12 and remains with a deficit of £83,895 for 2019/20. Their original funding allocation for 2020/21 was £149k and their forecast position for the year is an increase to the deficit balance.

### Ysgol Gynradd Llandybie

Ysgol Gynradd Llandybie is a transitional (working towards Welsh medium) 3-11 primary school located in the rural village of Llandybie approximately two miles north of the town of Ammanford in Carmarthenshire.

Ysgol Gynradd Llandybie is a successful school which had reached its capacity by 2019 and although there was a slight decrease in pupils at January 2020 this trend is likely to continue for the foreseeable future. As a result the Local Authority are developing a scheme to increase the capacity of Ysgol Gynradd Llandybie to 315 places with 45 nursery places by providing a new school with facilities fit for the 21<sup>st</sup> Century with enhanced outside areas on a new site within the current catchment area to replace the current condition C building.

This proposed investment will address poor building condition and lack of adequate space and provision in the existing school by providing a category **A** school with sufficient places for current and projected demand.

A more recent Estyn inspection completed in September 2013 noted that the school currently utilised facilities at the local village playing fields for their sporting activities. The new school building will have its own MUGA (Multi Use Games Area) as well as a sport pitch built into the new school design.

Over the last 5 years there has been a sustained increase in the number of pupils choosing to enter the Welsh medium stream and a fall in the number of pupils choosing to enter the English stream.

The Local Authority has a responsibility to provide all pupils with the best education possible and believes that providing bilingual opportunities has a role to play in this. This aligns with Carmarthenshire's Welsh in Education Strategic Plan 2017-2020's objective of **ensuring "that all pupils are able to speak, read and write the Welsh language fluently by the end of Key Stage 2 in accordance with their expected stage of development."** The best way to create confident, bilingual individuals is through immersing pupils in the Welsh language and as a result the Local Authority is looking to change the nature of provision.

## Rationale for Change

### Ysgol Gynradd Blaenau

Ysgol Gynradd Blaenau has experienced a significant decline in pupil numbers over the last five years. Pupil numbers declined from 55 in January 2016 to 34 in January 2020.

As a result of declining pupil numbers, surplus capacity at the school has increased. Current surplus at the school (January 2020) is 66% or 65 places.

As stated in the School Organisation Code (2018) document published by Welsh Government;

*Where there are more than 10% surplus places in an area overall, local authorities **should** review their provision and **should** consider whether to make proposals for their removal if this will improve the effectiveness and efficiency of provision. A significant level of surplus provision is defined as 25% or more of a school's capacity (as defined in circular 21/2011) and at least 30 unfilled places.*

If this proposal is implemented, it will have a significant positive impact on surplus places in the area.

Ysgol Gynradd Blaenau is funded in accordance with the County Council's funding formula. Under the School Funding (Wales) Regulations 2010, the Individual Schools Budget must be allocated amongst schools maintained by the authority in the form of

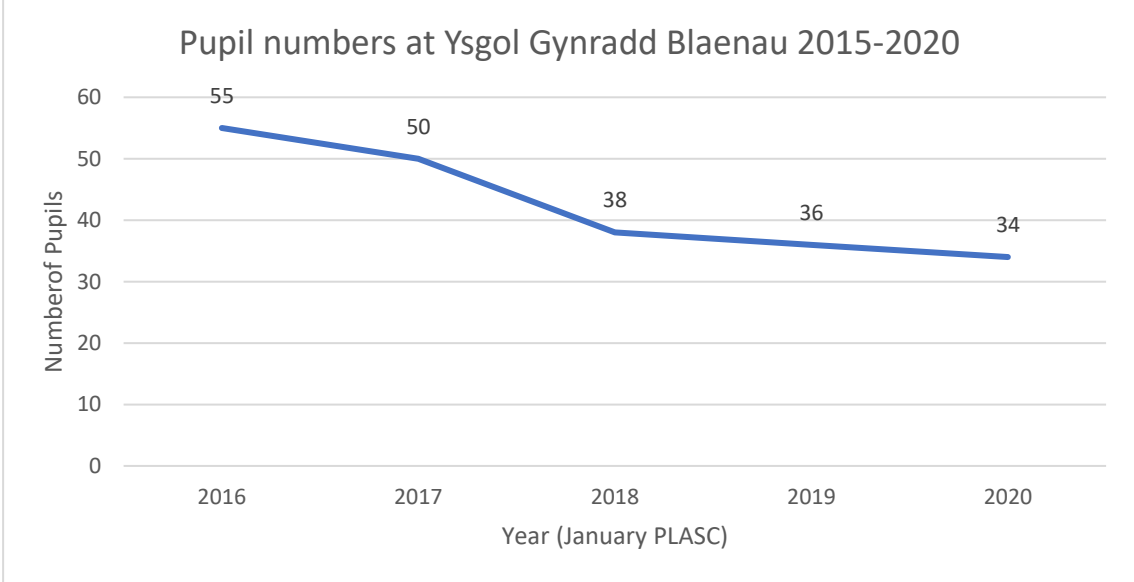
budget shares, using a locally determined funding formula. The regulations require that at least 70% of the funding is to be distributed on the basis of pupil numbers. The current funding formula provides support for smaller school via a lump sum supplement and a federation supplement for schools that are in a formal or informal federation. The school also receives additional grant support due to the low pupil numbers.

The school has been in deficit since 2011/12 and remains with a deficit of £83,895 for 2019/20. Their original funding allocation for 2020/21 was £149k and their forecast position for the year is an increase to the deficit balance.

The deficit budget, reduction in pupil numbers and budget cuts has placed the school in an extremely difficult financial position.

Declining pupil numbers and increasing surplus places has been a challenge for Ysgol Gynradd Blaenau in the last five years.

The graph below highlights the decline in pupil numbers at the school over the last five years.



Having such a small number of pupils makes it extremely difficult for the school to deliver the breadth and depth of curricular and social experiences which pupils require to fully develop.

**Capacity Information**

Historical surplus places for Ysgol Gynradd Blaenau are shown in the following table:

	Jan 16	Jan 17	Jan 18	Jan 19	Jan 20
<b>Ysgol Gynradd Blaenau</b>	99	99	99	99	99
<b>Total Capacity</b>					
<b>Pupil Numbers</b>	55	50	38	36	34
<b>Surplus</b>	44	49	61	63	65
<b>% Surplus</b>	44%	49%	62%	64%	66%

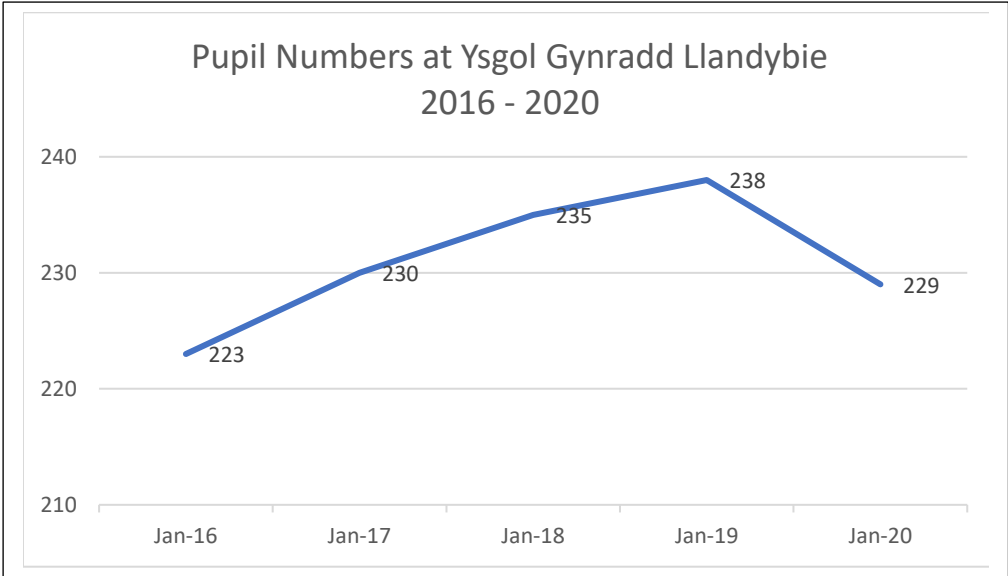
As can be seen from the table, Ysgol Gynradd Blaenau has experienced a significant % surplus in the last five years. Ysgol Gynradd Blaenau's % surplus in the last five years has exceeded 25% surplus places which the Welsh Government considers to be 'significant'. Welsh Government advises local authorities to review their provision where there are more than 10% surplus places in an area overall.

### Ysgol Gynradd Llandybie

This proposal has been prepared in response to the increase in pupils attending Ysgol Gynradd Llandybie, Carmarthenshire County Council's Welsh in Education Strategic Plan (WESP) and the Welsh Medium Education Strategy (WMES). The Local Authority has a vision for a bilingual Carmarthenshire and a commitment in providing category A schools with sufficient places for current and projected demand with facilities fit for the 21<sup>st</sup> Century.

Ysgol Gynradd Llandybie had reached its capacity by 2019 and although there was a slight decrease in pupils at January 2020 this trend is likely to continue for the foreseeable future, as a result the Local Authority are developing a scheme to increase the capacity of Ysgol Gynradd Llandybie to 315 places with 45 nursery places by providing a new school with facilities fit for the 21<sup>st</sup> Century on a new site as the current school building to replace the current condition C building. The proposed investment will address poor building condition and lack of adequate space in the current school by providing a new school on a new site with 21<sup>st</sup> Century facilities.

### Pupil Numbers (January PLASC figures)



As can be seen from the graph above, there has been a steady increase in pupils attending Ysgol Gynradd Llandybie over the last five years. By January 2019 the school had reached its capacity of 238 pupils and although pupil numbers have declined slightly by January 2020 to 229 pupils the school only has 4% surplus places.

## Capacity Information

Historical surplus places for Ysgol Gynradd Llandybie are shown in the following table:

	Jan 16	Jan 17	Jan 18	Jan 19	Jan 20
<b>Ysgol Gynradd Llandybie</b>	302	246	238	238	238
Total Capacity					
Pupil Numbers	223	230	235	238	229
Surplus	79	16	3	0	9
% Surplus	26%	7%	1%	0%	4%

As can be seen from the table above, there is only 4% surplus capacity at Ysgol Gynradd Llandybie by January 2020.

## Whole School English / Welsh Split – Ysgol Gynradd Llandybie

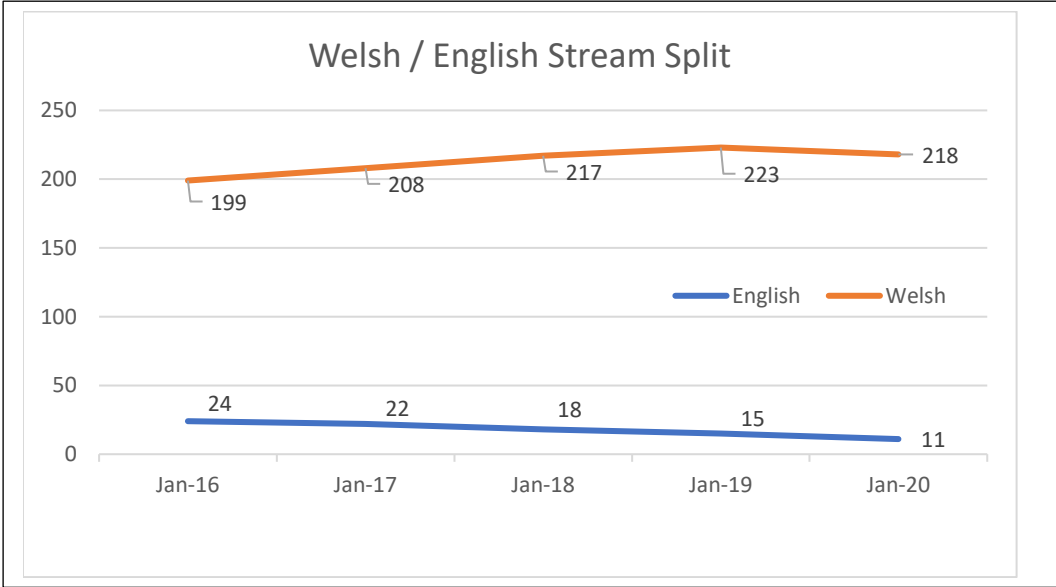
		Foundation Phase Part Time	Foundation Phase Full Time	Key Stage 2	Total
<b>2020</b>	English medium	0	0	11	11
	Welsh Medium	17	85	116	218
	<b>Total</b>	<b>17</b>	<b>85</b>	<b>127</b>	<b>229</b>
<b>2019</b>	English Medium	0	0	15	15
	Welsh Medium	17	107	99	223
	<b>Total</b>	<b>17</b>	<b>107</b>	<b>114</b>	<b>238</b>
<b>2018</b>	English Medium	0	0	18	18
	Welsh Medium	11	120	86	217
	<b>Total</b>	<b>11</b>	<b>120</b>	<b>104</b>	<b>235</b>
<b>2017</b>	English Medium	0	0	22	22
	Welsh Medium	0	132	76	208
	<b>Total</b>	<b>0</b>	<b>132</b>	<b>98</b>	<b>230</b>
<b>2016</b>	English Medium	0	4	20	24
	Welsh Medium	0	126	73	199
	<b>Total</b>	<b>0</b>	<b>130</b>	<b>93</b>	<b>223</b>

(January PLASC Data)

As can be seen from the table above, the number of pupils attending the English stream has declined from 24 in 2016 to 11 in 2020.

Over the last 5 years there has been a sustained increase in the number of pupils choosing to enter the Welsh medium stream and a fall in the number of pupils choosing to enter the English stream.

The following chart shows the number of pupils within the language streams at Ysgol Gynradd Llandybie between January 2016 and 2020 (PLASC).



As can be seen from the chart there was only 11 pupils attending the English stream in January 2020.

## The Proposal

- Discontinue Ysgol Gynradd Blaenau as of 31 August 2021.
- From 1 September 2021 all pupils will be registered at Ysgol Llandybie operating on both sites (Ysgol Gynradd Llandybie and the former Ysgol Gynradd Blaenau) increasing its capacity to 287 + 50 nursery places.
- Re-designate Ysgol Gynradd Llandybie's catchment area to include that of the former Ysgol Gynradd Blaenau catchment area as of 1 September 2021.
- Change the nature of provision at Ysgol Gynradd Llandybie to Welsh Medium as of 1 September 2021.
- Relocate Ysgol Gynradd Llandybie to a new school site and increase its capacity to 315 + 45 nursery places as of September 2024, when occupation of the new school is proposed.

The transitional capacity noted above (287 + 50 nursery places) combines both schools' current capacity including nursery places. As a result, the nursery places in the transitional capacity is greater than the final school's capacity. The final capacity figure (315 + 45 nursery places) meets the need and demand of the area for the longer term.

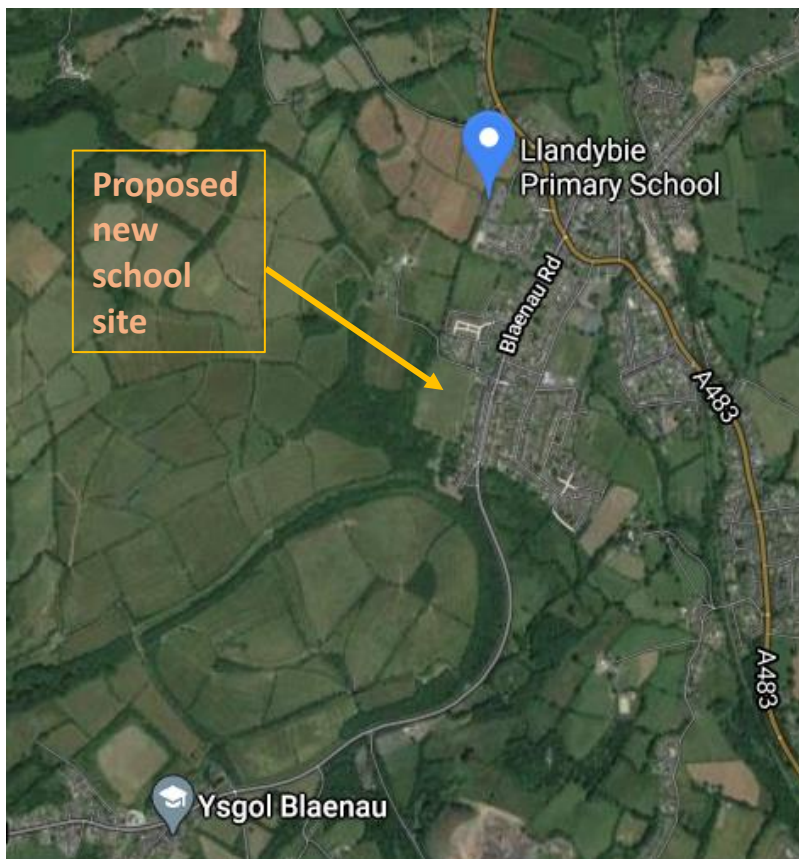
### Location of new school building

As part of the 21<sup>st</sup> Century Schools Modernising Education Programme a proposed preferred site for the location of the new school building has been identified. The location of the proposed preferred site is within a mile of the current Ysgol Gynradd Llandybie but is over a mile in distance from Ysgol Gynradd Blaenau. Whilst the proposals noted within this document are subject to County Council approval and the future capital investment subject to business case approval by Welsh Government, consultation on relocating Ysgol Gynradd Llandybie is required in order to satisfy the School Organisation Code (2018).

The aerial map shown on page 14 illustrates the proposed\* preferred location of the new school building.

\*subject to gaining all relevant approvals

## Proposed preferred location of the new school building



## Advantages and Disadvantages of the proposal

### Advantages

- Sufficient Welsh medium places to meet current and projected demand.
- Improved 21<sup>st</sup> century facilities to allow for a full delivery of the modern curriculum.
- Increased access to learning, sporting and cultural opportunities.
- Deliver primary education in buildings that meet the aspirations of the Local Authority's 21<sup>st</sup> Century Schools strategic outline programme.
- To ensure more efficient use of financial resources.
- Improved energy efficiencies of the estate.
- Reduces surplus places in an area to ensure the Local Authority makes best use of its resources and facilities.
- More fulfilling teaching environment improves morale.
- More effective staffing structures management and support.
- More opportunity for teachers professional and personal development.
- Learners will have an environment that will motivate their learning.
- Enhance community use of school facilities
- Enhanced external areas with purposeful outdoor play areas
- Fit for purpose nursery facilities in accordance with the Foundation Phase requirements,



## Disadvantages

- Requires a statutory process to instigate change.
- Dependent on business case approval to secure funding for investment.
- Increased travelling time for some pupils.
- Community of Blaenau lose presence of school within their immediate community/area.

## Risks and Counter Measures

Risk		Counter Measure
1.	Failure to obtain statutory approval to implement process.	- Follow guidelines as set out in the School Organisation Code 2018
2.	Failure to gain approval of business cases	- Follow guidelines as set out in the 21 <sup>st</sup> Century Schools and Education Funding Programme business case guidance 2018
3.	An unsatisfactory consultation with the community	- Develop communication strategy and consult on a regular basis to address concerns

## School Catchment Area

The current catchment area of Ysgol Gynradd Llandybie will be extended to accommodate the current catchment area of Ysgol Gynradd Blaenau (should the proposal to discontinue Ysgol Gynradd Blaenau be implemented).

## Secondary School Transfers

There will be no change to the current transfer arrangements for pupils in respect of Secondary education.

## Staffing

Staffing implications will be addressed in accordance with the County Council's Redeployment Policy and Procedures.

The Local Authority has staffing policies and procedures in respect of school reorganisation and these will be implemented if required. The Authority will support school staff in securing suitable alternative employment if at all possible, through redeployment processes should this be necessary.

Additionally, it will provide linguistic support for teaching and support staff at an appropriate level and according to individual need to ensure that all staff have the skills needed to deliver the curriculum in Welsh.

## **WESP**

This proposal seeks to increase Welsh language provision in the Llandybie area by formalising the schools' progress along the Welsh language continuum. If the proposal is implemented the school will move from being transitional to Welsh medium. This supports the targets as outlined in the LA's approved Carmarthenshire's Welsh in Education Strategic Plan 2017-2020 and support's Welsh Government's 'Cymraeg 2050: A Million Welsh Speakers' aim. It also supports the new county Welsh Language Targets set by WG for the 10 year Welsh in Education Strategic Plans as well as aligning with the future new School Designations.

## **Financial Implications - Revenue**

Both Ysgol Gynradd Blaenau and Ysgol Gynradd Llandybie are funded in accordance with the County Council's Fair Funding policy and will receive resources on the same basis as any other school within the County Council, based on pupil numbers and facilities.

## **Capital Receipts**

Any capital receipts received as a result of this proposal will be re-invested into the Modernising Education Programme.

## **Land and Buildings**

One redundant school site – Ysgol Gynradd Blaenau. Should the proposal be adopted the property will be transferred to Corporate Property Division of the Regeneration and Policy Department for the procedures outlined in the 'Future Use/Disposal of Redundant Land and Buildings arising from the Modernising Education Programme policy to be actioned. This policy has been developed to allow the community to be offered the asset in the first instance before placing the site on the open market.

## **Transitional Arrangements**

During the transitional period pupils will remain on their existing school sites under the management of Ysgol Llandybie until the new build is ready for occupation to accommodate all pupils from Ysgol Blaenau and Ysgol Llandybie.

It is the Local Authority's intention that all current pupils remain at the school and continue to receive their education through the current language. It is important to note that there will be no change for current pupils attending Ysgol Llandybie.

## **Admissions Arrangements**

The County Council is the Admissions Authority for Ysgol Blaenau and Ysgol Gynradd Llandybie.

The School Admissions Unit,  
Carmarthenshire Local Authority,  
Department for Education and Children,  
Block 2,  
Main Building,  
St. David's Park,  
Carmarthen. SA31 3HB  
Tel No: 01267 246449

E-mail: [admissions@carmarthenshire.gov.uk](mailto:admissions@carmarthenshire.gov.uk)

## **Transport Impact Assessment**

Transport will be provided in accordance with the Council's School Transport Policy. If the proposal is implemented. The distance from Ysgol Blaenau to the new Llandybie school is approximately 1.3 miles.

Llandybie's new school building will be designed to incorporate safe areas for the drop-off and collection of pupils. If the proposal is approved, safe routes to school will be looked at as part of the Transport Impact Assessment for the new school building.

## **Community Impact Assessment**

Please refer to Appendix A of this consultation document for full details of the Community Impact Assessment undertaken.

## **Welsh Language Impact Assessment**

Please refer to Appendix B of this consultation document for full detail of the Welsh Language Impact Assessment undertaken.

## Equality Impact Assessment

Please refer to Appendix C of this consultation document for full details of the Equality Impact Assessment undertaken.

### Alternative Options Considered

In developing a preferred option the Authority considered a range of alternative options.

<b>Status Quo no change to Ysgol Gynradd Blaenau</b>	
<b>Advantages</b>	<b>Disadvantages</b>
No change to stakeholders	Pupils continue to be taught in a condition C building
No statutory process required	Not financially viable for the long term
Blaenau Community retain the presence of a school	Pupils continue to be taught in multi-age classes
	Pupils taught in classes which span the key stages
	Lack of sustainable leadership
	Declining pupil numbers and high surplus places
	Inadequate facilities with little or no outdoor teaching facilities
	Inadequate modern facilities to support the new curriculum and digital learning

<b>Status Quo no change to Ysgol Gynradd Llandybie</b>	
<b>Advantages</b>	<b>Disadvantages</b>
No change to stakeholders	Pupils continue to be taught in a condition C school building
No statutory process required	Inadequate outdoor areas
No Business Case approval required	School has reached its capacity
	Inadequate modern facilities to support the new curriculum and digital learning
	Inadequate facilities to share with the local community
	Limited space/opportunities to develop existing site without land acquisition

<b>Federation- Formal federation between Ysgol Gynradd Llandybie and Ysgol Gynradd Blaenau</b>	
<b>Advantages</b>	<b>Disadvantages</b>
Opportunity to share management, governing body responsibility and curriculum expertise	Requires a legal process
Deliver greater value for money	Will not address deficit budget at Ysgol Gynradd Blaenau
Allows schools to pool resources and staff	Does not address falling pupil numbers and surplus places at Ysgol Gynradd Blaenau
Extend the breadth and quality of education provision	Pupils continue to be taught in condition C buildings
Respond to pupils' wider needs	Does not provide pupils with modern 21 <sup>st</sup> century facilities
Widen opportunities for staff professional development	Managing headteacher time across two schools
	Requires the rationalisation of both governing bodies
	More work for governors in the first year of Federation

<b>Status Quo remains for Ysgol Gynradd Blaenau/New School building for Ysgol Gynradd Llandybie</b>	
<b>Advantages</b>	<b>Disadvantages</b>
No change Ysgol Gynradd Blaenau stakeholders	Ysgol Gynradd Blaenau pupils continue to be taught in a condition C school building
No increased travelling times for Ysgol Gynradd Blaenau	Does not address falling pupil numbers and surplus places at Ysgol Gynradd Blaenau
Blaenau Community retain the presence of a school	Does not address deficit budget at Ysgol Gynradd Blaenau
Ysgol Gynradd Llandybie pupils are provided with new 21 <sup>st</sup> Century School building and facilities	Business Case approval required to secure funding for new school building for Ysgol Gynradd Llandybie
Addresses the capacity pressure at Ysgol Gynradd Llandybie	Statutory processes required to increase the capacity and change nature of provision at Ysgol Gynradd Llandybie
Ysgol Gynradd Llandybie are provided with modern facilities to support the new curriculum and digital learning	
Enhanced community facilities provided through investment for community of Llandybie	
Ysgol Gynradd Llandybie pupils are provided with high quality learning	

environment to support the wellbeing of pupils and to enhance learner progress	
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<b>Preferred Option</b>	
<b>Discontinue Ysgol Gynradd Blaenau and include its catchment area within the current catchment area of Ysgol Gynradd Llandybie</b>	
<b>Advantages</b>	<b>Disadvantages</b>
Ysgol Gynradd Blaenau Pupils will remain in their current school building until occupation of the new school*	Blaenau community lose the presence of a school in their community when pupils occupy the new school building*
Addresses the surplus spaces at Ysgol Gynradd Blaenau and capacity pressures at Ysgol Gynradd Llandybie	Statutory Process required
Ensures all pupils are educated in condition A schools	Business Case approval required
All pupils are provided with modern facilities to support the new curriculum and digital learning	Change for stakeholders
Addresses the deficit budget at Ysgol Gynradd Blaenau	
Delivers greater value for money	
Provides enhanced community facilities for use by both Blaenau and Llandybie communities	

\***Business case approval/WG funding**

### School(s) affected by this proposal

School Name	Ysgol Gynradd Blaenau	Ysgol Gynradd Llandybie	Ysgol Gymraeg Rhydaman	Ysgol Bro Banw	Ysgol Ffairfach	Ammanford Nursery	Ysgol Parcyrhun	Ysgol Gynradd Saron	Ysgol Gynradd Penygroes	
School Location	SA18 3BQ	SA18 3JB	SA18 2NS	SA18 2NF (Infant pupils) SA18 2NS (Junior pupils)	SA19 6SY	SA18 2NS	SA18 3HB	SA18 3LH	SA14 7NT	
County	Carmarthenshire									
Age Range	4-11	3-11	4-11	4-11	4-11	3-5	4-11	4-11	4-11	
School Category (Community [C], Voluntary Aided [VA], Voluntary Controlled [VC])	C	C	C	C	C	C	C	C	C	
Language Medium Category (PLASC)	WM	TR	WM	DS	WM	DS	DS	WM	WM	
Number of registered Pupils (January 2020 )	Nursery	5	28	18	13	3	12	16	17	6
	Reception – Y.6	28	201	270	402	95	93	195	240	165
	<b>Total</b>	<b>34</b>	<b>229</b>	<b>288</b>	<b>415 (ex SEN Unit)</b>	<b>98</b>	<b>105</b>	<b>211</b>	<b>257</b>	<b>171</b>
Number of pupils previously on the register	January 2019	36	238	296	409 (ex SEN Unit)	106	99	223	252	183
	January 2018	38	235	294	406 (ex SEN Unit)	98	95	216	175	182

School Name		Ysgol Gynradd Blaenau	Ysgol Gynradd Llandybie	Ysgol Gymraeg Rhydaman	Ysgol Bro Banw	Ysgol Ffairfach	Ammanford Nursery	Ysgol Parcyrhun	Ysgol Gynradd Saron	Ysgol Gynradd Penygroes
	January 2017	50	230	277	399(ex SEN Unit)	102	78	214	229	181
	January 2016	55	223	276	413 (ex SEN Unit)	99	80	196	237	184
Pupil Projections	January 2021	31	237	304	415	98	-	214	249	175
	January 2022	33	236	306	409	99	-	214	251	172
	January 2023	32	236	303	412	96	-	217	254	165
	January 2024	34	219	313	402	96	-	212	256	168
	January 2025	35	228	324	401	95	-	206	246	170
Capacity (including nursery)		99	238	232	523	102	95	221	240	186
Cost per pupil (2020/21)		£4,379	£3,732	£3,294	£5,650	£4,139	-	£4,636	£3,448	£3,468
School Budget (2020/21)		£149k	£823k	£949k	£2,740k	£406k	-	£978k	£886k	£593k
Estyn Inspection Result		<a href="#">Estyn</a>	<a href="#">Estyn</a>	<a href="#">Estyn</a>	<a href="#">Estyn</a>	<a href="#">Estyn</a>	<a href="#">Estyn</a>	<a href="#">Estyn</a>	<a href="#">Estyn</a>	<a href="#">Estyn</a>
Building Condition Category		C	C	A	B	B	B	B	B	B



## Evaluation of Present Arrangements

### Ysgol Gynradd Blaenau

Estyn inspected Ysgol Gynradd Blaenau in January 2016, judging its performance to be 'Adequate' and its capacity to improve also to be 'Adequate.' The school's progress against the recommendations then witnessed its removal from the 'Estyn Monitoring' category in May 2017.

Since this time, pupil numbers have decreased resulting in the pupils being taught within two classrooms: one foundation phase class and one key stage 2 class.

Following the recent promotion of the previous headteacher, the foundation phase teacher has acted up as the headteacher since September 2019. As a result, the current staffing has been reduced significantly to 2 FT teachers and one FT teaching assistant. The acting HT has 0.2 non-contact time for leading and managing the school.

### Standards

Literacy standards vary across the school which reflect the pupils' range of abilities. Towards the top of key stage 2 (KS2), the more able and talented are beginning write comprehensively, in both languages. These pupils are able to punctuate their work well using brackets, quotation and exclamation marks for effect, spell most words correctly and use a range of vocabulary to enrich their descriptive work. An example of quality writing is evident within their narrative work on Llyn y Fan. However, many KS2 pupils depend heavily on adult support especially with their writing tasks and their independent writing skills are poor on the whole. The opportunities to write at length, the quantity of writing and quality of presentation does not always reflect their age and ability. Writing work at foundation phase demonstrates that the majority of pupils spell well in line with their age with the very few showing good phonetic understanding. Upper FP pupils are beginning to use instructive writing well, for example, whilst writing instructions for an experiment – 'Y Crochan Hud' (the magic cauldron). The more able and talented at FP are beginning to vary their sentence openers and good examples are seen within their factual work on the squirrel. Welsh oracy standards have generally improved across the school with end of KS2 teacher assessment demonstrating that all pupils achieved the expected oracy level. However, around half did not achieve the expected level with their Welsh and English reading and Welsh writing. Standardised score results for both English and Welsh reading demonstrate that the daily reading sessions have not impacted on reading standards, especially across KS2.

The majority of pupils demonstrate appropriate understanding of mathematical concepts which are in line with their age and ability. However, the opportunities to use and apply their numeracy skills across the curriculum is insufficient at KS2 and do not correlate with the level of work evident within their mathematical work. The very few more able and talented pupils at upper foundation phase are successfully working on higher outcomes. For example, by partitioning 4 digit numbers, recording money using

the digital point to demonstrate pounds and pence and by measuring to the nearest half centimetre.

Many pupils are developing suitable independent research skills. For example, whilst gathering information on hedgehogs. They can use a range of ICT resources and software to present their findings. For example, book creator, popplet, JiT, J2e and powerpoint. The majority of pupils demonstrate appropriate ICT skills and these are developing well at the foundation phase. However, at KS2, there are missed opportunities to develop pupils' ICT skills. For example, pupils did not use the school's green screen equipment to record their Fireworks rules. Last year, the school had recognised the need to develop the use of spreadsheets and the interacting and collaborating strand of the DCF. However, the impact to date is very limited.

Teacher assessments demonstrate that nearly all foundation phase pupils make at least the expected progress from their starting points at school with their Welsh language and mathematical development. By the end of KS2, nearly all pupils make the expected progress or better with their maths and science development. However, the majority do not make the expected progress with their Welsh and English language.

The FPI has decreased this year from 100% to 66.7%. This demonstrates how the very small cohort of 3 can impact adversely on percentages. The CSI shows a decreasing trend and is the lowest it has been for 5 years. Performance at higher levels have remained similarly to last year's results in English and Science, however, performance at L5+ has decreased in maths and Welsh.

KS2 boys tend to underperform in both language and mathematics in comparison to the girls.

Teacher assessments demonstrate that the majority of eFSM pupils make the expected progress with their reading skills in both languages. However, the standardised scores of the national reading tests do not reflect the same progress.

By the end of KS2 nearly all ALN pupils achieved the expected level or better in maths and science. However, half of the ALN pupils did not achieve the expected level in English and Welsh. Progress of ALN pupils across the school vary according to teacher assessment.

### **Wellbeing Standards:**

Appropriate safeguarding procedures are in place and as a result, nearly all pupils feel safe and valued at school. Pupils are generally happy and feel comfortable to talk to any teacher if needed. Relationships between adults and most pupils are positive, with many pupils interacting appropriately during lessons. The majority of pupils are engaged with their learning and contribute positively during lessons. However, many pupils depend heavily on adult support to complete tasks successfully. Most pupils' behaviour is routinely good across the school.

Most pupils are beginning to develop an understanding of the importance of healthy living and personal, social and wellbeing. However, pupils' physical skills are not being fully developed in line with the curriculum and the lack of facilities such as lack of adequate green area and the small tarmac area are partly responsible for this. Many pupils do not demonstrate good age related independency skills and they are not equipped with purposeful strategies to support their learning.

### **Teaching and learning experiences**

Half of the teaching across the school is currently unsatisfactory and these pupils are exposed to poor teaching for 4 consecutive years across their education journey. Around half of the planning does not always meet the needs of all pupils, including pupils on the additional learning needs register. The school hasn't currently got the capacity to address and provide effective intervention to support the needs of all group of learners.

The school worked collaboratively with other schools last year to improve the outdoor learning provision, however, this has not developed effectively and as expected to date. This is beginning to impact on the foundation phase provision. The cluster's science project has improved science provision and expectations at key stage 2.

### **Care support and guidance**

The ALNCo is fully trained in PCP and is aware of the new arrangements for ALN provision. One page profiles are in place for all pupils and the school has undergone IDP meetings. The school has an appropriate procedure in place to track pupil progress and analyse the wellbeing of a very few of its pupils. Provision for ALN pupils is limited due to current staffing levels. Attendance, behaviour and any other concerns are monitored suitably by the acting headteacher. Attendance has decreased slightly from last year from 95.5% to 94.29%. The attendance of eFSM pupils has also declined to 93.84%. The school collaborates relevantly with outside agencies.

### **Leadership and Management**

The school has no headteacher in place and therefore the foundation phase teacher has acted up as the headteacher for the autumn term only. The acting Headteacher is currently partaking in the new and acting headteachers' training and as a result, her knowledge and understanding of the role is gradually developing. The acting headteacher has identified some areas for development, however, a few other significant areas need addressing.

Leaders across the school currently contribute insufficiently to the self-evaluation processes and the impact on standards and outcomes is limited. As a result, many areas for development during the year have made satisfactory progress and continue to be areas for development.

The school collaborates appropriately with the cluster of schools, however, no other collaborative partnerships with other schools have been established for this year with a focus on sharing good practice and improving standards for all learners.

Improved use is made of relevant assessments and data in order to recognise the progress and the needs of all of learners. However, specific and purposeful planning

to ensure that all pupils' needs are met and that all pupils move along the skills continuum remains an area for further discussion. Leaders have adapted and managed staff restructure well under the circumstances, however, the provision for all groups of learners is ineffective.

The school addresses some national priorities appropriately within the School Development Plan (SDP) and the previous headteacher introduced the new teaching and leadership standards to all teaching staff through performance management targets. However, this has not impacted effectively on provision and standards especially across KS2.

The acting headteacher, supported by the chair of Governors, continue to manage aspects of underperformance to ensure that all teaching and learning experiences are at least satisfactory. However, the pace of progress is restricted. The school is aware that the need to address the level of challenge across the school remains an area for development.

### **Impact of the proposal**

Standards are decreasing rapidly at Blaenau therefore this proposal will have a positive impact on the standard of teaching and learning pupils receive.

Llandybie has a newly appointed head teacher who has ensured that a strong collaborative vision is developing across the school, focusing on raising standards and meeting pupils' specific needs well.

Additionally, teaching is good in many lessons. The process of sharing ideas and good practice has had a positive impact on ensuring a consistent approach to teaching across the school, thus reducing in school variation appropriately.

## Ysgol Gynradd Llandybie

Ysgol Gynradd Llandybie was last inspected by Estyn in September 2013 where all three key questions were reported as Good.

Progress since this time is reported below:

### Standards

During a recent learning walk, most pupils are able to speak confidently and can express opinions clearly. For example, in the foundation phase many pupils are able to explain their work with enthusiasm, as they develop their creative skills when creating a collage about castles. Many are able to recall the story, using Pie Corbett strategies and are confidently developing their independent writing skills, as they write a diary about Beti Bwt's day. A few are able to self-assess effectively as they read over their work to correct any errors.

Many pupils in key stage 2 are successful in planning to write a recount of their experiences following a trip to Parc Dinefwr. Many are able to confidently work on number patterns as they use the learning walls effectively to simplify fractions. However, nearly all pupils are able to explain what they are learning and show great pride in their work.

The school has improved its performance in the foundation phase compared with 2018. All foundation phase indicators have performed better than the Local Authority average apart from in language have made expected or better progress when considering their baseline. All eFSM pupils receive beneficial intervention support through effective use of the PDG grant and results indicate that many eFSM pupils perform as well as non-FSM pupils in the foundation phase, making good progress. In the foundation phase all pupils have made expected progress in all indicators including those with additional learning needs and those receiving free school meals.

Outcomes at key stage 2 have varied over the last 3 years. For example, performance at level 4 in English has improved over the last 3 years and Welsh has improved on last year's results, matching the previous year's data. Whilst L4 maths and science data has dipped this year, they remain above 2017 data. Performance at the higher levels has shown an improving trend over 3 years and is higher than the LA average in most indicators, apart from Welsh. Most pupils make the expected progress in most indicators apart from Welsh, where many make expected or better progress.

In all areas the gap between boys and girls attainment has been narrowed and at key stage 2 the boys outperformed the girls in the core subject indicator and science. In all areas the gap between boys and girls attainment has been narrowed and at key stage 2 the boys outperformed the girls in the core subject indicator and science.

Attendance percentage for 2018-19 was 94.78% which is an increase of 0.77% from last year. The school continues to implement robust processes to track monitor and improve pupils' attendance.

## **Teaching and Learning Experiences**

Most pupils have a positive attitude towards learning and feel safe in the school. Pupils demonstrate good behaviour due to the high expectations set by the school. Nearly all pupils are engaged in lessons, as they experience exciting and interesting thematic work to support and develop their numeracy, literacy and ICT skills. In general, many pupils have more confidence when speaking English. However, many pupils' Welsh speaking skills are developing appropriately.

Nearly all teachers model effective language patterns and ensure pupils are actively involved in their learning, contributing their ideas on what and how they wish to learn. Teaching is good in many lessons and there is a clear focus to share good practice to ensure that all staff, including support staff, have opportunities to observe each other teach. The process of sharing ideas and good practice has had a positive impact on ensuring a consistent approach to teaching across the school, thus reducing within school variation appropriately. The head teacher manages underperformance in a robust and supportive manner.

## **Care, Support and Guidance**

The school has formed strong and positive working relationships with parents, carers and the community as partners in the education process. For example, as they work closely on a regular basis with a care home, strengthening and further developing community links. This has contributed positively to pupils' wellbeing as well as the residents of the home. Also, the school has forged strong links with the local church this year and many pupils have contributed in a variety of different ways to church work, such as creating a flower display for the harvest festival, planting bulbs in the church grounds and a school choir has participated in a harvest service.

The school is making good progress with the ALN transformation Bill, as they focus on becoming a PCP school. As a result, nearly all pupils' emotional needs are addressed well, so that they develop in to becoming resilient confident learners.

## **Leadership and Management**

The newly appointed head teacher has taken up post this autumn following a year as acting head teacher. She has ensured that a strong collaborative vision is developing across the school, focussing on raising standards and meeting pupils' specific needs well. Two senior teachers recently appointed as assistant head teachers are effectively building leadership capacity across the school.

Most staff reflect together on how to make their own learning more powerful. Many staff feel comfortable seeking advice from each other. Trust and mutual respect are core values within the school. The distributed model of leadership has provided good professional development opportunities for all staff across the school, who have a designated responsibility in line with the new areas of learning and experience. The

school is beginning to engage in forms of enquiry to investigate and extend their practice. For example, as they pilot the language to literacy project across the foundation phase and at key stage 2.

Structures for regular dialogue and knowledge exchange are working effectively. For example, afterschool meetings include sharing good practice and groups of staff work as a team moderating pupils' work. All staff regularly discuss and evaluate whether actions have the desired impact and change course if necessary. Whilst the staff have set up robust monitoring processes, further work is ongoing to ensure individual pupil skills' development are being more closely tracked and identified.

A few staff have begun to collaborate, learn and exchange knowledge with peers in other schools through networks and school to school work. For example, the foundation phase coordinator has shared good practice with other schools and there is ongoing informal collaborative networking across schools at key stage 2. The school is making sound progress as they develop as a learning organisation.

The school's self-evaluation processes show an accurate knowledge of the school and there is a clear link between self-evaluation processes and the school development plan. This in turn has led to improved pupil progress in most areas of learning.

Robust performance management systems are in place. Targets are linked to the SDP and the new professional teaching standards. Teaching is good in many lessons and there is a clear focus to share good practice to ensure that all staff, including support staff, have opportunities to observe each other teach. The process of sharing ideas and good practice has had a positive impact on ensuring a consistent approach to teaching across the school, thus reducing within school variation appropriately. The head teacher manages underperformance in a robust and supportive manner.

The head teacher provides the governors with regular updates on progress and a minority of governors skilfully challenge the school effectively. The school uses governor expertise successfully to inform others. This in turn is improving the capacity of all governors to challenge the school consistently.

### **Impact of the proposal**

The pupils and staff would benefit greatly from a Carmarthenshire standard new build school with 21<sup>st</sup> Century facilities as the current school building is condition C rated with inadequate facilities.

A new site with improved resources will enhance pupils' learning experiences as well as improving staff and pupils' wellbeing.

Currently, staff room space is limited, and a new build will ensure effective collaborative work between staff and external partnerships.

The school is currently making good progress and a new build will certainly aid in sustaining and raising standards further.

## The Consultation Process

The consultation on this proposal will follow guidelines established by the Welsh Government as stated in the School Organisation Code (2018).

### Who will be consulted?

This document will be sent to the following interested parties:

Staff (Teaching and Ancillary)	Director of Education – All Neighbouring Authorities
Governors and Parents/Guardians	Diocesan Director of Education Church in Wales and RC
Local County Councillors	Estyn
Community Councillors	Regional Transport Consortium
Members of the Senedd (MSs) / Regional Members / Members of Parliament (MP)	Neighbouring Primary and Secondary schools
Welsh Ministers	All relevant unions
SEN Partners	Welsh Language Commissioner
LA Special Educational Needs Division	Local Police and Crime Commissioner
ERW – Education through Regional Working	Flying Start
	Child Care / Early Years
Communities for Work +	Public Services Board
Communities for Work	Legacy
Fusion	Families First Carmarthenshire

***\*Copies of the consultation document will be sent to the Head teacher and Chair of Governors of the surrounding catchment area of schools subject to proposals.***



## Consultation Period

The consultation period for the proposals starts on 11<sup>th</sup> January 2021 and ends on 21<sup>st</sup> February 2021.

Consultees can submit their views in favour of or against a proposal. Responses received during the consultation period will not be treated as statutory objections. If consultees wish to object, they will need to do so in writing during the statutory objection period outlined on page 30.

### Considering your views

During the consultation period you can ask questions and express your views by writing a letter to the address below or by completing an online survey using the following link:

**INSERT LINK**

Letters should be sent to the following address by no later than noon on 21<sup>st</sup> February 2021:

Mr Gareth Morgans, Director of Education and Children's Services,  
Building 2, St. David's Park, Jobs Well Road, Carmarthen, SA31 3HB  
Or E-mail to: [DECMEP@carmarthenshire.gov.uk](mailto:DECMEP@carmarthenshire.gov.uk)

### Drop in sessions

Due to the ongoing implications of the Coronavirus issue we have been advised to postpone all events where there is interaction between staff, parents and the wider community and as a result there will not be a drop in session to discuss proposals. Should you feel strongly about discussing the proposals please contact Miss Isabelle Mariani or Mrs Sharon James by sending an e-mail to [DECMEP@carmarthenshire.gov.uk](mailto:DECMEP@carmarthenshire.gov.uk) and a virtual meeting can be arranged.

### Consultation with Pupils

There will be an opportunity for the pupils of the schools subject to the proposals to participate in the consultation process during a session which will be conducted at the schools.

The information gathered from the consultation with pupils will form part of the consultation report which will be submitted to the Executive Board for consideration following the consultation period.

## Consultation Report

A Consultation Report will be published on Carmarthenshire County Council's website at least 2 weeks before a decision is made on whether or not to proceed to publish a statutory notice. Hard copies of the report will also be available on request. The report

will summarise the issues raised by consultees and provide Carmarthenshire County Council's response to these issues. The report will also contain Estyn's view of the proposal and details of consultation undertaken with the pupils.

The Executive Board of Carmarthenshire County Council will consider the consultation report and decide whether or not to proceed with the proposal.

If the Executive Board decides to continue with the proposal Carmarthenshire County Council must publish a statutory notice.

### **Statutory Notice**

The statutory notice will be published on Carmarthenshire County Council's website and posted at the schools subject to proposals. Copies of the notice will be made available to the schools to distribute to pupils, parents, guardians, and staff members (the schools may also distribute the notice by email).

#### **Statutory Objection Period**

The statutory notice will set out the details of the proposal and invite anyone who wishes to object to do so in writing within a period of 28 days. If objections are received an objection report will be published on the Carmarthenshire County Council website. Hard copies of the report will also be available on request. The report will summarise the issues raised and provide Carmarthenshire County Council's response to those objections.

### **Determination of Proposal**

Carmarthenshire County Council will determine the proposal. The County Council may decide to approve, reject or approve the proposal with modifications. In doing so, the County Council will take into account any statutory objections that it received.

#### **Decision Notification**

Following determination of proposals all interested parties will be informed and advised of the availability of the decision which will be published electronically on Carmarthenshire County Council's website.

## The Statutory Process Time-Table

The statutory process and timetable will be as follows:

11 <sup>th</sup> January 2021	Issue of this consultation document to identified and other interested parties.
21 <sup>st</sup> February 2021	Closing date for views on the proposal to be received by the Department for Education and Children.
27 <sup>th</sup> April 2021	<p>A Consultation Report will be taken to the Executive Board for a decision on whether or not to proceed to publish a statutory notice. OR alternatively proposal ends.</p> <p>The Consultation Report will be published on Carmarthenshire County Council's website at least 2 weeks prior to the publication of a statutory notice.</p> <p>If the decision is made to proceed then a statutory notice will be published. The notice will outline details of the proposal and be published on the Council's web site and be displayed near the entrance of the school and schools which are subject to the proposals. Copies of the notice will be made available to the school to distribute to parents, guardians and staff members.</p> <p>Following publication there will be a 28 day period during which time formal written objections will be invited.</p> <p>The statutory notice will give details on how you may record your objections to the proposal.</p>
8 <sup>th</sup> June 2021	End of formal 28 day notice period for objections. County Council will determine the proposal. The County Council may decide to approve, reject or approve the proposal with modifications, in doing so the County Council will take into account any statutory objections received.
July 2021	<p>Deadline to notify parents of intention to implement proposal.</p> <p>Following determination of proposals all interested parties will be informed and advised of the availability of the decision which will be published electronically on Carmarthenshire County Council's website.</p>

## **Appendix A – Community Impact Assessment**

Each school has an area that it serves, referred to as the catchment area. Each school is expected to accommodate pupils from within its catchment area and schools must have regard for this ongoing demand.

Most parents send their child to their local school but parents have a right to state a preference for other schools.

### **Ysgol Gynradd Blaenau**

#### **Catchment Area Analysis – January PLASC 2020 Data**

##### **Pupils attending the school from inside / outside the catchment**

Based on January PLASC 2020 data, the geographical data in relation to the pupil distribution for Ysgol Gynradd Blaenau catchment area indicated that of the 34 pupils on roll, 8 lived within the catchment area, whilst the remaining 26 were from outside the catchment area.

##### **Pupils living in the catchment area attending other schools.**

Based on January PLASC 2020 data, 36 pupils lived within the Ysgol Gynradd Blaenau catchment area attended other schools.

Taking into consideration the 8 pupils living within the catchment area attending Ysgol Gynradd Blaenau, and the 36 pupils living within the catchment area but attending other schools, a total of 44 pupils are living within the catchment area of Ysgol Gynradd Blaenau.

#### **Other facilities or services provided by the school e.g. after school clubs/ community Library**

The school currently hold a breakfast club for pupils, between 8:10am and 8:50am. Pupils also benefit from an after-school club, which is held between 3:30pm and 5:30pm on Thursday and Friday.

Mudiad Meithrin currently operates from the school between 9am and 3pm on weekdays. The Meithrin provides Welsh medium provision for pupils from the age of two years.

#### **Community Impact**

If approved, the proposal will enhance the community of Blaenau's access to 21<sup>st</sup> Century teaching and learning and community facilities.

## **Ysgol Gynradd Llandybie**

### **Catchment Area Analysis – January PLASC 2020 Data**

#### **Pupils attending the school from inside / outside the catchment**

Based on January PLASC 2020 data, the geographical data in relation to the pupil distribution for Ysgol Gynradd Llandybie catchment area indicated that of the 229 pupils on roll, 180 lived within the catchment area, whilst the remaining 49 were from outside the catchment area.

#### **Pupils living in the catchment area attending other schools.**

Based on January PLASC 2020 data, 140 pupils lived within the Ysgol Gynradd Llandybie catchment area attended other schools.

#### **Other facilities or services the school provides e.g. after school clubs / community library**

The school currently hold a breakfast club for pupils during the weekdays between 8:10am - 8.40am.

Llandybie pupils also have access to 'Clwb Carco' which offers wrap around care Monday to Friday between 9am and 12pm.

The pupils also benefit from an after-school care club, which are held Monday to Friday between 3:15pm and 5:30pm.

#### **Community Impact**

If approved, the proposal will allow increased opportunities for access to Welsh medium education pupil places within the Llandybie area, in line with national and local policies.

## Appendix B – Welsh Language Impact Assessment

Carmarthenshire County Council's vision is to provide a service, which will ensure access to high quality learning opportunities for all children, young people and adults, this enabling the achievement of their full potential within the context of the unique bilingual nature of the county.

This proposal supports the Council's vision and aims for Welsh medium education as set out in Carmarthenshire's Welsh in Education Strategic Plan (WESP) 2017 – 2020. The proposal will allow greater opportunities for access to Welsh medium education within the Llandybie area and will ensure linguistic continuity from the nursery sector along the key stages to the secondary sector so that every pupil becomes fluent and confident in both Welsh and English languages.

### Ysgol Gynradd Blaenau

#### **Standards\***

In Foundation Phase, pupils are assessed in different areas of learning. Based on 2019 data, 66.67% of pupils achieved at least Outcome 5 in 'Language, Literacy and Communication (in Welsh)', whilst 33.33% of pupils achieved at least Outcome 6. In Key Stage 2, pupils are assessed in each of the core subjects. Based on 2019 data, 57.14% of pupils achieved at least Level 4 in Welsh first language whilst 14.29% achieved at least Level 5.

#### **After school activities which provide additional opportunities to use the Welsh language**

The school have previously provided pupils with the opportunity to participate in Urdd club and 'friends club' which were aimed at supporting the Welsh language.

In addition, Mudiad Meithrin operates from the school, providing Welsh medium provision for pupils from the age of two years.

### Ysgol Gynradd Llandybie

#### **Standards\***

School standards have improved in the foundation phase compared with previous years in Welsh language. Outcomes at KS2 have been varied however progress in Welsh have improved with many making expected or better progress.

#### **After school activities which provide additional opportunities to use the Welsh language**

School pupils are offered the opportunity to attend the Urdd Llangrannog summer camp which offers a range of activities.

Ysgol Gynradd Llandybie operates a 'Siarter iaith' initiative to encourage the use of Welsh language socially in school. The school is working towards a bronze, silver or gold award encouraging participation from every member of the school community – pupils, parents, school governors and the wider community.

\*No National Teacher assessments were conducted in 2020 due to the ongoing impact of the Coronavirus outbreak. For this reason, 2019 data has been illustrated.

## **Appendix C – Equalities Impact Assessment**

### **Carmarthenshire County Council Assessing Impact**

#### **The Equality Act 2010**

The Equality Act 2010 (the Act) brings together and replaces the previous anti-discrimination laws with a single Act. It simplifies and strengthens the law, removes inconsistencies and makes it easier for people to understand and comply with it. The majority of the Act came into force on 1 October 2010.

The Act includes a new public sector equality duty (the 'general duty'), replacing the separate duties on race, disability and gender equality. This came into force on 5 April 2011.

#### **What is the general duty?**

The aim of the general duty is to ensure that public authorities and those carrying out a public function consider how they can positively contribute to a fairer society through advancing equality and good relations in their day-to-day activities. The duty ensures that equality considerations are built into the design of policies and the delivery of services and that they are kept under review. This will achieve better outcomes for all.

The duties are legal obligations. Failure to meet the duties may result in authorities being exposed to legal challenge.

Under equality legislation, public authorities have legal duties to pay 'due regard' to the need to eliminate discrimination and promote equality with regard to race, disability and gender, including gender reassignment, as well as to promote good race relations. The Equality Act 2010 introduces a new public sector duty which extends this coverage to age, sexual orientation, pregnancy and maternity, and religion or belief. The law requires that this duty to pay 'due regard' be demonstrated in the decision making process. It is also important to note that public authorities subject to the equality duties are also likely to be subject to the obligations under the Human Rights Act and it is therefore wise also to consider the potential impact that decisions could have on human rights as part of the same process.



### **Carmarthenshire's approach to Equality Impact**

In order to ensure that the council is considering the potential equality impact of its proposed policies and practices, and in order to evidence that we have done so, every proposal will be required to be supported by the attached Equality Impact Assessment. Where this assessment identifies a significant impact then more detail may be required.

### **Reporting on assessments**

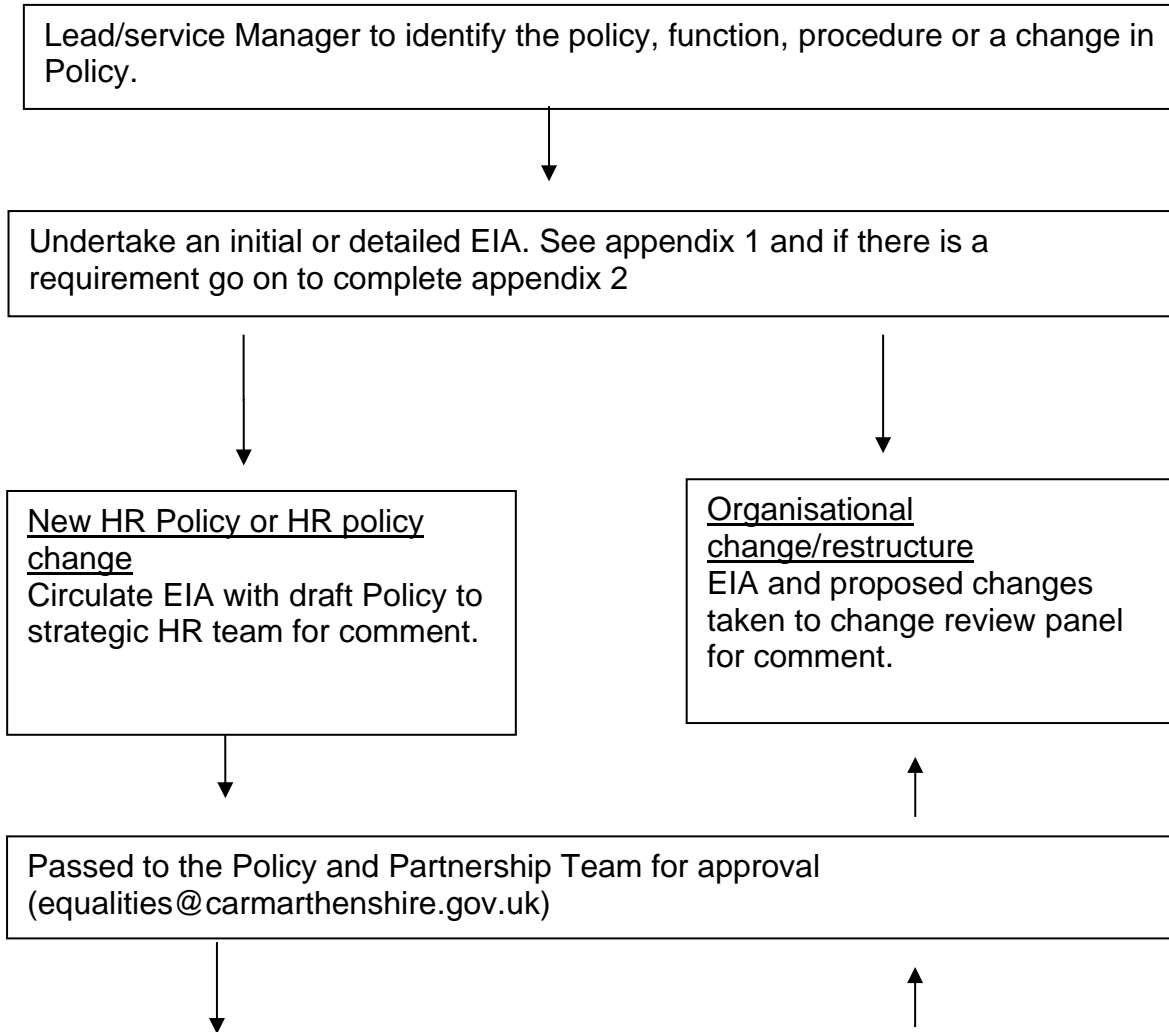
Where it is clear from the assessment that the likely impact on the authority's ability to meet the general duty is substantial, then it must publish a report.

### **Initial and Detailed Equality Impact Assessments**

The initial EIA (appendix 1) is a simple and quick method of assessing the effect of a policy, function, procedure, decision including financial cuts on one or more of the protected characteristics.

The Service Manager responsible for the relevant new or revised policies, functions, procedures and financial decisions must undertake, at least, an initial EIA and where relevant a detailed Equality Impact Assessment (appendix 2); EIA must be attached as background paper with reports to Executive and Scrutiny.

**Equality impact assessment – Process to follow where HR implications have been identified**



Amendments identified /further work to complete or referral to legal

**Initial Equalities Impact Assessment Template**

**Appendix 1**

<b>Department:</b> Education & Children	<b>Completed by (lead):</b> Sara Griffiths	<b>Date of initial assessment:</b> October 2020 <b>Revision Dates:</b> July 2021
<b>Area to be assessed: (i.e. name of policy, function, procedure, practice or a financial decision)</b>	This proposal is to review primary education provision in the Blaenau and Llandybie areas. The scheme is to re-locate Ysgol Gynradd Llandybie to a new site with investment to provide increased capacity in a new school building with 21 <sup>st</sup> Century facilities and excellent outdoor areas. As part of this scheme, the proposal is to increase the capacity of the school to 315 with provision for 45 nursery places.	
<b>Is this existing or new function/policy, procedure, practice or decision?</b>	School Re-organisation Proposal – Modernising Education Programme	
<b>What evidence has been used to inform the assessment and policy? (please list only)</b>		
<ul style="list-style-type: none"> <li>• 21<sup>st</sup> Century Schools Programme</li> <li>• Modernising Education Programme</li> <li>• School Organisation Code 2018</li> <li>• PLASC Data 2020</li> <li>• The Well-being of Future Generations (Wales) Act 2015</li> </ul>		

<b>1. Describe the aims, objectives or purpose of the proposed function/policy, practice, procedure or decision and who is intended to benefit.</b>	The aim of the proposal is to create sustainable primary education for the long term in the Blaenau / Llandybie areas with facilities fit for the 21 <sup>st</sup> Century with sufficient capacity for current and future pupils. This proposal will increase the capacity and number of Welsh medium places available at Ysgol Gynradd Llandybie and follow the objectives and actions as set out in Carmarthenshire’s Welsh in Education Strategic Plan. The
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		scheme will provide the pupils and staff of Ysgol Gynradd Llandybie with a new school building and facilities which are suitable for teaching and learning in the 21 <sup>st</sup> Century.			
<b>The Public Sector Equality Duty requires the Council to have “due regard” to the need to:-</b> <b>(1)</b> eliminate unlawful discrimination, harassment and victimisation; <b>(2)</b> advance equality of opportunity between different groups; and <b>(3)</b> foster good relations between different groups (see guidance notes)		<b>2. What is the level of impact on each group/protected characteristics in terms of the three aims of the duty? Please indicate high (H) medium (M), low (L), no effect (N) for each.</b>	<b>3. Identify the risk or positive effect that could result for each of the group/protected characteristics?</b>		<b>4. If there is a disproportionately negative impact what mitigating factors have you considered?</b>
			Risks	Positive effects	
Protected characteristics Page 214	Age	L		The proposal will provide a new school building to accommodate pupils aged 3-11 within the school building.	
	Disability	L		The new school building will be fully DDA compliant ensuring full accessibility for all.	

<b>Gender reassignment</b>	N	Neutral		
<b>Race</b>	N	Neutral		
<b>Religion/Belief</b>	N	Neutral		
<b>Pregnancy and maternity</b>	N	Neutral		
<b>Sexual Orientation</b>	N	Neutral		
<b>Sex</b>	N	Neutral		
<b>Welsh language</b>	L		The increase in capacity will allow greater opportunities for access to Welsh medium education within the Llandybie area in line with national and local policies.	
<b>Any other area</b>	L		The increase in capacity of the school will not have an effect on schools surrounding the Ysgol Gynradd Llandybie catchment area.	

<p><b>5. Has there been any consultation/engagement with the appropriate protected characteristics?</b></p>	<p>YES <input checked="" type="checkbox"/> NO <input type="checkbox"/></p> <p>The Project Officer has liaised with the Headteacher, Staff and Parents of Ysgol Gynradd Blaenau and Ysgol Gynradd Llandybie with regards to the proposal. All stakeholders will be fully consulted during the formal consultation period.</p>	
<p><b>6. What action(s) will you take to reduce any disproportionately negative impact, if any?</b> Ensure that all key stakeholders are fully informed throughout the statutory process.</p>		
<p><b>7. Procurement</b>  <b>Following collation of evidence for this assessment, are there any procurement implications to the activity, proposal, service. N/A</b>  <b>Please take the findings of this assessment into your procurement plan. Contact the corporate procurement unit for further advice.</b></p>		
<p><b>8. Human resources</b>  <b>Following collation of evidence for this assessment, are there any Human resource implications to the activity, proposal or service?</b> As there will be an increase in capacity, additional staffing may be required. However, this will be addressed as the scheme progresses and Human Resources will be fully consulted.</p>		
<p><b>9. Based on the information in sections 2 and 6, should this function/policy/procedure/practice or a decision proceed to Detailed Impact Assessment?</b> (recommended if one or more H under section 2)</p>	<p>YES <input type="checkbox"/> NO <input checked="" type="checkbox"/></p>	
<p><b>Approved by:</b> Head of Service</p>	<p>Simon Davies</p>	<p><b>Date: October 2020</b></p>

## Appendix D - Bilingualism

### Advantages of Bilingualism

#### What does being bilingual mean?

The ability to live your everyday life using two languages.

Being able to switch from one language to another fluently and confidently at any given time.

#### The advantages of being bilingual

##### Education

- Bilingual children tend to be more successful in education. They tend to perform better in tasks.
- Bilingual people find it easier to learn additional languages.
- Children in Welsh medium education do just as well, if not better, in English as children in English medium education.

Evidence: [Estyn Thematic Report- Welsh in Key Stage 2 and Key Stage 3 in Welsh-medium or bilingual schools](#)

##### Career

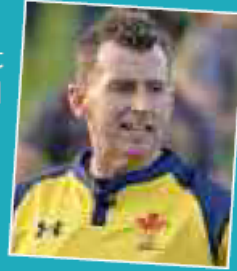
- Speaking two languages is an extra skill to put on your application form and CV.
- Bilingual people earn an average of 11% more income.
- Employers need bilingual workforces in Wales, because services need to be offered bilingually in accordance with the Welsh Standards Paper.

Evidence: [Wales Online Article - Welsh Speakers 'more likely to get top qualifications and jobs'](#)

## Nigel Owens

“ Without my Welsh education in School I would not have had all the opportunities to present and perform and I would not have been encouraged to start as a referee at 16 years old.

I carry Welsh with me wherever I referee in the world. Before each game I listen to Welsh music. I'm lucky enough to have two languages and Welsh is an important part of who I am. ”



## Alex Jones

“ Having a bilingual education has been pivotal to me in so many ways. It meant that I had twice as many opportunities, it doubled my capacity to learn other languages, it enhanced my ability to communicate and therefore make friends, and most importantly, it gave me a strong sense of belonging and of our heritage. Starting out as a broadcaster in Welsh gave me the vast experience I needed to move forward to my dream job. Without a bilingual education, I'd be in a very different place. ”



### Health

- Research shows that being bilingual delays the onset of Dementia and other symptoms of Alzheimer disease.

Evidence: [Article - Delaying the onset of Alzheimer's disease: Bilingualism as a form of cognitive reserve](#)

[The Telegraph Article- Bilingual people twice as likely to recover from a stroke](#)

### Life

- Speaking two languages widens your horizons.
- Being able to speak Welsh gives you access to many aspects of Welsh culture, history and identity.
- Speaking Welsh can provide a key to rich community life.



- Being able to speak Welsh gives you a strong sense of identity and belonging.
- Being able to switch from one language to the other with confidence gives the individual self-confidence and pride.
- Speaking many languages can make people more tolerant towards other cultures.

Evidence: [The Advantages of Bilingualism in Welsh and English by Colin Baker](#)

## Common parental concerns

### **‘How can I help my child with homework if I don’t understand much Welsh myself?’**

Welsh schools set homework instruction in Welsh and in English so there will be no problem in understanding what your child is being asked to do at home. The schools themselves will be happy to provide educational advice and the parents evening will be in your chosen language.

Work set will be appropriate to the pupil’s age and ability level and therefore should be within your child’s reach.

Developing increasingly as independent learners, you may find that your child is happy to progress without extra parental guidance as they get older.

[Booklet - Welsh Homework? No problem](#) (English version)

[Booklet - Gwaith Cartref? Dim problem](#) (Welsh version)

### **‘Will pupils who struggle with Welsh medium education have to move to an English medium school?’**

It is the Local Authority’s desire that all pupil receive the opportunity to become bilingual in both Welsh and English languages. In Welsh medium schools, pupils will receive their education principally through the medium of Welsh, with English being taught as a subject in Key Stage 2 and used as a medium for instruction. Sufficient support will be provided to all pupils as required through a range of mechanisms and tailored to the individual’s needs.

### **‘Will my child’s thinking be affected by being bilingual?’**

’The answer is “yes”, and probably for the better. The presence of two languages in the operating system of the brain is likely to produce a more richly-fed thinking engine (Baker, 2000:66-67).

### **‘Will my child be able to cope with learning through the medium of Welsh?’**

School and staff are fully committed to providing the necessary support to all pupils and parents through a wide range of mechanisms: open door policy; homework

provided bilingually; support by The Athrawon Bro Service; bilingual school website etc. Staff are also required to differentiate the curriculum and make reasonable adjustments when required to meet the needs of every pupil.

### **‘Should the Welsh language be forced?’**

International evidence, cited by the Welsh Government, confirms that the most effective way of developing bilingual children is to immerse them in the less common language whilst also developing their skills in the more common language. This is consistent with national policy to expand Welsh medium education in order to develop increasing numbers of fully bilingual young people and to enable more children to benefit from the advantages of bilingualism, gathered through international research.

### **‘Will learning through the medium of Welsh affect later life opportunities?’**

Yes, but probably for the better. It is the belief of the department, based upon international evidence and local experience, that children benefit from a truly bilingual education, which provides wider skills developments, such as cognitive ability, task understanding and flexibility, enhanced powers of concentration etc. and that all children should receive these opportunities. Being bilingual or multilingual also broadens individuals’ cultural experiences and can enhance career prospects. Bilingualism will increasingly over time become an employment skill and possessing Welsh language skills will increasingly over time give individuals a competitive advantage when seeking employment.

### **‘Does learning through the medium of Welsh segregate English speaking pupils/families?’**

On the contrary, learning through the medium of Welsh provides all children with opportunity to become fully bilingual with the skills to be able to read, write and speak in both Welsh and English languages by the time that they leave primary school. In Welsh medium schools, children receive their education principally through the medium of Welsh with English being taught as a subject in Key Stage 2 and used as a medium of instruction. Learning through the medium of Welsh also helps family/community members with the opportunity to develop their Welsh language skills.

### **‘Will children with additional learning needs be able to learn through the medium of Welsh?’**

Carmarthenshire County Council’s policy is that all its schools should be inclusive, with children with additional learning needs being educated in a mainstream setting alongside their peers wherever possible. In the vast majority of cases, this is achieved, with all children benefitting. All pupils with additional learning needs have specific individual plans based on their circumstances and a tailored support programme is provided according to need. Generally, an additional learning need is not a barrier to learning two languages. There will be rare instances, however where a child may be diagnosed with a condition that is not conducive to a fully bilingual education. In these circumstances a package of support is identified by professional practitioners and discussed with parents.

## Carmarthenshire Language Learning Centres

Due to the nature of the county we need to provide a language service to all latecomers so that they can become fully assimilated into our bilingual communities and are steeped in Welsh language and culture. In order to achieve this, we need to address the importance of dedicated facilities to support latecomers to a level where they can easily integrate into the day to day timetable in Welsh medium schools. Thorough research shows that this can be more easily achieved through intensive language courses. Language centres are the vehicles needed to ensure that this becomes a reality. As alluded to above, the language centres will also provide language support for parents and pupils and will also have provision for professional learning and Welsh for Adults.

### Bilingualism in Carmarthenshire

Further information can be found using the following links:

- **Cymraeg gyda'r plant / Welsh with your kids- give it a go!**

[Booklet - Cymraeg gyda'r plant/Welsh with your kids-give it a go!](#)

Within this booklet you will find a number of useful Welsh words and phrases which can be used to practise the Welsh language with young children. This will help them to speak naturally and confidently.

- **Bod yn Ddwylieithog... yn Sir Gâr / Being Bilingual... in Carmarthenshire**

[Booklet- Bod yn Ddwylieithog...yn Sir Gar/Being Bilingual... in Carmarthenshire](#)

This booklet details what it means to be bilingual whilst highlighting the advantages that can be achieved from being bilingual in areas such as education, career, health and life. In addition, within this booklet you will find the answers to many common parental concerns regarding the Welsh language.

- **Welcome to Wales    Welcome to Carmarthenshire    Welcome to Welsh**

[Booklet- Welcome to Wales    Welcome to Carmarthenshire    Welcome to Welsh](#)

This booklet has been prepared by Carmarthenshire County Council to welcome newcomers to its bilingual County. Within the booklet you will find information on how the Welsh language is used in Carmarthenshire along with details on where you can find Welsh language support and useful websites to visit to develop your Welsh language.





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## EXECUTIVE BOARD

21<sup>ST</sup> DECEMBER 2020

### MODERNISING EDUCATION PROGRAMME

#### PROPOSAL TO RECONFIGURE AND REMODEL BEHAVIOUR SUPPORT SERVICES AT YSGOL RHYDYGORS TO IMPROVE PROVISION FOR CHILDREN AND YOUNG PEOPLE

##### Recommendations / key decisions required:

It is recommended that the Executive Board approves:

1. The proposal as outlined below and in the attached consultation document;
2. Officers to initiate formal consultation on the proposal;
3. That a report is submitted to the Executive Board at the end of the consultation period.

##### Reasons:

To comply with statutory procedures and guidance in relation to school re-organisation.

##### Relevant Scrutiny Committee Consulted: Yes – 23/11/2020

The Education and Children Scrutiny Committee unanimously resolved:

- That the proposal to remodel Behaviour Support Services at Ysgol Rhydygors, as detailed in the report, be endorsed;
- That it be recommended to the Executive Board that a formal consultation process be initiated

##### Council Decision Required

NO

##### Executive Board Member Portfolio Holder: Cllr. Glynog Davies (Education & Children)

##### Directorate:

Education & Children

##### Designations:

Head of Access to Education

##### Tel: Email addresses:

01267 246471

[SiDavies@cararthenshire.gov.uk](mailto:SiDavies@cararthenshire.gov.uk)

**Name of Head of Service:** Simon Davies

**Report Author:**  
Sara Griffiths

Modernisation Team  
Manager

01267 246618

[SMGriffiths@cararthenshire.gov.uk](mailto:SMGriffiths@cararthenshire.gov.uk)

# EXECUTIVE SUMMARY EXECUTIVE BOARD

21<sup>ST</sup> DECEMBER 2020

## MODERNISING EDUCATION PROGRAMME

### PROPOSAL TO RECONFIGURE AND REMODEL BEHAVIOUR SUPPORT SERVICES AT YSGOL RHYDYGORS TO IMPORVE PROVISION FOR CHILDREN AND YOUNG PEOPLE

#### Background

Following a strategic review of the Local Authority's Behaviour Services, the LA aims to move from a silo focus on behaviour to a more universal approach to include pupil wellbeing and engagement. To achieve this the LA has developed a Four Phase Model of its behaviour services which includes providing behaviour and engagement support on four levels. Support ranges from intervention and support in mainstream schools to specialised respite or residential placements.

This proposal supports the realisation of the Four Phase Model. Currently, the Local Authority have a range of settings in which pupils with SEBD are supported. This includes Ysgol Rhydygors, Carmarthenshire Secondary Teaching and Learning Centre (Pupil Referral Unit for secondary pupils), Canolfan Bro Tywi (Pupil Referral Unit for primary pupils) and Canolfan y Gors (Pupil Referral Unit for secondary pupils with significant anxiety and/or emotional wellbeing and mental health issues requiring the support of CAMHS-Child and Adolescent Mental Health Services).

The vision of the four-phase model includes encouraging each of these settings to work together as one Specialist Behaviour and Wellbeing Support Service Team. One of the principal ways of achieving this is to create consistency in the type of provision offered at each of the settings and to create a system ensuring that links with mainstream schools.

At the current time, once a child is placed in Rhydygors, the historical evidence suggests that the young person remains there until they are 16 with no further mainstream experience.

The new Four Phase Model is developing behaviour support services to allow easier access to early intervention so that schools have direct access to a link Behaviour Support Service team member who will be trained in restorative approaches, trauma informed practices and have continuous professional development to support the needs of their cluster of schools. Members of the Behaviour Support Community team are supported by their line Manager, the Lead Officer for Behaviour Support Services and PRUs and an ECP with senior responsibility for behaviour to address any young people that they feel they need advice, support and guidance with so that any training will be approved to meet the needs of the young learners and the schools they attend.



As the Behaviour Support Community Team and PRUs will come under Phase 3 management there will be consistency in training programmes, ethos development, curriculum offer and the development of trauma informed practitioners in a trauma informed setting and psychological informed environments (PIE).

By having regular and link access to Behaviour Support Community Team staff we will have greater opportunity to work with our learners at an earlier stage for intervention and allow us through multi-agency meetings and possibly TAPPAS (Teams Around Pupils Parents and Settings), currently a pilot project in the local authority, we will be able to develop creative and innovative support packages at the earliest possible time to keep our learners in mainstream if this is the most appropriate setting.

There are always learners who have complex needs and require robust support packages outside of mainstream provision but our ethos supports inclusivity and developing needs led support and services. Within the Four Phase model when a child is recommended for a place in Phases 3 or 4 there should always be the opportunity for transition back to mainstream, or even access mainstream for subjects that they engage with positively and the learning of others is not negatively impacted, when the young person can regulate emotions and engage in their education in a positive and safe manner. This can be undertaken by continuous monitoring and assessment and with close, transparent and trusting relationships with our mainstream schools.

For the reasons of consistency, access to highly specialist support, access to a broad and balanced curriculum with a range of accreditation options and the offer of individual and bespoke education plans offered in the current PRUs through the 3 Tiered approach, there is a requirement to discontinue Ysgol Rhydygors as a special school and establish it as a Pupil Referral Unit. This proposal will initiate this change.

Whilst it is acknowledged that Ysgol Rhydygors has been providing education for pupils with social, emotional, and behavioural difficulties (SEBD) in the form of a special school for a number of years, it is recognised that an enhancement of the PRU model will more appropriately cater for the needs of society and its young people providing consistent opportunities across the county.

## The Proposal

1. In line with the School Organisation Code (2018) the Local Authority proposes to:  
**Discontinue Ysgol Rhydygors Special School as of the 1st January 2022**

All former Ysgol Rhydygors pupils will continue to receive their education on the site of the former Ysgol Rhydygors school. If approved, instead of receiving provision in a special school, pupils will be educated in a Pupil Referral Unit (PRU).

Whilst the proposal should be considered as a whole. This consultation document relates to Point 1 only. Points 2 and 3 noted below will be undertaken via separate procedures.

2. Should the above (Point 1) be approved, the Local Authority will establish a Pupil Referral Unit (PRU) on the site of the former Ysgol Rhydygors school as of the 1st January 2022.

3. Additionally, should Point 1 be approved, the Local Authority will establish a Children's Home/Respite Centre on the site of the former Ysgol Rhydygors school/Residential Unit as of the 1st January 2022.

All former Ysgol Rhydygors pupils who have an element of residential education as part of their SEN Statement will continue to receive this on the site of the former Ysgol Rhydygors school.

### **Recommendation**

It is recommended that the Executive Board approves to proceed with the proposal as outlined above and a formal consultation be initiated.

<b>DETAILED REPORT ATTACHED?</b>	<b>YES: Draft Consultation Document</b>
----------------------------------	---

# IMPLICATIONS

I confirm that other than those implications which have been agreed with the appropriate Directors / Heads of Service and are referred to in detail below, there are no other implications associated with this report:

Signed: *S. Lewis* Head of Access to Education

Policy, Crime & Disorder and Equalities	Legal	Finance	ICT	Risk Management Issues	Staffing Implications	Physical Assets
<b>YES</b>	<b>YES</b>	<b>YES</b>	<b>NONE</b>	<b>YES</b>	<b>YES</b>	<b>YES</b>

## 1. Policy, Crime & Disorder and Equalities

Developments are consistent with the Authority's Corporate Strategy and the Modernising Education Strategic Outline Programme.

## 2. Legal

Appropriate consultation will need to be initiated in accordance with the relevant statutory procedures.

## 3. Finance

Revenue implications will be catered for within the Local Management of Schools Fair Funding Scheme.

## 4. ICT

None.

## 5. Risk Management Issues

If the proposal is not implemented the local authority will continue to provide inconsistent SEBD provision to pupils across the County.

## 6. Staffing Implications

Staffing implications will be addressed in accordance with the County Council's Policy and Procedures.

## 7. Physical Assets

The Ysgol Rhydygors site will continue to be used for Education purposes. It will be the location of the Pupil Referral Unit and Children's Home/Respite Centre.

## CONSULTATIONS

<p><b>I confirm that the appropriate consultations have taken in place and the outcomes are as detailed below</b></p>	
<p><b>Signed:</b></p>	<p style="text-align: center;"><i>S. Davies</i> <b>Head of Access to Education</b></p>
<p><b>1. Scrutiny Committee –</b> Consulted on 23/11/2020.</p> <p>The Education and Children Scrutiny Committee unanimously resolved:</p> <ul style="list-style-type: none"> <li>• That the proposal to remodel Behaviour Support Services at Ysgol Rhydygors, as detailed in the report, be endorsed;</li> <li>• That it be recommended to the Executive Board that a formal consultation process be initiated</li> </ul>	
<p><b>2. Local Member(s) –</b> The local members will be notified of the proposal and will be consulted during the formal consultation period.</p>	
<p><b>3. Community / Town Council –</b> Will be consulted during the formal consultation period.</p>	
<p><b>4. Relevant Partners –</b> Will be consulted during the formal consultation period.</p>	
<p><b>5. Staff Side Representatives and other Organisations –</b> Will be consulted during the formal consultation period.</p>	
<p><b>EXECUTIVE BOARD PORTFOLIO HOLDER AWARE/CONSULTED</b></p>	<p style="text-align: center;"><b>YES</b></p>

<b>Section 100D Local Government Act, 1972 – Access to Information</b> <b>List of Background Papers used in the preparation of this report:</b>		
Title of Document	File Ref No.	Locations that the papers are available for public inspection
Stage 1 (Permission to Consult) – ECS Scrutiny Committee Report		<a href="#">AGENDA ITEM NO (gov.wales)</a>
Carmarthenshire’s Welsh in Education Strategic Plan		<a href="https://www.carmarthenshire.gov.wales/home/council-democracy/strategies-and-plans/welsh-in-education-strategic-plan/">https://www.carmarthenshire.gov.wales/home/council-democracy/strategies-and-plans/welsh-in-education-strategic-plan/</a>
MEP Biennial Review		<a href="http://www.carmarthenshire.gov.uk">www.carmarthenshire.gov.uk</a> Executive Board 20 <sup>th</sup> June 2016
21 <sup>st</sup> Century Schools Website		<a href="http://www.21stcenturyschools.org">www.21stcenturyschools.org</a>
School Organisation Code 2018		<a href="https://gov.wales/sites/default/files/publications/2018-10/school-organisation-code-second-edition.pdf">https://gov.wales/sites/default/files/publications/2018-10/school-organisation-code-second-edition.pdf</a>

**Proposal to reconfigure and remodel Behaviour Support Services at Ysgol Rhydygors to improve provision for children and young people**

# Consultation Document

**DRAFT**

[carmarthenshire.gov.uk](http://carmarthenshire.gov.uk)

Cyngor Sir Gâr  
**Carmarthenshire**  
County Council



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## **School Modernisation Section**

**Sara Griffiths**, Modernisation Team Manager

If you require this information in large print, Braille or on audiotape please contact the Department for Education & Children

**Email:** [DECMEP@carmarthenshire.gov.uk](mailto:DECMEP@carmarthenshire.gov.uk)

**Telephone:** 01267 246618

## Foreword

As part of its statutory obligation to keep the number and type of school places under review, the County Council has adopted a wide-ranging programme designed to improve school buildings and enhance opportunities for learning. The strategy reflects the vision and policies established by the County Council which embrace the requirement to deliver services, to clear standards – covering both cost and quality – by the most economic and effective means. In our drive to continually improve on the services made available to all learners, we must maximise the finite resources available to the Council, and continue to work in partnership with all those who have a contribution to make to the process of learning and the wellbeing of both children and their families. Schools of the future will need to serve as a focus for a wide range of services dedicated to serving the needs of the community through a joined up approach.

Carmarthenshire is blessed with many very able education leaders and teachers but the continuing changes to the curriculum places a heavy demand on their skills to meet the wide ranging demands of all children. Although the processes of learning, and skills of teaching, are extremely important, deep subject knowledge on the part of the teacher is essential if learners with their various gifts in different areas are to discover and develop their talents to the full.

Schools designed to meet current demands are expected to provide a broad and balanced curriculum through high quality and inspirational teaching. In the planning of new provision it will be important to ensure that our schools are properly equipped to enhance opportunities for social inclusion, sustainable development, equal opportunities and bilingualism. In practical terms we need to ensure that provision reflects the changing patterns of population, with schools based in the right location with accommodation and facilities fit to serve the needs of all learners in the twenty first century.

Consultation will follow the guidelines established by the Welsh Government and will involve identified interested parties. The information set out in this document is intended to clarify the proposals for your school and support the consultation process.



**Gareth Morgans**  
Director of Education & Children

## Glossary of Abbreviations

ALN	Additional Learning Needs
AN	Admission number
EM	English medium
Estyn	Her Majesty's Inspectorate for Education and Training in Wales
LA	Local Authority
MCSW	Measuring the Capacity of Schools in Wales
MEP	Modernising Education Programme
NOR	Number on Roll
PLASC	Pupil Level Annual School Census Data
PRU	Pupil Referral Unit
SEBD	Social, Emotional and Behavioural Difficulties
SS	Special School
WESP	Welsh in Education Strategic Plan
WG	Welsh Government
WM	Welsh medium



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## Introduction

Carmarthenshire County Council has a legal responsibility to review the number and type of schools it maintains in the area and whether it is making the best use of the resources and facilities to deliver the opportunities that children deserve.

As part of this process the Council has published its vision on how it sees the future for all of the primary and secondary schools in the County and this includes consulting on the future shape of education in Ysgol Rhydygors.

This consultation document outlines current provision and options to determine the optimum solution for meeting future need.

## School(s) affected by the proposal

The catchment area of Ysgol Rhydygors covers the whole of Carmarthenshire therefore all schools will be notified of the proposal.

		<b>Ysgol Rhydygors</b>
<b>School Location</b>		Llansteffan Road Johnstown Carmarthenshire SA31 3NQ
<b>Age Range</b>		7-16
<b>School Category</b>		Special School
<b>Language Category</b>		English Medium/Bilingual
<b>Number of pupils January 2020 (of which are residential pupils)</b>		37 (4)
<b>Number of pupils previously on the register (of which are residential pupils)</b>	<b>January 2019</b>	45 (6)
	<b>January 2018</b>	46 (7)
	<b>January 2017</b>	46 (11)
	<b>January 2016</b>	38 (12)
<b>Pupil Projections</b>	<b>January 2021</b>	N/a
	<b>January 2022</b>	N/a
	<b>January 2023</b>	N/a
	<b>January 2024</b>	N/a
	<b>January 2025</b>	N/a
<b>Capacity</b>		46
<b>Cost per pupil (2020/21)</b>		£44,049
<b>School Budget (2020/21)</b>		£1,982,000
<b>Estyn Inspection Result</b>		<a href="#">Estyn</a>
<b>Building Condition Category</b>		C (Poor)

## Estyn Inspections

As part of a national programme of school inspections, Estyn commissions reviews of all schools. The most recent Estyn inspection for Ysgol Rhydygors took place in November 2019 and consultees may access the finding either via the Estyn website at [www.estyn.gov.uk](http://www.estyn.gov.uk) or you may request a copy from the Local Authority (for which a charge in respect of photocopying may be made).

Estyn use a four-point judgement scale to evaluate a provider's effectiveness:

Judgement	What the judgement means
Excellent	Very strong, sustained performance and practice
Good	Strong features, although minor aspects require improvement
Adequate and needs improvement	Strengths outweigh weaknesses, but important aspects require improvement
Unsatisfactory and needs urgent improvement	Important weaknesses outweigh strengths.

The inspection judgements for Ysgol Rhydygors are shown in the following table:

Inspection Area	Judgement
Standards	Adequate and needs improvement
Wellbeing and attitudes to learning	Adequate and needs improvement
Teaching and learning experiences	Adequate and needs improvement
Care, support and guidance	Adequate and needs improvement
Leadership and management	Adequate and needs improvement

## Current Provision/Background

Ysgol Rhydygors is a purpose built maintained residential special school in the town of Carmarthen. It is important to note that Ysgol Rhydygors is the only special school within the region providing education for pupils with social, emotional, and behavioural difficulties (SEBD). The school provides special education for pupils between the age of 7 and 16 years old. There is capacity to cater for up to 46 pupils with significant social, emotional, and behavioural difficulties (SEBD) requiring a specialised long-term day or residential placement.

Currently there are 37 pupils on roll. All pupils have a statement of special educational needs (SEN) or an individual development plan (IDP) principally for social, emotional, and behavioural difficulties. Many pupils attend the school from within the local authority and a few come from neighbouring local authorities. Nearly all pupils are from English-speaking backgrounds. Around 54% of pupils receive free school meals. Less than 20% of pupils are looked after by the local authority.

The school provides a personalised and adaptive curriculum. Opportunities for pupils to access purposeful learning opportunities develop engagement. The school continues to improve its approach to developing the skills of the pupils through this curriculum.

The school's most recent Estyn inspection, November 2019, judged the school to be 'adequate and needs improvement' in all five inspection areas. The school was placed in Estyn Review.

The current leadership structure of the school includes an acting headteacher, who was appointed in September 2018, and a senior leadership team that is made up of a pastoral lead, a business manager a head of care and an assistant head teacher.

### Capacity Information

	Jan 16	Jan 17	Jan 18	Jan 19	Jan 20
Total Capacity	46	46	46	46	46
Pupil Numbers*	38*	46*	46*	45*	37*
Residential pupil numbers	12	11	7	6	4
Surplus	8	0	0	1	9
% Surplus	17%	0%	0%	0.2%	20%

\*Includes residential pupils

As can be seen from the table above, surplus capacity at Ysgol Rhydygors has been limited in the last five years which demonstrates that demand for SEBD provision is high within the Carmarthen area.

## Rationale for Change

Following a strategic review of the Local Authority's Behaviour Services, the LA aims to move from a silo focus on behaviour to a more universal approach to include pupil wellbeing and engagement. To achieve this the LA has developed a Four Phase Model of its behaviour services which includes providing behaviour and engagement support on four levels. Support ranges from intervention and support in mainstream schools to specialised respite or residential placements.

This proposal supports the realisation of the Four Phase Model. Currently, the Local Authority have a range of settings in which pupils with SEBD are supported. This includes Ysgol Rhydygors, Carmarthenshire Secondary Teaching and Learning Centre (Pupil Referral Unit for secondary pupils), Canolfan Bro Tywi (Pupil Referral Unit for primary pupils) and Canolfan y Gors (Pupil Referral Unit for secondary pupils with significant anxiety and/or emotional wellbeing and mental health issues requiring the support of CAMHS-Child and Adolescent Mental Health Services).

The vision of the four-phase model includes encouraging each of these settings to work together as one Specialist Behaviour and Wellbeing Support Service Team. One of the principal ways of achieving this is to create consistency in the type of provision offered at each of the settings and to create a system ensuring that links with mainstream schools.

At the current time, once a child is placed in Rhydygors, the historical evidence suggests that the young person remains there until they are 16 with no further mainstream experience.

The new Four Phase Model is developing behaviour support services to allow easier access to early intervention so that schools have direct access to a link Behaviour Support Service team member who will be trained in restorative approaches, trauma informed practices and have continuous professional development to support the needs of their cluster of schools. Members of the Behaviour Support Community team are supported by their line Manager, the Lead Officer for Behaviour Support Services and PRUs and an ECP with senior responsibility for behaviour to address any young people that they feel they need advice, support and guidance with so that any training will be approved to meet the needs of the young learners and the schools they attend.

As the Behaviour Support Community Team and PRUs will come under Phase 3 management there will be consistency in training programmes, ethos development, curriculum offer and the development of trauma informed practitioners in a trauma informed setting and psychological informed environments (PIE).

By having regular and link access to Behaviour Support Community Team staff we will have greater opportunity to work with our learners at an earlier stage for intervention and allow us through multi-agency meetings and possibly TAPPAS (Teams Around Pupils Parents and Settings), currently a pilot project in the local authority, we will be able to develop creative and innovative support packages at the earliest possible time to keep our learners in mainstream if this is the most appropriate setting.

There are always learners who have complex needs and require robust support packages outside of mainstream provision but our ethos supports inclusivity and developing needs led support and services. Within the Four Phase model when a child is recommended for a place in Phases 3 or 4 there should always be the opportunity for transition back to mainstream, or even access mainstream for subjects that they engage with positively and the learning of others is not negatively impacted, when the young person can regulate emotions and engage in their education in a positive and safe manner. This can be undertaken by continuous monitoring and assessment and with close, transparent and trusting relationships with our mainstream schools.

For the reasons of consistency, access to highly specialist support, access to a broad and balanced curriculum with a range of accreditation options and the offer of individual and bespoke education plans offered in the current PRUs through the 3 Tiered approach, there is a requirement to discontinue Ysgol Rhydygors as a special school and establish it as a Pupil Referral Unit. This proposal will initiate this change.

Whilst it is acknowledged that Ysgol Rhydygors has been providing education for pupils with social, emotional, and behavioural difficulties (SEBD) in the form of a special school for a number of years, it is recognised that an enhancement of the PRU model will more appropriately cater for the needs of society and its young people providing consistent opportunities across the county.

It is the Authority's intention to establish a Pupil Referral Unit (PRU) on the former Ysgol Rhydygors site as an alternative means of provision. It must be noted, that the establishment of a PRU (in place of Ysgol Rhydygors Special School) should be considered separate to this consultation and will be carried out via separate procedures following the necessary determination of the proposal described within this consultation document.

## The Proposal

1. In line with the School Organisation Code (2018) the Local Authority proposes to: **Discontinue Ysgol Rhydygors Special School as of the 1<sup>st</sup> January 2022.**

All former Ysgol Rhydygors pupils will continue to receive their education on the site of the former Ysgol Rhydygors school. If approved, instead of receiving provision in a special school, pupils will be educated in a Pupil Referral Unit (PRU).

Whilst the proposal should be considered as a whole. This consultation document relates to Point 1 only. Points 2 and 3 noted below will be undertaken via separate procedures.

2. Should the above (Point 1) be approved, the Local Authority will establish a Pupil Referral Unit (PRU) on the site of the former Ysgol Rhydygors school as of 1<sup>st</sup> January 2022.
3. Additionally, should Point 1 be approved, the Local Authority will establish a Children's Home/Respite centre on the site of the former Ysgol Rhydygors school/Residential Unit as of 1<sup>st</sup> January 2022.

All former Ysgol Rhydygors pupils who have an element of residential education as part of their SEN Statement will continue to receive this on the site of the former Ysgol Rhydygors school.

To coincide and further develop the proposals, the Local Authority are currently in the process of progressing an ICF funding application to develop a new, 21st century children's home. This will hopefully enhance the children's home model and provision available and will meet the needs of children both locally and regionally. Whilst the application is in the very early stages of conception, early indications are initially positive due to the need for provision development.

### What does the proposal mean?

Should the proposal described in this consultation document be approved, Ysgol Rhydygors will close as a Special School. The school site will be used for the provision of a Pupil Referral Unit (PRU) which will be established (via separate procedures) subject to the determination of the proposal described within this document. In addition, the Local Authority will establish a Children's Home/Respite centre on the site of the former Ysgol Rhydygors for current Ysgol Rhydygors residential pupils and future pupils at the proposed PRU will continue to have the option of accessing a residential educational component as part of their education plans.

Canolfan Bro Tywi (PRU for primary aged pupils) and the Behaviour Support Community Team who are co-located on the site will not be affected by the proposal outlined in this consultation document.

## What is a PRU?

A PRU is a type of school established and maintained by a local authority to provide suitable education for children and young people who, by reason of illness, exclusion or otherwise, may not receive such education (section 19 of the Education Act 1996).

More detail on the management of PRUs can be found in the following document: [The Education \(Pupil Referral Units\) \(Management Committees etc.\) \(Wales\) Regulations 2014](#)

The LA are responsible for the resourcing, organisation and maintenance of a PRU.

## Advantages and Disadvantages of the proposal

### Advantages

- The Behaviour Support Team can ensure that referrals to our provision will be on the basis of a comprehensive assessment of the pupil's needs and aspirations, with input from the pupil and his/her parents or carers, to ensure that the selected provision is a good match.
- Provision will be an individualised package often involving more than one provider (the school and the PRU) as even pupils with similar socio-economic backgrounds or with ALN can vary enormously in their needs.
- Assessment will include understanding pupils' aspirations for post-16 to ensure that the academic and/or vocational offer supports their progression. This will mean effective collaboration between the PRU, school and wider providers.
- Teachers will adapt programmes and tasks to the individual needs and learning styles of pupils.
- The behaviour support service will support a curriculum that include core skills, including maths, Welsh and English, along with a vocational offer involving work placements.
- The behaviour support service will offer a curricula which provide opportunities for engagement with the wider community which are beneficial and motivating for pupils.
- Partnership approaches with mainstream schools will support successful reintegration as well as having the potential for the two types of schools to learn from each other.
- Working as part of a wide behaviour service will allow pupils to be given appropriate choices enhances the capacity of young people to act independently and make positive choices
- Th wider behaviour support team will focus on delivering specialised emotional wellbeing interventions to help students develop the self-management skills they need to make successful transitions back into mainstream schools, into work or further education.
- The wider behaviour service will be able to provide a wide range of specialist staff who are well trained, caring and knowledgeable with the confidence and competence to make positive relationships and effect change



- An integrated model with the mainstream school will ensure that teachers have expertise in the subjects they are teaching.

## **Disadvantages**

- Initially schools will be nervous that a long-term school provision will not be available in more complex cases.
- Delays in obtaining all the relevant information from referring schools meaning that some students start without the most effective provision in place for them.

## **Impact on SEN**

The creation of a PRU to cater for the needs of a diverse range of pupils of all ages with SEBD on one co-located site will support the improvement in the quality and standards of provision by enabling an alignment in the quality and standard of provision offered to pupils with SEBD across the Authority. Joint professional development opportunities for teaching staff and behaviour support practitioners will strengthen the LA's specialised SEBD provision offer and it will support innovative behaviour practice, widen the range of relationship interventions and approaches and enhance opportunities for the development and provision of a pupil-led personalised curriculum and opportunities for meaningful family engagement.

The proposal will strengthen the LA's behaviour outreach element of provision to form strong and effective links to mainstream schools and support pupils to reengage with mainstream education as quickly as change has been affected. It will build capacity in mainstream schools to make inclusive provision for pupils with complex behaviour difficulties and meet the needs of SEBD pupils within their local community.

## **WESP**

The Local Authority is committed to providing a bilingual service to Carmarthenshire's learners. The Authority recognises that bilingual provision in our Special Schools and Units is currently limited. We will work with these settings in developing bilingual provision to ensure that learners with additional learning needs can access bilingual provision and support in their chosen language. This meets section 63 of the ALN Act 2018 but also meets the expectations of ALNET.

## Risks and Counter Measures

Risk		Counter Measure
1.	Failure to obtain statutory approval to implement process.	- Follow guidelines as set out in the School Organisation Code 2018
2.	An unsatisfactory consultation with the community	- Develop communication strategy and consult on a regular basis to address concerns

## Staffing

Staffing implications will be addressed in accordance with the County Council's Redeployment Policy and Procedures.

The Local Authority has staffing policies and procedures in respect of school reorganisation and these will be implemented if required. The Authority will support school staff in securing suitable alternative employment if at all possible, through redeployment processes should this be necessary.

## Financial Implications

Ysgol Rhydygors is funded in accordance with the School Funding Regulations 2010 (Wales) and the County Council's Scheme for Financing Schools, receiving an annual delegated budget based on previous years costs and budget allocations and amended for any changes in provision agreed in advance with the LA. As with all school delegated budgets the schools carry forward their surplus / deficit school balances into the next financial year.

A PRU is a centrally managed resource and therefore a new budget allocation will need to be agreed from within existing resources or from reducing the schools' delegated budget as a result of the closure of Ysgol Rhydygors.

## Admissions Arrangements

Whilst the Local Authority is highly committed to inclusion and to educating as many of its children and young people within their local communities there are some pupils who present with significant, persistent challenges relating to their Social, Emotional and Behaviour Difficulties ("SEBD") and require specialised long-term day or residential SEBD provision in Ysgol Rhydygors. Admission is considered for pupils in KS2, KS3 and KS4.

All requests for admission to Ysgol Rhydygors are considered on behalf of the Director at the LA's Inclusion Panel. This Panel recommends placements in Ysgol Rhydygors

and is the only route by which a child or young person can enter Ysgol Rhydygors. This panel meets fortnightly and is chaired by an Additional Learning Needs Manager. The Inclusion Panel additionally comprises Inclusion Department Officers, an Educational and Child Psychologist, ALNCo and Head Teacher representatives of special and mainstream schools. Attendance is on a rotational basis. Papers are distributed in advance of the panel meeting electronically and all evidence, including parental and children and young peoples' views, is considered prior to a placement being recommended.

In making a decision the Inclusion Panel considers whether the SEBD of the child or young person meet the criteria for entry to Ysgol Rhydygors evidenced by a Statement of SENs or an Individual Development Plan that includes an Educational and Child Psychologist Consultation Record outlining SEBD and parental agreement.

This admissions process to attend PRUs is through the same process requiring inclusion panel documentation to be completed with consent and agreements from schools, parent(s)/carer(s) and pupils and requires a consultation with the schools link ECP to recommend a PRU placement. The placement panel requests are discussed and agreed in the Inclusion Panel and signed off by managers and the Director before a place is formally offered.

## **Transitional Arrangements**

If this proposal is implemented pupils registered at Ysgol Rhydygors Special School prior to the implementation of the proposal will automatically be admitted to the PRU from 1<sup>st</sup> January 2022.

Pupils currently attending Ysgol Rhydygors Special School will be registered at the PRU. From 1<sup>st</sup> January 2022 those pupils with statements at annual review will be transferred to IDPs in line ALN Reform and the governments transference timetable which is yet to be published.

## Alternative Options Considered

In developing a preferred option, the Authority considered a range of alternative options.

Option 1	Status Quo	Does not address the variation in provision for pupils with SEBD in Carmarthen.
Option 2	Discontinue Ysgol Rhydygors and provide for pupils in the current Carmarthenshire Secondary Teaching and Learning Centre	Insufficient capacity in Carmarthenshire's Secondary Teaching and Learning Centre to accommodate Ysgol Rhydygors pupils.
Option 3	Discontinue Ysgol Rhydygors and cater for pupils in mainstream schools	Schools will require specialist support that cannot be delivered in mainstream.
Option 4 (Preferred)	Discontinue Ysgol Rhydygors and provide for pupils in a new Pupil Referral Unit (PRU) on the Ysgol Rhydygors school site.	Creates consistency in the quality and standard of provision on offer for pupils with SEBD in Carmarthenshire and limits disruption for pupils.
Option 5	Discontinue Ysgol Rhydygors and provide no alternative provision	Does not cater for the needs of pupils with SEBD in Carmarthen.

## Transport Impact Assessment

Transport will be provided in accordance with the Council's School Transport Policy.

## Community Impact Assessment

Please refer to Appendix A of this consultation document for full details of the Community Impact Assessment undertaken

## Welsh Language Impact Assessment

Please refer to Appendix B of this consultation document for full details of the Welsh Language Impact Assessment undertaken

## Equality Impact Assessment

Please refer to Appendix C of this consultation document for full details of the Equality Impact Assessment undertaken

## Evaluation of Present Arrangements

Overall, the standards pupils achieve at Rhydygors are adequate and in need of improvement.

### **R1: Raise standards and improve pupils' literacy and numeracy skills**

Many pupils make steady progress in developing their skills, with the development of physical skills a strength. The planning and teaching of skills across the curriculum is satisfactory, particularly in literacy and when developing problem-solving skills. There is minimal evidence of impact.

The wellbeing and attitudes to learning at Rhydygors are adequate and need improvement.

### **R2 Improve pupils' behaviour and attitudes to learning**

Working relationships between staff and pupils are strong. Most pupils feel safe in school. The majority of pupils behave, follow routines and apply themselves appropriately. However, the behaviour of a few older pupils is a concern for younger pupils. A minority of older pupils and a few younger pupils do not always engage well with their learning.

Teaching and learning experiences at Rhydygors are adequate and need improvement

### **R3 Improve the quality of teaching and the effectiveness of assessment**

As a result of trusting relationships, pupils build their confidence and respond to challenge. However, a minority of staff do not employ behaviour strategies that support engagement and progress. Pupils are provided with a good range of learning experiences. However, provision for skills across the curriculum is at an early stage. The school is beginning to act but whole school impact is not yet evident. Most teachers' subject knowledge ensures that planning meets pupils' needs. However, in a minority of classes, teachers do not plan well enough and limits progress.

Care, support, and guidance at Rhydygors are adequate and need improving.

Leadership and management at Rhydygors are adequate and needs improvement

### **R4 Strengthen improvement planning**

Monitoring activities to establish strengths and areas for development are appropriate. The school tracks and monitors pupils' behaviour efficiently. However, the impact of analysis has not had sufficient impact for a minority of pupils.

The governing body is developing a broader understanding of the support needs required to ensure a positive impact. However recent evaluation of action plans evidence insufficient improvement. There is still insufficient understanding of how to use support effectively and the pace of change remains slow.

### **R5 Improve the learning environment**

The school communicates its vision and values. However, the expertise of staff and the learning environment requires consideration. There has been recent improvement in terms of safety and access to the outdoors.

## Impact of the proposal

The discontinuation of Ysgol Rhydygors and the creation of a PRU to cater for the needs of a diverse range of pupils of all ages and stages of development on one co-located site will ensure a consistent approach to the relevant teaching strategies across all key stages, including the foundation phase. Key consideration to how all pupils to access the outdoors and the wider community will be aligned under the local authority's vision for an improvement in the quality and standards of provision and greater aspiration for the learning and progress of all pupils.

This will be underpinned by the local authority's specialist behaviour practices and family engagement programmes, including greater links to support and collaborate with mainstream schools. There will be greater opportunities for early identification and planned bespoke programmes that focus on reintegration where possible. It will build capacity in mainstream schools, so that systemic change leads to improvement.

Whilst we develop our specialist team and work closely with mainstream schools, we will be developing further our relationship models around the consistent use of restorative practices and ethos in our schools and settings. Closer working with mainstream schools and the PRUs and specialist behaviour support services will also allow for increased opportunity to develop intensive and robust training opportunities for schools to train alongside specialist staff to develop trauma informed practice for those complex learners who find regulating their emotions a daily challenge.

Consistent professional development opportunities for teaching and support staff will be planned from national, regional, and local expectations and coherently monitored for impact by a range of multi-agency officers.

## The Consultation Process

The consultation on this proposal will follow guidelines established by the Welsh Government as stated in the School Organisation Code (2018).

### Who will be consulted?

This document will be sent to the following interested parties:

Staff (Teaching and Ancillary)	Director of Education – All Neighbouring Authorities
Governors and Parents/Guardians	Diocesan Director of Education Church in Wales and RC
Local County Councillors	Estyn
Community Councillors	Regional Transport Consortium
Members of the Senedd (MSs) / Regional Members / Members of Parliament (MP)	*All schools within Carmarthenshire
Welsh Ministers	All relevant unions
SEN Partners	Welsh Language Commissioner
LA Special Educational Needs Division	Local Police and Crime Commissioner
ERW – Education through Regional Working	Flying Start
	Child Care / Early Years
Communities for Work +	Public Services Board
Communities for Work	Legacy
Fusion	Families First Carmarthenshire

\* Consultation document sent to Headteacher and Chair of Governors of all Primary and Secondary Schools in Carmarthenshire.

## Consultation Period

The consultation period for the proposals starts on 11<sup>th</sup> January 2021 and ends on 21<sup>st</sup> February 2021.

Consultees can submit their views in favour of or against a proposal. Responses received during the consultation period will not be treated as statutory objections. If consultees wish to object, they will need to do so in writing during the statutory objection period outlined on page 19.

### Considering your views

During the consultation period you can ask questions and express your views by writing a letter to the address below or by completing an online survey using the following link:

**INSERT LINK**

Letters should be sent to the following address by no later than noon on 21<sup>st</sup> February 2021:

Mr Gareth Morgans, Director of Education and Children's Services,  
Building 2, St. David's Park, Jobs Well Road, Carmarthen, SA31 3HB  
Or E-mail to: [DECMEP@carmarthenshire.gov.uk](mailto:DECMEP@carmarthenshire.gov.uk)

### Drop in sessions

Due to the ongoing implications of the Coronavirus issue we have been advised to postpone all events where there is interaction between staff, parents and the wider community and as a result there will not be a drop in session to discuss proposals. Should you feel strongly about discussing the proposals please contact Miss Isabelle Mariani by sending an e-mail to [DECMEP@carmarthenshire.gov.uk](mailto:DECMEP@carmarthenshire.gov.uk) and a virtual meeting can be arranged.

### Consultation with Pupils

There will be an opportunity for the pupils of the schools subject to the proposals to participate in the consultation process during a session which will be conducted at the schools.

The information gathered from the consultation with pupils will form part of the consultation report which will be submitted to the Executive Board for consideration following the consultation period.

## Consultation Report

A Consultation Report will be published on Carmarthenshire County Council's website at least 2 weeks before a decision is made on whether or not to proceed to publish a statutory notice. Hard copies of the report will also be available on request. The report will summarise the issues raised by consultees and provide Carmarthenshire County



Council's response to these issues. The report will also contain Estyn's view of the proposal and details of consultation undertaken with the pupils.

The Executive Board of Carmarthenshire County Council will consider the consultation report and decide whether or not to proceed with the proposal.

If the Executive Board decides to continue with the proposal Carmarthenshire County Council must publish a statutory notice.

### **Statutory Notice**

The statutory notice will be published on Carmarthenshire County Council's website and posted at the schools subject to proposals. Copies of the notice will be made available to the schools to distribute to pupils, parents, guardians, and staff members (the schools may also distribute the notice by email).

#### **Statutory Objection Period**

The statutory notice will set out the details of the proposal and invite anyone who wishes to object to do so in writing within a period of 28 days. If objections are received an objection report will be published on the Carmarthenshire County Council website. Hard copies of the report will also be available on request. The report will summarise the issues raised and provide Carmarthenshire County Council's response to those objections.

### **Determination of Proposal**

Carmarthenshire County Council will determine the proposal. The County Council may decide to approve, reject or approve the proposal with modifications. In doing so, the County Council will take into account any statutory objections that it received.

#### **Decision Notification**

Following determination of proposals all interested parties will be informed and advised of the availability of the decision which will be published electronically on Carmarthenshire County Council's website.

## The Statutory Process Time-Table

The statutory process and timetable will be as follows:

11 <sup>th</sup> January 2021	Issue of this consultation document to identified and other interested parties.
21 <sup>st</sup> February 2021	Closing date for views on the proposal to be received by the Department for Education and Children.
27 <sup>th</sup> April 2021	<p>A Consultation Report will be taken to the Executive Board for a decision on whether or not to proceed to publish a statutory notice. OR alternatively proposal ends.</p> <p>The Consultation Report will be published on Carmarthenshire County Council's website at least 2 weeks prior to the publication of a statutory notice.</p> <p>If the decision is made to proceed then a statutory notice will be published. The notice will outline details of the proposal and be published on the Council's web site and be displayed near the entrance of the school and schools which are subject to the proposals. Copies of the notice will be made available to the school to distribute to parents, guardians and staff members.</p> <p>Following publication there will be a 28 day period during which time formal written objections will be invited.</p> <p>The statutory notice will give details on how you may record your objections to the proposal.</p>
8 <sup>th</sup> June 2021	End of formal 28 day notice period for objections. County Council will determine the proposal. The County Council may decide to approve, reject or approve the proposal with modifications, in doing so the County Council will take into account any statutory objections received.
July 2021	<p>Deadline to notify parents of intention to implement proposal.</p> <p>Following determination of proposals all interested parties will be informed and advised of the availability of the decision which will be published electronically on Carmarthenshire County Council's website.</p>

## **Appendix A – Community Impact Assessment**

Ysgol Rhydygors is located within the Carmarthen Town South ward, the ward profile can be viewed by clicking on the following link [Carmarthen Town South Ward](#)

### **Community Impact**

If the proposal is implemented there will be no change for the community. Ysgol Rhydygors school site will continue to be used for education purposes and be maintained by the Local Authority.

### **Other facilities or services provided by the school e.g. after school clubs/ community Library**

The school via the residential team offer after-school provision for primary aged pupils on a needs led basis. This is a wrap around service supporting the pupil and their family by providing afterschool care and support from 3-7pm.

Due to the residential element of the school being active from the end of the school day, the school is not offered for use by the local community outside of school hours.

## Appendix B – Welsh Language Impact Assessment

Carmarthenshire County Council's vision is to provide a service, which will ensure access to high quality learning opportunities for all children, young people and adults, this enabling the achievement of their full potential within the context of the unique bilingual nature of the county.

The language category of Ysgol Rhydygors is English Medium/Bilingual.

The school's most recent Estyn inspection (November 2019) noted that 'Many pupils develop basic Welsh language skills largely competently in different subjects. For example, in mathematics, the majority of pupils recognise numbers in Welsh and use them to give their answers correctly. Welsh first language pupils speak confidently on a range of topics in both Welsh and English. However, these pupils do not always extend their learning and achieve appropriate levels of accreditation because the focus in lessons is on materials suitable for Welsh second language.'

## **Appendix C – Equalities Impact Assessment**

### **Carmarthenshire County Council Assessing Impact**

#### **The Equality Act 2010**

The Equality Act 2010 (the Act) brings together and replaces the previous anti-discrimination laws with a single Act. It simplifies and strengthens the law, removes inconsistencies and makes it easier for people to understand and comply with it. The majority of the Act came into force on 1 October 2010.

The Act includes a new public sector equality duty (the ‘general duty’), replacing the separate duties on race, disability and gender equality. This came into force on 5 April 2011.

#### **What is the general duty?**

The aim of the general duty is to ensure that public authorities and those carrying out a public function consider how they can positively contribute to a fairer society through advancing equality and good relations in their day-to-day activities. The duty ensures that equality considerations are built into the design of policies and the delivery of services and that they are kept under review. This will achieve better outcomes for all.

The duties are legal obligations. Failure to meet the duties may result in authorities being exposed to legal challenge.

Under equality legislation, public authorities have legal duties to pay ‘due regard’ to the need to eliminate discrimination and promote equality with regard to race, disability and gender, including gender reassignment, as well as to promote good race relations. The Equality Act 2010 introduces a new public sector duty which extends this coverage to age, sexual orientation, pregnancy and maternity, and religion or belief. The law requires that this duty to pay ‘due regard’ be demonstrated in the decision making process. It is also important to note that public authorities subject to the equality duties are also likely to be subject to the obligations under the Human Rights Act and it is therefore wise also to consider the potential impact that decisions could have on human rights as part of the same process.

### **Carmarthenshire's approach to Equality Impact**

In order to ensure that the council is considering the potential equality impact of its proposed policies and practices, and in order to evidence that we have done so, every proposal will be required to be supported by the attached Equality Impact Assessment. Where this assessment identifies a significant impact then more detail may be required.

### **Reporting on assessments**

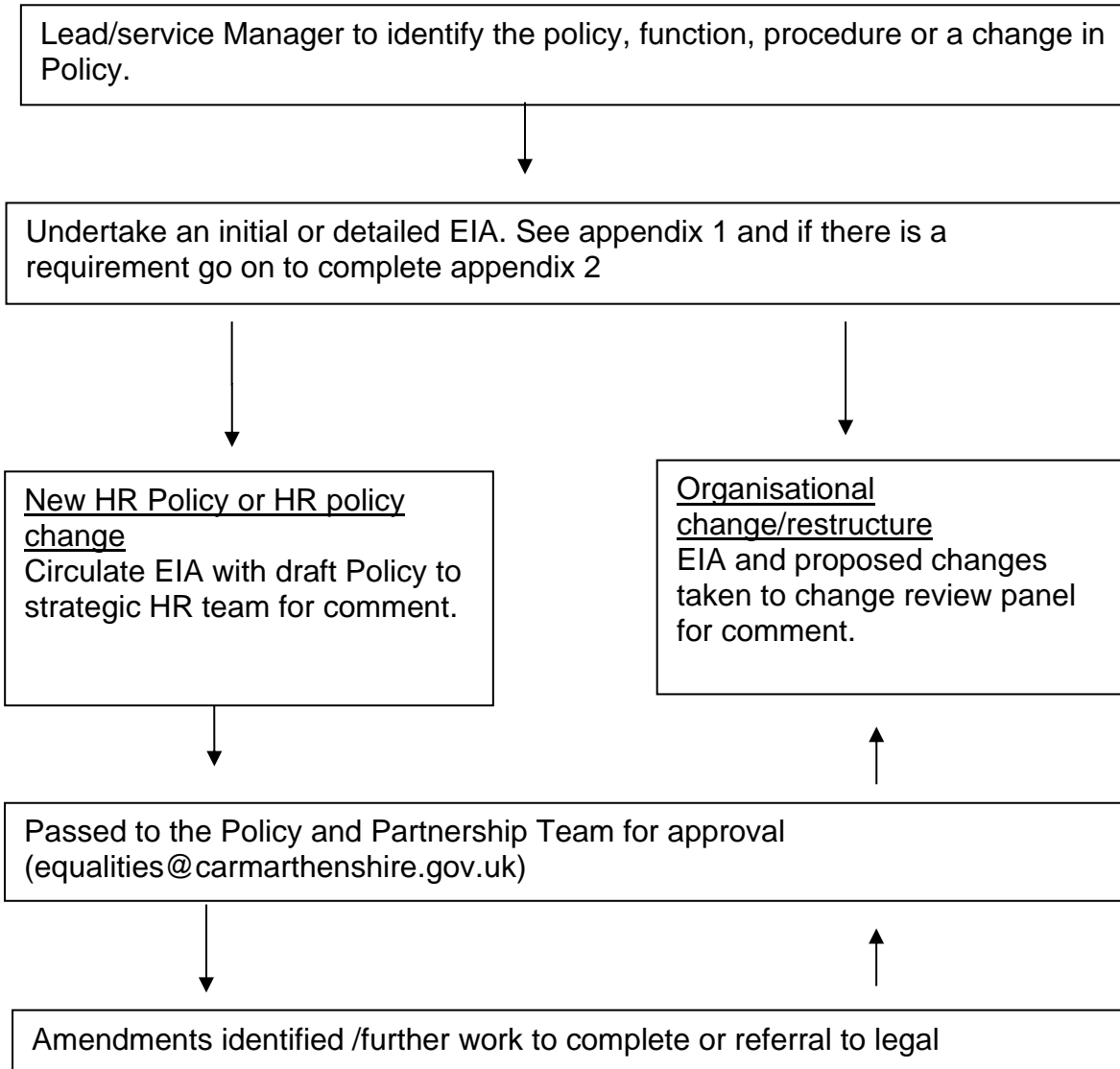
Where it is clear from the assessment that the likely impact on the authority's ability to meet the general duty is substantial, then it must publish a report.

### **Initial and Detailed Equality Impact Assessments**

The initial EIA (appendix 1) is a simple and quick method of assessing the effect of a policy, function, procedure, decision including financial cuts on one or more of the protected characteristics.

The Service Manager responsible for the relevant new or revised policies, functions, procedures and financial decisions must undertake, at least, an initial EIA and where relevant a detailed Equality Impact Assessment (appendix 2); EIA must be attached as background paper with reports to Executive and Scrutiny.

**Equality impact assessment – Process to follow where HR implications have been identified**



## Initial Equalities Impact Assessment Template

## Appendix 1

<b>Department:</b> Education & Children	<b>Completed by (lead):</b> Sara Griffiths	<b>Date of initial assessment:</b> October 2020 <b>Revision Dates:</b> July 2021
<b>Area to be assessed: (i.e. name of policy, function, procedure, practice or a financial decision)</b>	Proposal to reconfigure and remodel Behaviour Support Services at Ysgol Rhydygors to improve provision for children and young people.	
<b>Is this existing or new function/policy, procedure, practice or decision?</b>	School Re-organisation Proposal – Modernising Education Programme	
<b>What evidence has been used to inform the assessment and policy? (please list only)</b>		
<ul style="list-style-type: none"> <li>• 21<sup>st</sup> Century Schools Programme</li> <li>• Modernising Education Programme</li> <li>• School Organisation Code 2018</li> <li>• PLASC Data 2020</li> <li>• The Well-being of Future Generations (Wales) Act 2015</li> </ul>		

<b>1. Describe the aims, objectives or purpose of the proposed function/policy, practice, procedure or decision and who is intended to benefit.</b>	To discontinue Ysgol Rhydygors Special School. Separately, establish a Pupil Referral Unit (PRU) and Children’s Home/Respite Centre on the site of the former Ysgol Rhydygors school to cater for pupils with SEBD within Carmarthen. The proposal will support the improvement in the quality and standards of provision by enabling an alignment in the quality and standard of provision offered to pupils with SEBD across the Authority.		
<b>The Public Sector Equality Duty requires the Council to have “due regard” to the need to:-</b>	<b>2. What is the level of impact on each group/protected characteristics in terms of the three aims</b>	<b>3. Identify the risk or positive effect that could result for each of the group/protected characteristics?</b>	<b>4. If there is a disproportionately negative impact what</b>



(1) eliminate unlawful discrimination, harassment and victimisation; (2) advance equality of opportunity between different groups; and (3) foster good relations between different groups (see guidance notes)		of the duty? Please indicate high (H) medium (M), low (L), no effect (N) for each.	Risks	Positive effects	mitigating factors have you considered?
<b>Protected characteristics</b>	<b>Age</b>	N	Neutral		
	<b>Disability</b>	L	Neutral	This proposal will ensure consistency and equity in the type of provision offered to pupils with SEBD across the County.	
	<b>Gender reassignment</b>	N	Neutral		
	<b>Race</b>	N	Neutral		
	<b>Religion/Belief</b>	N	Neutral		
	<b>Pregnancy and maternity</b>	N	Neutral		
	<b>Sexual Orientation</b>	N	Neutral		
	<b>Sex</b>	N	Neutral		
	<b>Welsh language</b>	N	Neutral		
<b>Any other area</b>	N	Neutral			

5. Has there been any consultation/engagement with the appropriate protected characteristics?	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO
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		<p>Informal and formal consultation will be undertaken as stated in Welsh Government guidance. As part of the Formal Consultation period key stakeholders will be consulted with as detailed within this consultation document.</p>	
<p><b>6. What action(s) will you take to reduce any disproportionately negative impact, if any?</b> Ensure that all key stakeholders are fully informed at each stage of the consultation.</p>			
<p><b>7. Procurement</b>  <b>Following collation of evidence for this assessment, are there any procurement implications to the activity, proposal, service. N/A</b>  <b>Please take the findings of this assessment into your procurement plan. Contact the corporate procurement unit for further advice.</b></p>			
<p><b>8. Human resources</b>  <b>Following collation of evidence for this assessment, are there any Human resource implications to the activity, proposal or service?</b> Discussions regarding the proposal will be undertaken with HR.</p>			
<p><b>9. Based on the information in sections 2 and 6, should this function/policy/procedure/practice or a decision proceed to Detailed Impact Assessment?</b> (recommended if one or more H under section 2)</p>		<p>YES <input type="checkbox"/></p>	<p><input checked="" type="checkbox"/> NO</p>
<p><b>Approved by:</b> Head of Service</p>	<p>Simon Davies</p>		<p><b>Date:</b> October 2020</p>



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## EXECUTIVE BOARD

21 DECEMBER 2020

### REVISED CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN 2018 -2033 REPRESENTATIONS RECEIVED AND FOCUSED CHANGES

#### Recommendations / key decisions required:

- To endorse the officer recommendations on the consultation responses received to the Deposit Revised LDP, Sustainability Appraisal, Habitat Regulations Assessment and Supplementary Planning Guidance.
- To agree to the presentation of the schedule of Focused Changes to Executive Board for approval for a minimum 6-week public consultation.
- To approve the submission of the Deposit LDP and its supporting documents, evidence and background documents as required to the Welsh Ministers for Examination.
- To grant officers delegated authority to respond to recommendations and requests arising from the Inspector as part of the Examination and hearing sessions.
- To resolve to adopt the SPG in relation to Caeau Mynydd Mawr SAC and the Burry Inlet (subject to the outcome of the Examination) concurrent with the adoption of the Revised LDP.
- To grant officers delegated authority to make non-substantive typographical, cartographical and/or factual amendments to improve the clarity and accuracy of the Revised Local Development Plan and its supporting documents.

#### Reasons:

- To comply with the Council's statutory obligations in terms of the preparation and progression of a Revised Local Development Plan for Carmarthenshire, in accordance with statutory procedures.
- To respond and accord with the timetable for the preparation of the Revised LDP as set out within the approved Delivery Agreement.
- To ensure that the preparation and adoption of the Revised (replacement) LDP proceeds in a timely manner ahead of the expiration of the current LDP.

Relevant scrutiny committee to be consulted YES  
Community Scrutiny Committee: 17<sup>th</sup> December 2020

Exec. Board Decision Required YES 21<sup>st</sup> December 2020

Council Decision Required YES 13<sup>th</sup> January 2021

**EXECUTIVE BOARD MEMBER PORTFOLIO HOLDER:-** Cllr. Mair Stephens

Directorate:

Name of Head of Service:  
Llinos Quelch

Report Author: Ian Llewelyn

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# EXECUTIVE SUMMARY

**EXECUTIVE BOARD  
21 DECEMBER 2020**

## **REVISED CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN 2018 -2033 REPRESENTATIONS RECEIVED AND FOCUSED CHANGES**

### **1. BRIEF SUMMARY OF PURPOSE OF REPORT.**

This Report follows the resolution of County Council on the 10th January 2018 to formally commence the preparation of a Revised (replacement) Local Development Plan (LDP). Members will recall that the County Council at its meeting on the 13<sup>th</sup> November 2019 endorsed the Deposit Revised LDP 2018 - 2033 and its supporting documents (Habitat Regulations Assessment and Sustainability Appraisal) along with two draft Supplementary Planning Guidance (SPG) for the statutory 6-week public consultation. This commenced on the 29<sup>th</sup> January 2020 and following an extension of over 2 weeks closed on the 27<sup>th</sup> March 2020.

The above was supplemented by a subsequent 3-week consultation on the Deposit LDP and its supporting documents. This reflected the impact of the closure of public buildings on the final few weeks of the original consultation and closed on the 2<sup>nd</sup> October 2020.

The consultation on the Deposit Revised LDP represented an important milestone in the Council delivering on its statutory responsibilities to prepare an up-to-date Development Plan for the County (excluding the area within the Brecon Beacons National Park Authority).

Further to the above consultations, this report sets out the responses received together with the officer recommendations. It also seeks to set out a series of Focused Changes which are proposed in response to the recommendations along with those which may have emerged as a result of changes in legislation, guidance, evidence or in the interests of clarity and meaning. They also provide an opportunity to incorporate and respond to issues arising from Covid-19. References should be had to the Covid – 19 Assessment reported to County Council in association with the Revised Delivery Agreement on the 22<sup>nd</sup> October 2020.

### **2. Background**

The preparation of the Revised LDP reflects the Council's statutory responsibilities under the Planning and Compulsory Purchase Act 2004 - setting out policies and proposals for future development and use of land for Carmarthenshire over the period to 2033. The Revised Delivery Agreement, as approved by County Council on the 22 October 2020 for submission to the Welsh Government (WG) for approval, identifies the timeline for the preparation of the LDP, with Adoption of the Plan scheduled in July/August 2022.

Reference is also made to the publication of the Pre-Deposit Preferred Strategy in December 2018, which set out aspects such as: Issues; Vision, Strategic Objectives; Growth Options; Spatial Options and preferred strategic approach. The responses received as part of the consultation to the Pre-Deposit Preferred Strategy were reported to Council on the 15<sup>th</sup> May 2019 and have been considered, and where appropriate incorporated, in the preparation of the Deposit Plan. Due consideration has also been given to any recommendations outlined as part of the Sustainability Appraisal – Strategic Environmental Assessment process.

### **3. Deposit Revised LDP**

The Deposit Revised LDP is the Council's proposed statutory land use plan for its administrative area (excluding that area contained within the Brecon Beacons National Park) and covers the period 2018 – 2033. The preparation of the Plan is governed by defined statutory procedures with the process subject to a series of stages prior to its adoption. This process culminates in the Examination in Public (EIP) which will be presided over by an independent Planning Inspector appointed by the Welsh Ministers. Upon its adoption, the Revised LDP will supersede the current adopted LDP. It should be noted that the Inspector's recommendations are binding upon the Council.

Once adopted, the Revised LDP will guide and control development. It will inform future infrastructure and investment programmes from both internal and external partners. It will provide the local policy basis to determine future planning applications. Where relevant, Supplementary Planning Guidance (SPG) will be prepared to elaborate on, and consolidate upon, the policies and provisions of the Plan itself.

The Deposit Revised LDP consisted of a number of key elements which reflect stages in its preparation. It has sought to build on the preparation of, and consultation responses to, the Pre-Deposit Preferred Strategy. The recommendations of the Sustainability Appraisal – Strategic Environmental Assessment were also responded to where appropriate. In this respect, engagement has, in accordance with the provisions of the Delivery Agreement and its community involvement scheme, been an important aspect of the Plan's preparation, with the contribution of technical consultees and other focused groups being instrumental in guiding the Plan's content.

A key element of the Deposit was founded on the need for the Plan to make appropriate provision for a sustainable and deliverable level of growth - reflecting the ambitions of the County and meeting the needs of its communities. This has been supported by a robust and updated evidence whilst seeking to deliver on key strategic influences with an emphasis on job creation.

The LDP seeks to promote and develop the economy across Carmarthenshire. The Deposit Revised Plan identified appropriate land allocations to reflect Carmarthenshire as an ambitious County which attracts investment and provides opportunities for those living and working in our communities, as well as being a key player within a Swansea Bay regional context.

The proposed growth levels would also seek to challenge and address current demographic patterns, particularly the out-migration as evidenced in the 15-19 age group. It provides opportunities to balance the demographics of the County through the retention of, and in-migration of younger adults (including those returning) to the County, and address some of the issues which could be perceived from an aging population.

The Spatial approach to the distribution of land represents a Balanced Community and Sustainable Growth Strategy, a revision to the approach in the current LDP and one which seeks to address the issues highlighted in the Review Report, as well as reflecting the feedback in the formulation of the preferred strategy. The revised spatial hierarchy and the distribution of growth will therefore be expressed through the settlement framework as grouped under respective clusters which seek to characterise areas across the County.

The Deposit Revised LDP acknowledges and responds to changes in evidence and considers the emerging growth provisions of the emerging Future Wales: the National Plan 2040 (formerly the National Development Framework) as it progresses through to finalisation. Further revisions will be set out as part of the Focused Changes to ensure the Plan is reflective of the emerging Future Wales: the National Plan 2040. The Revised LDP will continue to develop as new evidence, policy guidance and legislation emerges.

#### **4. Responses to the Deposit Revised LDP**

As part of the consultation on the Deposit Revised LDP a significant number of responses were received from a range of bodies, organisations, companies, communities and interested parties, with comments covering nearly all aspects of the Plan's content.

In total 1,508 responses were received in respect of the Deposit Plan with 1,174 objecting to its content. Of the total number of representations circa 1,000 were in response to the inclusion or non-inclusion of a site within the Plan, whilst the remainder related to comments on the content of the written statement and matters of policy. Appendix 1 identifies some of the key issues arising from the consultation responses received,

**Appendix 2** sets out all the duly made representations received to the Deposit Revised LDP, providing a summary of the response. These are accompanied by officer recommendations including the proposed amendments to the Plan.

Where a site-based representation has been submitted the location and site area can be viewed via the link below:

<https://carmarthenshire.opus4.co.uk/planning/localplan/maps/carms-ldp-reps>

<https://carmarthenshire.opus4.co.uk/planning/localplan/maps/deposit-revised-ldp-representations-welsh>

The proposed amendments to the Plan are set out in the 'Focused Changes'. Further information on the Focused changes is set out in section 7 of this report. A full copy of the Schedule of Focused Changes is contained within Appendices of this report as follows:

- Focused Changes: Written Statement - Appendix 8
- Focused Changes: Proposals Map and Inset Maps – Appendix 9

It is also recognised that throughout the Plan making process, changes are required to reflect changes in legislation and guidance, as well evidential updates and the publication of new information. It is also essential to ensure the Plan responds to circumstances and contextual developments. In this respect, the consequences arising from Covid – 19 have and will require ongoing consideration.



Reference is made to the Covid – 19 Assessment prepared in conjunction with the Revised Delivery Agreement (as presented to County Council on the 22<sup>nd</sup> October 2020).

Note: Members should note that the responses contained within Appendix 2 will be subject to updating and validation.

## 5. Key Issues and Themes

Appendix 1 sets out a number of key themes arising out of the representations received. It also seeks to identify specific policy and evidential areas

## 6. Supporting Documents

### **Sustainability Appraisal – Strategic Environmental Assessment**

The Deposit Revised LDP was accompanied by a suite of evidential and other documents. Key amongst these is the Sustainability Appraisal (SA) which incorporates the Strategic Environmental Assessment (SEA). The SA is required by Section 62 (6a) of the Planning Compulsory Purchase Act 2004, while the SEA is a requirement of the SEA Directive 2001/42/EC. An SEA is a mandatory requirement for plans/programmes.

In response to the consultation on the content of the SA the responses were received are set out in Appendix 4.

### **Habitat Regulations Assessment**

A further key document is the Habitat Regulations Assessment Screening (HRA) Report. The HRA is a legal requirement under The Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'). The plan making authority must undertake HRA of their development plan to determine whether the policies and proposals in the plan are likely to have significant effects on the integrity of any European designated site.

In response to the consultation on the content of the HRA 33 responses were received. Received principally from Natural Resources Wales. The responses received are set out in Appendix 5.

Both the SA and HRA are prepared to supplement and critically evaluate the content of the Plan in an objective manner. As such they respond to the content of the Plan and make recommendations as and where appropriate. They will also continue to change and iterate as changes are made and proposed to the Plan as part of the Focused Changes (see section 7).

### **Supplementary Planning Guidance**

As part of the preparation and implementation of the Revised LDP, a series of Supplementary Planning Guidance (SPG) documents will be prepared and adopted.

SPG is produced to provide further detail on certain policies and proposals contained within the LDP. They help ensure certain policies and proposals are better understood and applied more effectively.

As part of the initial Deposit Revised LDP consultation, two SPG's were published for comment. These were the **Burry Inlet SPG** and the **Caeau Mynydd Mawr SAC SPG**. Their publication reflected the strategic importance of both policy areas in demonstrating the deliverability of the Plan and its adherence to legislative provisions.

As part of the consultation a number of representations were received on their content. These responses, along with the officer recommendations and any changes proposed in light of internal comments and/or contextual and evidential matters are set out in **Appendix 6 and 7**. These responses and any recommended changes have also been considered having regard to any implications on the content of the Revised LDP.

It should be noted that an SPG does not have the same status as adopted development plan policies. However, the Welsh Government advises that they may be taken into account as a material consideration in determining planning applications. Within the context of the Revised LDP, the SPGs seek to consolidate and elaborate upon the policies and provisions of the Plan itself as the plan making process proceeds. It is proposed to adopt the above SPG concurrent with the adoption of the Revised LDP.

## **7. Focused Changes**

The Focused Changes stage represents a non-statutory part of Plan preparation within the WG Development Plan Manual (Ed.3), to be used in exceptional circumstances. However, provision is made within the manual for their use in relation to significant changes in circumstances. In this respect, their inclusion as part of the timetable set out within the Revised DA reflects the need to respond to the circumstances and conditions arising in part from Covid – 19, and to ensure the Plan remains appropriate and sound.

The Focused Changes schedule sets out proposed amendments to the written statement, as well as the proposals map and inset maps. Whilst not of a strategic nature, they will ensure the Plan responds effectively to changing circumstances including representations, emerging evidence and legislation/policy.

The schedules of Focused Changes are set out in Appendix 8 and 9 as follows:

- Appendix 8 – Focused Changes: Written Statement
- Appendix 9 - Focused Changes: Proposals Map and Inset Maps

The Focused Changes, when published will also be accompanied by a schedule of minor editorial amendments which are published in the interests of clarity and to improve the usability of the Plan. They will however not form part of the Focused Changes and will not be consulted upon.

The Focused Changes will be labelled as an addendum to the Deposit Revised LDP.

The publication and consultation on the Focused Changes will be undertaken in a manner consistent with the deposit plan and the content of the Revised delivery Agreement. The consultation period will be for a minimum of 6 weeks and is scheduled to commence in February 2021.

The Focussed Changes will form part of the submitted documents (see below) with the consultation responses collated and summarised by the Council ahead of submission. It should be noted that, in accordance with WG guidance, the consultation responses received in relation to the Focused Changes will not be reported back to Council. Rather they will be matters for the Planning Inspector to consider as part of the Examination of the Plan.

## 8. Submission

The Revised LDP is scheduled to be submitted for independent examination in May 2021. At the point of the submission the Council will publicise the submission and publicise and make available the relevant documents and evidence. Details on the documents required to be submitted to the Welsh Government and the Planning Inspectorate is set out in Appendix 10.

It is anticipated that the Examination will formally commence in July 2021 with the Pre-hearing meeting, followed by a series of hearing sessions. Reference should be had to the note on procedural requirements (Appendix 10) and notably the reference to the report of the Planning Inspector being binding.

<b>DETAILED REPORT ATTACHED?</b>	<b>YES</b>
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# IMPLICATIONS

**I confirm that other than those implications which have been agreed with the appropriate Directors / Heads of Service and are referred to in detail below, there are no other implications associated with this report:**

**Signed: L Quelch**

**Head of Planning**

Policy, Crime & Disorder and Equalities	Legal	Finance	ICT	Risk Management Issues	Staffing Implications	Physical Assets
<b>YES</b>	<b>YES</b>	<b>YES</b>	<b>YES</b>	<b>NONE</b>	<b>YES</b>	<b>YES</b>

## **1. Policy, Crime & Disorder and Equalities**

The Revised LDP identifies and develops on the links and requirements necessary to ensure the Plan, and the processes in its preparation are compatible with Carmarthenshire County Council’s well-being objectives. It also ensures alignment with the national Well-being Goals set out within the Well-being of Future Generations Act 2015. Through its land use planning policies, the Revised LDP will seek to promote the principles of sustainability and sustainable development by facilitating the creation of communities and local economies which are more sustainable, cohesive and provide access to local services and facilities and reducing the need to travel.

The integration of sustainability as part of the preparation of the Plan is reflected in the undertaking of a Sustainability Appraisal and Strategic Environmental Assessment reflecting national and international legislative requirements. The formulation of the Revised LDP will closely consider matters of sustainability and will be prepared with the outcomes of the Plan measured in light of the Sustainability Appraisal indicators. This iterative approach ensures sustainability is at the heart of the Plan and that it is reflective of the requirements emanating from the Wellbeing and Future Generations Act 2015 and the Carmarthenshire Well-being Plan: The Carmarthenshire We Want – 2018 - 2023.

The LDP has full regard to the national legislative provisions and will relate and have regard to the Carmarthenshire Well-being Plan. The Revised LDP is assessed against the National and local Well-being Objectives. The Revised LDP will ensure the requirements emanating from the Act are fully and appropriately considered with the Plan, reflective of its duties. In this respect the Plan has been prepared in accordance with the Five Ways of Working through the formulation of its content and its iteration as part of the SA process:

- Long term – The plan sets a framework for land use planning through to 2033 balancing short term needs with those of the long term.
- Prevention – balancing impacts and the implications of the Plans content.
- Integration – connects plans, strategies and balancing and measuring the impacts through effective integration.
- Collaboration – developed through collaboration across the Plan making process with a range of partners.
- Involvement – reflecting the Plan making’s process focus on engagement and involvement, as set out in the Revised Delivery Agreement - Community Involvement Scheme.

The preparation of the Deposit LDP is in accordance with the 2004 Planning and Compulsory Purchase Act. It is also in line with national regulations and guidance in relation to its scope and content.

**Reference is made to the emerging Future Wales: the National Plan 2040 (formerly the National Development Framework) which sets out a high-level spatial strategy for Wales. The Revised LDP will be required to comply with its provisions.**

## **2. Legal**

The preparation of the Revised LDP reflects the provisions of the Planning and Compulsory Purchase Act 2004, the requirements of the Planning (Wales) Act 2015 and secondary legislation in the form of the Local Development Plan (Regulations) Wales (As amended) 2015.

Its preparation also has appropriate regard to other sources of primary and secondary legislation including the Environment (Wales) Act and the Well-being of Future Generations Act 2015.

## **3. Finance**

Financial costs to date are covered through the financial provisions in place - including growth items and reserves as required. Should the Planning Division Budget not be able to provide further funding necessary to meet the statutory requirements to review and prepare a development plan then an application will be made for a further growth bid for future years. Whilst additional evidence base checks are required in response to Covid-19 at this stage they are likely to be accommodated within current financial provisions.

The Revised Delivery Agreement, in making reference to such matters, outlines the Council's commitment to prepare and adopt an up to date LDP in accordance with the Council's statutory duty.

## **4. ICT**

Requirements in relation to ICT will seek to utilise existing resources.

## **6. Physical Assets**

Reference is made to the potential inclusion or otherwise of Council owned sites and properties. The preparation of the Revised LDP will impact on Council land and property holdings and values through their inclusion or otherwise for potential development purposes. This will have implications on potential disposal and land valuations and consequently capital receipts.

## **7. Staffing Implications**

Provision has been made for the recruitment of a Programme Officer for the Examination into the LDP. This appointment is a mandatory requirement as part of the examination process.

# CONSULTATIONS

I confirm that the appropriate consultations have taken in place and the outcomes are as detailed below

Signed: L Quelch

Head of Planning

## 1. Scrutiny Committee

Community Scrutiny was consulted as part of the preparation of the Deposit Revised LDP. Date for reporting of this report to be confirmed.

## 2. Local Member(s)

The content of the Deposit LDP, its supporting documents and the proposed SPG have been subject to full public consultation. Members will be engaged throughout the remainder of the Plan making process.

## 3. Community / Town Council

The content of the Deposit LDP, its supporting documents and the proposed SPG have been subject to full public consultation. Town/Community Councils(s) are a specific consultee at statutory stages throughout the Plan making process.

## 4. Relevant Partners

The content of the Deposit LDP, its supporting documents and the proposed SPG have been subject to full public consultation. Contributions have and will continue to be sought throughout the revision process. A range of partners are identified as specific and general consultees throughout the Plan making process.

## 5. Staff Side Representatives and other Organisations

The content of the Deposit LDP, its supporting documents and the proposed SPG have been subject to full public consultation. Internal contributions have and will continue to be sought throughout the Plan making process.

**EXECUTIVE BOARD PORTFOLIO  
HOLDER AWARE/CONSULTED**

Yes

Executive Board member is chair of the LDP Advisory Panel

**Section 100D Local Government Act, 1972 – Access to Information  
List of Background Papers used in the preparation of this report:**

Title of Document	Locations that the papers are available for public inspection
LDP Review Report	<a href="http://www.carmarthenshire.gov.wales/media/1213042/ldp-review-report-english-version.pdf">http://www.carmarthenshire.gov.wales/media/1213042/ldp-review-report-english-version.pdf</a>
Evidence Base	<a href="https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base/#.XcFfSEb7SUK">https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base/#.XcFfSEb7SUK</a>
Pre-Deposit Preferred Strategy	<a href="https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/preferred-strategy-pre-deposit-public-consultation/#.XW2JhuhKjIU">https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/preferred-strategy-pre-deposit-public-consultation/#.XW2JhuhKjIU</a>
Sustainability Appraisal and Habitats Regulations Assessment	<a href="https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/sustainability-appraisal-and-habitats-regulations-assessment/#.XW2J7uhKjIU">https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/sustainability-appraisal-and-habitats-regulations-assessment/#.XW2J7uhKjIU</a>
Deposit Revised LDP (Main page)	<a href="https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/deposit-plan/#.Xww40kVKiUk">https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/deposit-plan/#.Xww40kVKiUk</a>
Deposit Revised LDP – Written Statement	<a href="https://www.carmarthenshire.gov.wales/media/1223344/deposit-written-statement.pdf">https://www.carmarthenshire.gov.wales/media/1223344/deposit-written-statement.pdf</a>
Deposit Revised LDP – Proposals Map	<a href="#">ProposalsMap</a>
Deposit Revised LDP – Constraints Map	<a href="#">Constraints Map</a>
Revised Delivery Agreement	<a href="https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/delivery-agreement/#.X9IAAZ77SUK">https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/delivery-agreement/#.X9IAAZ77SUK</a>

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## **Appendix 1 – Key issues and Themes**

### **Housing supply and the housing growth requirement**

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

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

The level of growth set out within the Revised LDP seeks to balance the needs of both rural and urban communities, reflecting an ambitious yet realistic annual build rate, looks to deliver the Council's Corporate Strategy, regeneration and job creation objectives.

Further work will be undertaken in relation to the housing growth requirement and housing supply, with further population and household demographic evidence informing and supporting the Council's approach at the examination.

### **Housing Distribution**

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

The Council will in responding to the representations received undertake further work relating to Tier 4 of the settlement hierarchy and evidence the significant role these villages play in supporting the social, economic and linguistic fabric of their communities.

In addition, the housing trajectory and the associated evidence base will continue to highlight the location and rate of housing delivery within the county.

### **Retail**

As part of the response to Covid-19 and in recognition of the changing shape of our Town centres and the Retail sector, the Focused Changes will seek to reflect the challenges ahead. In this respect consideration will be given to the future role of town centres and the nature of suitable activities in promoting vibrant and attractive living environments.

### **Affordable Housing**

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

Further evidential work will be undertaken on planning contributions. In addition, the use of the Regional Development Viability Model will ascertain the level of affordable housing

contributions from large scale housing development, and safeguarded through the use of Statements of Common Ground with developers and landowners

### **Gypsy and Travellers**

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

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

### **Site Specific Representations**

A number of representations have been received relating to the allocation of housing sites within the Plan. Whilst a few of the representations are in support of the sites included in the Plan, the majority are objections to their inclusion within the Plan, in particular to the non-delivery of current allocated sites.

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

In relation to the candidate sites or requests to amend the development limits, circa 1,000 responses were received with the majority of them being submitted previously under the candidate site process in 2018. Their assessment would have already been undertaken and published in the January 2020 Site Assessment Table. New candidate sites will be considered within the process set out in the Site Assessment Methodology (September 2019).

### **Welsh language**

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

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

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

### **Caeau Mynydd Mawr and the Burry Inlet**

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

The policies are Policy NE4 'Development within the Caeau Mynydd Mawr SPG Area' and Policy INF4 'Llanelli Wastewater Treatment Surface Water Disposal' respectively.

The Council will be aware that consultation has already been undertaken in regards Draft Supplementary Planning Guidance (SPG) prepared to support the implementation of the above policies. In this regard, the Council will be provided with responses received to the SPG consultation and recommendations in relation thereto. Again, there are no fundamental concerns raised.

### **Renewable Energy**

Response for the Welsh Government in relation to Renewable Energy policies within the Revised LDP and the implications arising from the emerging Future Wales: the National Plan 2040 (formerly the National Development Framework) has required further evidencing to be undertaken. Amendments to the policies of the Revised Plan will be reflective of the changing positions within national policy.

### **Climate Change**

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

### **The Environment**

In regards environmental matters, it is not considered that there are any fundamental issues. The Council has undertaken engagement with key consultees – notably Natural Resources Wales and Dwr Cymru Welsh Water. There are no fundamental concerns raised by these key consultees in regards the strategic direction of the Plan, however site-specific matters will be responded to as and where appropriate within the Schedule of Focused Changes.

It should however be noted that there is likely to be a requirement to respond to comments made in regards intensive agriculture.

### **Flood Risk**

The Council has prepared evidence with regards this matter, with a Stage 1 SFCA and a Stage 1b SFCA undertaken and published. The Council will continue to seek to respond proactively to comments received at deposit Plan stage by way of focused changes – (notably comments received to policy CCH4 and paragraph 11.469 of the deposit Plan). However, and with reference again to proactive consultation undertaken (including with Natural Resources Wales), there are no fundamental concerns with regards to the Plan in this regard.

## **Infrastructure**

There are no fundamental issues in respect of infrastructure and the Revised LDP. Of the representations received no raise serious issues of concern. However, there are some minor concerns with some areas from a highway's perspective. The council will look to acquire further evidence in regard to Cross Hands and the highways infrastructure needed to facilitate any new development in the area as the Plan progresses towards adoption. Particular reference will be had to any requirement to upgrade the 'diamond' on the East side of Cross Hands along with the Cross Hands Economic Link Road (ELR). This will alleviate any pressure caused by new developments at the new Cross Hands East Employment site. Welsh Government have no objections to make, only noting potential cumulative impacts in Cross Hands from a highways point of view.

## **Employment**

Evidencing the deliverability of employment allocations is a key issue that the Welsh Government are continuing to emphasise, in accordance with PPW10. This has seen a streamlining of our employment allocations for the Revised LDP – a reduction from 113ha in the adopted LDP to just under 78ha in the Revised Plan.

However, whilst the overall employment portfolio has reduced in terms of specific allocations, new policy provisions have been introduced that seek to enable new employment opportunities in both our larger growth areas (e.g. reserve sites policy), as well as in the more rural areas where greater diversification will be possible.

Two further areas of importance emphasised by the Welsh Government in their representations concern the linking of housing growth with employment opportunities, and the need to engage with neighbouring authorities in the production of 'larger than local' employment studies. For both these topics we commissioned a joint study with Pembrokeshire County Council (and the two constituent National Park authorities with our borders). The resultant piece of work was completed at the end of 2019, and the consultants are currently providing follow up work, where they are looking at the effects of Brexit and Covid on the economy at the two county level and providing advice and positive ways forward.

Due regard is also given to the evidence base of the Plan, where annual monitoring reports (AMRs) and annual employment land reviews (ELRs) are maintained to ensure that the evidence is kept up to date.

## **Minerals**

There were around 40 representations relating to minerals, most of these related to minor matters such as small-scale changes to policy wording.

There was however one objection from the Welsh Government relating to what they saw as the lack of evidence provided in the plan to ensure that there was a sufficient supply of sand and gravel reserves in the County (and Ceredigion and Pembrokeshire – as sand & gravel reserves is a cross border issue) to last until the end of the Plan period in 2033.

In response to this objection, Carmarthenshire CC has already commenced discussions with the two other authorities, with a view to progressing with the matter and drawing up a Statement of Sub Regional Collaboration (SSRC), as required in the Regional Technical Statement (RTS) for the South Wales Region (and as highlighted by the Welsh Government in their representation).

Due regard is also given to the evidence base of the Plan, where annual monitoring reports (AMRs) are maintained to ensure that the evidence is kept up to date. Furthermore, the Minerals Topic Paper (published at the end of 2019) will be revised and updated prior to submission of the Plan to the Welsh Government in May 2021.

## **Waste**

There were very few representations on this topic area, with no objections from the Welsh Government.

One notable representation (submitted by consultants working for CWM Environmental Ltd) related to the allocation of Nantycaws as a waste management site (as it is in the current LDP). The Revised Deposit Plan had identified Nantycaws as a reserve site (under the reserve sites policy). In light of the strategic location of the site, consideration will be given to the allocation of Nantycaws as a regeneration and mixed-use site (under Policy SG1) as part of the focused changes (subject to County Council endorsement).

Due regard is also given to the evidence base of the Plan, where annual monitoring reports (AMRs) are maintained to ensure that the evidence is kept up to date. Furthermore, the Waste Topic Paper (published at the end of 2019) will be revised and updated prior to submission of the Plan to the Welsh Government in May 2021.

It should also be noted that Carmarthenshire is the Lead authority in the production of the annual 'Waste Planning Monitoring Report (WPMR) for the South West Wales region' – a key piece of evidence to be utilised by all six authorities in the sub region. The latest WPMR was submitted to the Welsh Government at the end of March 2020.

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# Deposit LDP

## Summary of Representations & Council's Initial Response

1. Introduction

1. Introduction

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### 1. Introduction

#### Paragraph 1. Introduction

##### Representation(s)

**3554 Mineral Products Association Wales (Mr Nick Horsley) [3778] Object**

##### *Summary:*

Objection to the landscape format of the Deposit LDP Written Statement:

We do not feel that the landscape orientation of the document and the splitting of each page into two columns has been conducive to deliver an "easy read". Some policies have ended up on two pages in three columns. We would suggest that the document is reformatted into a portrait orientation without the columns.

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##### *Council's Initial Response*

**Noted**

##### *Action*

**No change to the Plan.**

=====

**2. What is the Deposit Plan?**

**Paragraph Para 2.8**

*Representation(s)*

**3072 Mr Robert Griffiths [4795]**

**Object**

*Summary:*

European Court of justice states cso spill illegal so building more houses may cause situation to worsen wadenzee judgement States precautionary approach must apply

*Council's Initial Response*

**Comments noted.**

**With regards the Plan, it should be noted that a Habitats Regulations Assessment (HRA) has been undertaken and the Council recognises that the HRA should continue to play an important role in ensuring the required regulatory compliance. The HRA itself was also subject to consultation.**

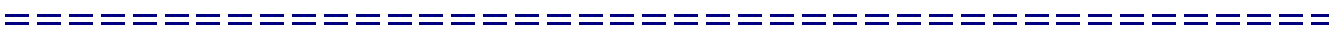
**Full regard is given to input from Dwr Cymru Welsh Water, Natural Resources Wales and the City and County of Swansea as part of the preparation of the Plan. In regards the infraction proceedings, reference is made to the investment made by Dwr Cymru Welsh Water in the area and subsequent reporting requirements.**

**It is noted that the Plan will seek to contribute towards a reduction in the frequency of spills by undertaking compensatory surface water removal as part of planning approvals for relevant schemes - see policy INF4 and supporting SPG.**

**Reference is also made to the Council's response to representation 3882 under policy INF4 and the fact that no fundamental concerns have been expressed by any of Natural Resources Wales, City and County of Swansea or Dwr Cymru Welsh Water to the emerging Revised Carmarthenshire Local Development Plan.**

*Action*

**No Change to the Plan.**





**Paragraph Habitat Regulations Assessment**

*Representation(s)*

**3071 Mr Robert Griffiths [4795]**

**Object**

*Summary:*

The European courts have passed judgment on the area because of the cso spills rainscape remains unproven so the wadenzee judgment must be applied  
Passing anymore plans to build wii contravene the judgment and be an illegal act

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*Council's Initial Response*

**Comments noted.**

**With regards the Plan, it should be noted that a Habitats Regulations Assessment (HRA) has been undertaken and the Council recognises that the HRA should continue to play an important role in ensuring the required regulatory compliance. The HRA itself was subject to consultation.**

**Full regard is given to input from Dwr Cymru Welsh Water, Natural Resources Wales and the City and County of Swansea as part of the preparation of the Plan. In regards the infraction proceedings, reference is made to the investment made by Dwr Cymru Welsh Water in the area and subsequent reporting requirements.**

**It is noted that the Plan will seek to contribute towards a reduction in the frequency of spills by undertaking compensatory surface water removal as part of planning approvals for relevant schemes - see policy INF4 and supporting SPG.**

**Reference is also made to the Council's response to representation 3882 under policy INF4 and the fact that no fundamental concerns have been expressed by any of Natural Resources Wales, City and County of Swansea or Dwr Cymru Welsh Water to the emerging Revised Carmarthenshire Local Development Plan.**

*Action*

**No Change to the Plan.**

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### 3. Influences on the Plan

#### Paragraph 3. Influences on the Plan

##### Representation(s)

**3140 Barton Willmore (Joe Ayoubkhani) [646] Support**

##### Summary:

Chapter 3 - Support

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##### Council's Initial Response

**Support welcomed.**

##### Action

**No change to the Plan.**

=====

#### Paragraph Overview, Para 3.2

##### Representation(s)

**4605 Rhanbarth Sir Gâr Cymdeithas yr Iaith (Rhanbarth Sir Gâr) [2370] Object**

##### Summary:

Nid oes unrhyw sôn o gwbl am y Gymraeg yn y Profion Cadernid

There is also no mention whatsoever of the Welsh language in the Tests of Soundness.

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##### Council's Initial Response

**Nodir y sylwadau.**

**Cyfeirir at y Llawlyfr Cynlluniau Datblygu Lleol (Argraffiad 3) - yn nodedig Tabl 27 ynddo (paragraff 6.27).**

**Comments noted.**

**Reference is made to the Local Development Plans Manual (Edition 3) - notably Table 27 contained therein (paragraph 6.27).**

##### Action

**Dim newid i'r Cynllun.**

**No change to the Plan.**

=====

**Representation(s)**

**4274 - RSAI - [4993]**

**Object**

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

**Summary:**

The deposit consultation commenced without the detailed site assessment proformas (2A/2B) being available to review. We set out our concerns to the Council as we wanted to understand how the Council had identified the most appropriate sites to be included in the LDP. This document then appeared at a later date but it only included the allocated sites. We would expect to see a full assessment of all the sites so that it would be possible to understand why one site has been allocated ahead of another. On querying with the Council they noted that a full assessment (2A and 2B) had only been carried out for the allocated sites. This raises a procedural issue in that the Council appears to have identified the sites to be allocated without reviewing all the options and giving each site fair consideration. On further request and weeks into the consultation process we were provided with the 2A/2B proforma for site SR/086/075. However, we question whether the same proforma assessment has been carried out for the other sites that have not been allocated. All sites, regardless of the number submitted should be assessed in the same manner to provide fairness and transparency to the process.

---

*Council's Initial Response*

**Disagree, the Plan has been prepared in accordance with regulations and guidance. In relation to the Deposit Plan it has also been subject to further consultations significantly over and above the regulatory requirements.**

**Whilst noting the comments in relation to the availability of a document, the Council recognises that there was a delay in the publication during the initial few days of the consultation, however its subsequent prompt publication along with the extension of the first Deposit consultation period by a further 2 weeks ensured it was available in a manner through which interested parties were able access the information available and have additional opportunity to submit comments or representations. Reference should also be had to the second 3-week Deposit consultation and the additional scope and opportunities it provided to submit comments. This together with the 2-week extension to first Deposit consultation went significantly beyond the statutory provisions identified within the regulations and ensured the documentation was available for scrutiny.**

**Further to the respondents comments in respect of the availability of site proformas and the non-publication of proformas for non-allocated sites, reference is made to the Site Assessment Methodology and notably paragraph 2.13 which states: "Proformas will be provided on allocated site as part of the evidence base for the Deposit LDP consultation in December 2019, whilst the detailed assessment on non-allocated sites will be available on request." An overview assessment of all the sites considered as part of the preparation of the Revised LDP are available on the website and includes the non-allocated sites. This is supplemented by the opportunity to request proformas non allocated candidate sites as appropriate. This approach reflected the practicalities of publishing the full set of over 900 additional non allocated site proformas on the Council's webpages. All duly submitted sites have been fully considered in accordance with the provisions of the site assessment methodology. It is noted that the respondent acknowledges that the proforma was made available as part of their request.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3393 Elaine Morrisroe [4964] Object**

*Summary:*

My comment concerns the process of formulating the Local Development Plan itself which I do not believe is sound. I believe that at the level at which it is drawn up and agreed, not enough detail is known about each particular site to come to a truly Informed decision.

*Council's Initial Response*

**Disagree. Sites are considered in accordance with the site assessment methodology and supported as appropriate by further information. In this respect the Plan has been prepared in accordance with legislation, national planning policy and guidance.**

*Action*

**No change to the Plan.**

**Paragraph Overview, Para 3.4**

*Representation(s)*

**3577 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

There are some text, policies and proposed development sites that we consider need refining to enable a robust sound plan.

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*Council's Initial Response*

**Comments noted. The representations submitted by the respondent have been responded to with changes made as appropriate.**

*Action*

**No change to the Plan.**

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*Representation(s)*

**3575 Natural Resources Wales (Miss Sharon Luke) [3253] Support**

*Summary:*

We acknowledge that you have taken on board advice from our previous correspondence which has enabled positive provisions in the Deposit Plan both in policy terms and with regard to allocation of sites. We note that the allocations include sites which we were not consulted on pre-deposit

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*Council's Initial Response*

**Support welcomed.**

*Action*

**No Change to the Plan.**

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*Representation(s)*

**3811 Natural Resources Wales (Miss Sharon Luke) [3253] Support**

*Summary:*

NRW have provided a large amount of detail in the annexes supporting their main representations on a range of developmental considerations which are not specific objections. This also includes a review of the SFCA and Stage 1b SFCA. However, these will be taken forward into the Infrastructure Assessment for review. It should be noted that within these annexes NRW do caveat their responses and do not rule out the possibility that certain sites could be deemed inappropriate for development in the future.

---

*Council's Initial Response*

**Comments noted.**

**The Infrastructure Assessment will be prepared / updated by the Council.**

**In regards the comments on the SFCA (regional work with Pembrokeshire County Council) and Stage 1b SFCA (Carmarthenshire County Council only), clarification has been attained by the Council (and Pembrokeshire County Council).**

**NRW confirmed that the clarifications provided are sufficient to address the concerns raised in the Deposit stage representations on both Plans.**

**Of note is the NRW comment on the need for the effect on flooding elsewhere to be assessed, whatever the source of flood risk, in relation to Section 3.4.2 of the Stage 1b SFCA. This states "The third-party FCA suggests that due to the source of the flood risk being tidal, flood compensation 'is not strictly considered as a requirement'." The NRW comment was provided to clarify that they would not agree with this statement but NRW have confirmed however that the need to consider the effect on flooding elsewhere is acknowledged in another part of the SFCA (i.e. the stage 1b SFCA).**

*Action*

**No change to the Plan.**

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**Paragraph Overview, Para 3.5**

*Representation(s)*

**4581 Ceredigion County Council (Anjuli Davies) [5303] Support**

*Summary:*

A general comment is provided that Ceredigion County Council would welcome to opportunity to discuss the plan's proposals and their implications for Ceredigion.

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*Council's Initial Response*

**Noted. The Council is committed to ongoing cross border working and would welcome the opportunity for further cross border discussions and regional working.**

*Action*

**No change to the Plan.**

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**Paragraph Overview, Para 3.15**

*Representation(s)*

**4450 Mrs Elizabeth Hope Ferguson [5247] Object**

*Summary:*

Adaptability - one of the very recent major contextual changes is the result of Covid-19. Previous perceptions and normal ways of doing things have and are changing at a rapid rate. There is a need for greater flexibility in areas that have traditionally been set. For example the merging of housing and work places has become a new norm and robust high speed internet a priority. Implications from trends of the past 6 months need to be analysed and incorporated into the rLDP so that it can truly take us from one place to another in the next 13 years.

---

*Council's Initial Response*

**Noted.**

**The impacts and implications on the content of the Plan from Covid-19 are duly noted and reference is drawn to the Covid-19 Assessment published as part of the Revised LDP documents. In this respect the Plans policies and components of its evidence base will where appropriate be subject to further consideration.**

**With reference to the examples stated by the respondent reference should be had to Policy INF3: Broadband and Telecommunications and Policy EME5: Homeworking which reflect the importance of those highlighted.**

*Action*

**No change to the Plan as a direct result of this representation.**



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## 4. Carmarthenshire - Strategic Context

### Paragraph 4. Carmarthenshire - Strategic Context

#### Representation(s)

3342 Prof David Jenkins [4880]

Object

#### Summary:

This Plan fails adequately to respond to the climate emergency. It lacks recognition of a paradigm shift from Sustainable development to resilience building. What is clearly missing from the Plan is a thorough consideration of resilience.

In order to ensure that the plan emerges fit for purpose it needs to be exposed to greater democratic engagement. This will occur in the context of a Citizens Assembly but not otherwise.

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#### Council's Initial Response

The Plan has been prepared with regard to considerations around climate change and the declarations of climate emergency both at a national and local level. It is however recognised that the Revised LDP needs to remain responsive throughout its preparatory process. Consequently, its content will continue to iterate to reflect contextual changes and evidence.

In relation to the respondent comment in respect of democratic engagement. The Plan has been prepared in accordance with the content of the agreed Delivery Agreement including its community Involvement Scheme and consistent with statutory provisions.

#### Action

No change to the Plan.

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### Paragraph Para 4.5

#### Representation(s)

4582 Ceredigion County Council (Anjuli Davies) [5303]

Object

#### Summary:

It would be helpful if the paragraph also references the health services provided from WWGH, the higher and further education role of the University of Wales Trinity St David's campus and the employment opportunities for the wider region which extends into Ceredigion.

---

#### Council's Initial Response

Noted. Paragraph 4.5 of the Deposit Revised LDP refers to the identification of the three main urban centres within Carmarthenshire. The suggestion within the representation would not be within the context of this paragraph.

#### Action

No change to the Plan.

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**Paragraph Para 4.20**

*Representation(s)*

**3150 Professor John Finney [4854]**

**Object**

*Summary:*

The planning needs of Carmarthenshire are not necessarily consistent with those of the rest of the Mid and West Wales region set out in the draft NDF. This three-region subdivision has been commented on negatively by the Climate Change, Environment and Rural Affairs Committee, which recommends a four-region division. The needs of Carmarthenshire are more complex in that the more rural northern part of the county has needs more in common with Ceredigion than the western corridor through Carmarthen. So there would seem to be potential problems in aligning the LDP with the three-region model in the draft NDF.

*Council's Initial Response*

**Noted. The NDF is being prepared by the Welsh Government and subject to its own preparatory procedures and consultation processes. Consequently, its content and the subdivision of regions across Wales are matters beyond the remit of the Revised LDP.**

It should be noted that Test 1 of the Tests of Soundness requires that the LDP be in general conformity with the NDF (when published). The Plan has therefore been prepared within this context and will where appropriate be amended to reflect its content.

It is noted that at the time of writing the NDF has been retitled as the Future Wales and is undergoing consideration through the Senedd ahead of anticipated publication in February 2021. Note: the latest iteration of the emerging draft has revised the three regions originally proposed to four.

*Action*

**No change to the Plan.**

**Paragraph Para 4.22**

*Representation(s)*

**3579 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Support**

*Summary:*

We note the commitment to consider the content of the emerging National Development Framework (NDF) as the plan continues to progress towards adoption.

*Council's Initial Response*

**Comments noted.**

*Action*

**No change to the Plan.**

**Paragraph Para 4.44**

*Representation(s)*

**3151 Professor John Finney [4854]**

**Support**

*Summary:*

The county's natural environment is indeed crucial to the inhabitants' physical and spiritual wellbeing, as well as being critical in attracting tourism. As is well-recognised, retaining these these qualities when there is significant development pressure is a difficult balance to maintain. My readings of later paragraphs suggest to me that the planning processes proposed may not be sufficiently robust to fulfil the definition of sustainability used and will lead to loss of valuable natural environment and biodiversity..

*Council's Initial Response*

**Noted.**

**The Revised LDP has been prepared in accordance with, and within the context of legislation and National Planning Policy, in this respect it has policies and provisions including those in relation to sustainability and the natural environment are considered sound.**

**Reference should be had to the Plan's supporting documents notably the Sustainability Appraisal (incorporating the Strategic Environmental Assessment) and the Habitat Regulations Assessment.**

*Action*

**No change to the Plan.**



### 5. Issues Identification

#### Paragraph Para 5.6, A Resilient Carmarthenshire

*Representation(s)*

**3153 Professor John Finney [4854]**

**Support**

*Summary:*

These are all laudable objectives. However, biodiversity is not just relevant to designated sites so I hope the plan will recognise biodiversity wherever it is found, and not allow developments to go ahead in environmentally high quality areas that do not have an official

*Council's Initial Response*

**Support welcomed. It is considered that there is sufficient provision in the Plan's detailed policies to allow for consideration of the concerns highlighted.**

*Action*

**No change to the Plan.**

#### Paragraph Para 5.6, A Healthier Carmarthenshire

*Representation(s)*

**3154 Professor John Finney [4854]**

**Support**

*Summary:*

These are all laudable objectives. However, with respect to objective 12, my readings of later paragraphs suggest to me that the planning processes proposed may not be sufficiently robust to protect beauty, peace and quiet with respect to some kinds of development (e.g. of wind energy).

*Council's Initial Response*

**Support welcomed. It is considered that there is sufficient consideration of the concerns highlighted within the more detailed policies of the Plan.**

*Action*

**No change to the Plan.**

**Paragraph Para 5.6, A Carmarthenshire of Cohesive Communities**

*Representation(s)*

**3263 Barratt David Wilson Homes (Mrs Francesca Evans) [4879] Support**

*Summary:*

BDW Homes welcomes the recognition of the impact of the lack of delivery of new housing upon the creation of Cohesive Communities. The delivery of new homes and the maintenance of a five year supply of housing is essential to ensure that Cohesive Communities are created in line with the WBFGA. It is therefore crucial that proposed site allocations are deliverable.

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**3465 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830] Support**

*Summary:*

We note and welcome the inclusion of issue 23 (under paragraph 5.6) regarding infrastructure capacity to support development. The availability of our infrastructure capacity is a key element - particularly in rural areas - in ensuring sustainable and viable development sites.

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*Council's Initial Response*

**Support welcomed**

*Action*

**No change to the Plan.**

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## 6. A Vision for 'One Carmarthenshire'

### Paragraph 6. A Vision for 'One Carmarthenshire'

#### Representation(s)

**3141 Barton Willmore (Joe Ayoubkhani) [646] Support**

**Summary:**

A Vision for 'one Carms' - Support

**3623 Union Tavern Estate [3913] Support**

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

**Summary:**

We support the LDP's vision which seeks to ensure that the Deposit LDP 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.

**3633 - - John Roberts Family Trust [5018] Support**

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

**Summary:**

We support the LDP's vision which seeks to ensure that the Deposit LDP 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.

#### Council's Initial Response

**Support welcomed**

#### Action

**No change to the Plan.**

### Paragraph Para 6.4

#### Representation(s)

**3264 Barratt David Wilson Homes (Mrs Francesca Evans) [4879] Support**

**Summary:**

BDW Homes is supportive of the proposed Vision for 'One Carmarthenshire' as it seeks to achieve an appropriate balance between environmental, economic, social and cultural objectives. The proposed Vision therefore complies with the holistic 'Placemaking' approach advocated by Planning Policy Wales (Edition 10, p. 16). The Vision also accurately reflects the Well-being Goals set out within the WBFGA.

BDW Homes particularly welcomes direct references within the Vision to securing prosperous, cohesive and sustainable communities and the economic aspirations associated with the Swansea Bay City Region.

#### Council's Initial Response

**Support welcomed**

#### Action

**No change to the Plan.**

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## 7. Strategic Objectives

### Paragraph Para 7.6

#### *Representation(s)*

**3556 Mineral Products Association Wales (Mr Nick Horsley) [3778] Object**

#### *Summary:*

Objection to the format of the sustainability objectives under paragraph 7.6:

The formatting of the document appears to have caused confusion in that SO5 appears before SO3 and SO4.

Amend the formatting of the document and ensure SO3, SO4 and SO5 appear in the correct order.

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#### *Council's Initial Response*

**Disagree. The matters raised do not cause undue issues in the readability of the document. The Carmarthenshire Well Being Plan's wellbeing objectives have been utilised to group the Revised LDP's Strategic Objectives. This ensures that a local interpretation of wellbeing is interwoven into the strategic objectives and the Plan's strategy from the outset. The actual number attributed to a strategic objective is immaterial.**

#### *Action*

**No change to the Plan.**

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**Representation(s)****3557 Mineral Products Association Wales (Mr Nick Horsley) [3778]****Object****Summary:**

Objection to Paragraph 7.6:

It is not clear why the provision of an adequate supply of minerals is not identified as a Strategic Objective. This is a fundamental requirement of PPW and the need for minerals is the thread which stitches together many of the strategic objectives identified, providing raw materials to deliver the employment, housing, climate change, infrastructure, transport and environmental aspirations.

Include a further Strategic Objective to reflect the need for an adequate supply of minerals.

**Council's Initial Response**

**Disagree. Reference is made to Strategic Objective (SO) 7. It is considered that the reference in SO7 to "efficient use and safeguarding of resources" provides an adequate high level 'hook' for the consideration of this important matter for the Plan. The more detailed policies - notably those listed under Strategic Policy 18 - undertake to provide the required detail.**

**The strategic objectives have been subject to significant levels of consensus building and are considered robust in their current form. Further information is available in the Issues, Vision and Objective Topic Paper (December 2019), together with a suite of other documents available on the Council's website.**

**Action****No change to the Plan.****Representation(s)****4129 Seasons Holidays plc ( \_ \_ \_ ) [5149]****Support****Agent: Lichfields (Mr Owain Nedin) [4937]****Summary:**

Supports in that it sets a clear aspiration for the Plan and seeks to deliver on an identified LDP issue, however it can only be effective if the policy beneath it is framed to enable its delivery.

**Council's Initial Response****Support welcomed.****Action****No change to the Plan.**

Para 7.6, Strong Connections - Strongly connected people, places and organisations that are

**Paragraph Para 7.6, Strong Connections - Strongly connected people, places and organisations that are able to adapt to change.**

*Representation(s)*

**3466 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830] Support**

*Summary:*

As mentioned above (see rep 3465), the availability or capacity of infrastructure is a key aspect in determining the sustainability of a settlement, therefore we support the inclusion of SO6.

*Council's Initial Response*

**Support welcomed.**

**(For cross reference purposes the Council's response to representation reference number 3465 can be viewed under its responses to representations received on paragraph 5.6).**

*Action*

**No change to the Plan.**

*Representation(s)*

**3265 Barratt David Wilson Homes (Mrs Francesca Evans) [4879] 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.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**



Para 7.6, Prosperous People and Places - To maximise opportunities for people and places in

**Paragraph Para 7.6, Prosperous People and Places - To maximise opportunities for people and places in both urban and rural parts of our county.**

*Representation(s)*

**3469 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830] Support**

*Summary:*

As mentioned above (see rep 3465), the availability or capacity of infrastructure is a key aspect in determining the sustainability of a settlement, therefore we support the inclusion of SO14.

*Council's Initial Response*

**Support welcomed**

**(For cross reference purposes the Council's response to representation reference number 3465 can be viewed under its responses to representations received on paragraph 5.6).**

*Action*

**No change to the Plan**

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*Representation(s)*

**3266 Barratt David Wilson Homes (Mrs Francesca Evans) [4879] Support**

*Summary:*

BDW Homes supports Strategic Objective SO10, which refers to the delivery of an appropriate number and mix of new housing to meet society's needs. The need to ensure that "there is sufficient housing land available to meet the need for new private market and affordable housing" is one of the key issues within the 'Active & Social Places' theme within Planning Policy Wales.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

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## 8. Strategic Growth and Spatial Options

### Paragraph 8. Strategic Growth and Spatial Options

#### Representation(s)

**3849 Welsh Government (Mr Mark Newey) [13]**

**Object**

#### Summary:

Category B - Growth Levels: Homes and Jobs

The Preferred Strategy tested 6 demographic and 2 employment-led growth scenarios. The Authority concluded that the 'PG Long Term' scenario based on internal migration rates and international migration flows over a 16-year period (2001/2-2016/17) was the preferred growth option. In the local context, natural growth is negative in Carmarthenshire with deaths exceeding births and net migration becoming the main driver of population change. The Preferred Strategy proposed a 6% flexibility allowance (of 593 units) to deliver a housing requirement of 9,887 dwellings.

At Deposit stage a further 3 scenarios were tested by Edge Analytics (September 2019) to incorporate the latest demographic evidence, including the 2018 mid-year population estimates, and to exclude areas in Carmarthenshire located in the Brecon Beacons National Park Authority (BBNPA). The 3 demographic scenarios tested internal migration and international migration flows over a 'PG Short Term' (4 year) 'PG 10 year' and 'PG Long Term' (17 year) period, which resulted in a dwelling requirement of 8,769, 8,835 and 10,065 units respectively using an alternative vacancy rate of 3.4% based on local council tax records.

The Deposit plan is based on the 'PG 10-year' scenario which results in a dwelling requirement of 8,835 units (assuming migration flows of +1,337 persons per year). This is a reduction of 1,052 dwellings from the Preferred Strategy and an increase of 7,565 units above the WG-2018 based principal household projections. The housing requirement of 8,835 units is a reduction of 6,362 dwellings from the housing requirement (15,197 homes) in the adopted plan.

Evidence in the 'Edge Analytics Study' (2018) explains that the 2 employment-led scenarios would result in a requirement for 17,396 and 19,690 homes over the plan period, which the Council recognise is a high level of growth that would be undeliverable and unsustainable in Carmarthenshire. Housing completions over a 12-year period (2007/8-2018/19) averaged 485 dwellings per annum with recent completions from 2015 averaging 507 dwellings per annum. The Council has chosen a demographic growth scenario that will support employment growth and the delivery of 5,310 jobs (354 per annum) over the plan period. The Authority must fully evidence and explain how the scale of growth relates to the latest projections taking account of housing need and impacts on the Welsh language. (See comments on the spatial strategy). The evidence needs to demonstrate where in-migration will be derived from, i.e. neighbouring counties, elsewhere in Wales, the UK, or international migration taking into account the likely effect of UK immigration policy.

As the Welsh Government 2018-based projections were published in February 2020, the Council will need to consider their implications on the plan. The Council will need to ensure the level of growth is deliverable, the levels of migration can be achieved and impacts on the Welsh Language have been fully considered.

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*Council's Initial Response*

The Council will undertake further evidential work relating to Population projections, Household projections and migration data, including an analysis on the most recently published data and trends.

In regards to matters raised on the Welsh language, Section 2.4 of the Carmarthenshire Welsh Language Impact Assessment (WLIA - December 2019) outlines an assessment of the Deposit LDP's Growth Strategy on the Welsh language.

The assessment concludes that based on assumptions about the characteristics of 2011 in-migrants, migration, the net change in population scenario figures and the success of the County's Welsh Language Education Strategy, the numbers of Welsh speakers could possibly be higher than the WG 2033 Trajectory by 4,206. This suggests a likely reduction of 1.5 percentage points from the WG 2014 Trajectory scenario (of 52.0%). (see WLIA para 53 - Key Finding). The Preferred Growth Strategy is assessed as having a minor negative likely impact.

Appendix 2.4 and Appendix 2.5 of the WLIA provide an analysis of migration figures which indicate that a significant number of migrants to and from the County are moving within Wales.

Further evidence will be produced ahead of the submission of the Plan for Examination. This includes building upon the Welsh Language Impact Assessment, undertaking further analysis work in terms of population and household projections/ migration data and also updating the Two County Economic Study for Carmarthenshire and Pembrokeshire (October 2019). This update to the Economic Study will further consider the links between the Welsh language and the economy in the two Counties.

*Action*

No change to the Plan.



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*Representation(s)***4365 Welsh Government: Welsh Language Commissioner (Ms Meinir Jones) [9159]***Summary:*

Mae'r targed newydd o ran tai, sef 8,835, yn llawer uwch na'r angen am dai newydd yn seiliedig ar amcanestyniadau Llywodraeth Cymru a eglurir yn adran 8.2 o'r Cynllun. Rydym yn deall mai'r rheswm dros ddefnyddio amcanestyniad gwahanol yw er mwyn cyflawni amcanion ac uchelgeisiau economaidd y Cyngor a chreu swyddi. Gall gosod targed tai newydd mor uchel arwain at roi straen ar seilwaith y sir a'i gwneud hi'n anoddach i fodloni rhai o amcanion strategol eraill y Cynllun Datblygu, gan gynnwys o ran yr iaith Gymraeg.

The new housing target of 8,835 is significantly higher than the need for new housing based on Welsh Government projections explained in section 8.2 of the Plan. We understand that the justification for using a different projection is to realize the Council's economic objectives and ambitions and to create jobs. Setting such a high new housing target can lead to putting strain on the county's infrastructure and make it harder to meet some of the Development Plan's other strategic objectives, including the one on the Welsh language.

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*Council's Initial Response*

**Nodir y sylwadau.**

**Cafodd Strategaeth y Cynllun a'i ddull cynaliadwy o ddarparu tai newydd ei seilio ar egwyddorion datblygu cynaliadwy ac yn unol â darpariaethau'r polisi cynllunio cenedlaethol. Mae'r ffigur gofyniad tai ar gyfer y Sir yn seiliedig ar amcanestyniad 10 mlynedd o Dwf y Boblogaeth y mae tystiolaeth gadarn ohono - fodd bynnag, adolygir hyn cyn Archwilio'r Cynllun.**

**Mae'r safleoedd hynny a ddyrannwyd yn y CDLI at ddibenion preswyl wedi cael eu hystyried yn llawn trwy'r fethodoleg asesu safleoedd. Fel rhan o'r broses asesu hon, paratowyd ffurflen safle.**

**O ran dosbarthiad gofodol, mae'r Cynllun yn destun Arfarniad Cynaliadwyedd/Asesiad Amgylcheddol Strategol, a hefyd yn cael ei gefnogi gan Asesiad o'r Effaith ar y Gymraeg (Rhagfyr 2019).**

**Comments noted.**

**The Plan's Strategy and its sustainable approach to the provision of new homes has been formulated on the basis of sustainable development principles and in accordance with the provisions of national planning policy. The housing requirement figure for the County is based on the Population Growth (PG) - 10yr projection scenario which is robustly evidenced - however this will be reviewed ahead of the Examination of the Plan.**

**Those sites allocated within the LDP for residential purposes have been subject to full consideration in accordance with the site assessment methodology. As part of this assessment process a site pro forma has been prepared.**

**In terms of spatial distribution, the Plan is subject to Sustainability Appraisal / Strategic Environmental Assessment, whilst it is also supported by a Welsh language Impact Assessment (December 2019).**

*Action*

**Dim newid i'r Cynllun.**

**No change to the Plan.**



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*Representation(s)*

**3934 Pegasus Group (Daniel Millward) [5095]**

**Object**

*Summary:*

Objection to Chapter 8 - Strategic Growth and spatial Options

Whilst we are broadly supportive of the preferred Spatial Option, we feel that it needs to be more explicit in stating that the strategy needs to align with the ambitious economic aspirations of the plan.

At present, we do not feel that this is reflected in the proposed Spatial Option and, therefore, it has not been fully justified in the context of the Council's economic growth ambitions.

This does not require wholesale changes to the proposed Spatial Option as this could still be community led and the delivery of sustainable development should be at the heart of all Plan strategies. However, we would wish to see it reflect the Council's ambitious economic growth aspirations and acknowledge that this will influence the spatial distribution of development.

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*Council's Initial Response*

**Disagree. The strategy of the revised LDP seeks to support the distribution of housing and economic growth which is of a scale and nature appropriate to its cluster. In this respect the revised LDP seeks to ensure that development is appropriate to the settlement and reflective of its ability to accommodate growth and the services and facilities available.**

*Action*

**No change to the Plan.**



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*Representation(s)*

**4193 Tata Steel Europe Limited ( \_ \_ \_ ) [5156]**

**Object**

**Agent: Turley Associates Ltd (Abi Roberts) [4717]**

*Summary:*

In reviewing the Council's published evidence we believe that it is necessary for the Council to re-visit its selection of a scenario which continues to be based on a trend-based demographic scenario and to adopt a more positive albeit reasonable position which aligns more closely with its own evidence base around the economic potential of Carmarthenshire as well as the need to provide for affordable housing and the higher resultant housing requirement it suggests. As a cross reference note - site based representations made by the respondent include the one that can be found under representation number 4191 (policy HOM1).

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*Council's Initial Response*

**Disagree. The Population and Household Projection Topic Paper and the evidence contained within the Demographic Forecasts undertaken by Edge Analytics (2018 and 2019) sets out the informing considerations and the justification for the population and household projections for the County.**

**In assessing and identifying the housing requirement for the Plan and in accordance with PPW 10 Para 4.2.6 the WG local authority level projections were utilised as a starting point. Edge Analytics sought to review and assess the appropriateness of the latest WG population and household projections for Carmarthenshire and sought to also provide an alternative suite of demographic and trend evidence to consider. The Council considers that an appropriate and deliverable housing requirement within the deposit Revised LDP factors in the ability to meet the strategic objectives and policies of the Council, retains the young within the county, delivers for the needs of all our communities both urban and rural, and provides the opportunity for job creation, amongst others.**

**Policy SP1 identifies that in meeting the overall requirement of 8,835 dwellings during the plan period, the housing supply is set at 10,160 dwellings (15% general flexibility above the requirement). Some 6,986 residential units will be provided through allocations and those sites considered to be existing commitments. The remainder of the housing requirement will be met through allowances for large and small windfall sites recognising their contribution to housing delivery across the plan area.**

**Consideration will be given as appropriate to the need to amend or update relevant background /topic papers or evidence prior to submission.**

*Action*

**No change to the Plan**



*Representation(s)*

**3252 Matthew Utting [2833]**

**Support**

*Summary:*

General Representations to Section 8, Paragraph No.8.8  
 Section 8 of the LDP considers a number of alternative Strategic Growth and Spatial Options to support the delivery of housing and employment growth in the County.  
 So far as Strategic Growth Options are concerned, paragraphs 8.6 to 8.8 of the LDP confirm preferred 'PG 10yr Scenario', which is forecast to deliver 8,835 new dwellings (589 new dwellings per annum) and the creation of 5,295 additional jobs (354 additional jobs per annum) over the LDP period 2018-2033. Regarding Spatial Options, paragraph 8.20 of the LDP confirms a preferred 'Balanced Community and Sustainable Growth Strategy', whose key components are summarised in paragraph 9.51 of the LDP to include these targets for new dwellings and new jobs, distributed to the most sustainable locations amongst the County's settlements, 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.

*Council's Initial Response*

**Support Welcomed. Further evidential work will be undertaken prior to the examination into the LDP.**

*Action*

**No change to the Plan**

*Representation(s)*

**4192 Tata Steel Europe Limited ( \_ \_ \_ ) [5156]**

**Support**

**Agent: Turley Associates Ltd (Abi Roberts) [4717]**

*Summary:*

Strongly supportive of the overall approach taken by the Council in identifying a preferred option for growth which exceeds that implied by the latest official household projections alone. We also support the Council's acknowledgement of the importance, when identifying an appropriate level of growth, of understanding the relationship with the Council's economic objectives and specifically the implied changing demographic profile of its population where a continuation of recent trends are sustained. As a cross reference note - site based representations made by the respondent include the one that can be found under representation number 4191 (policy HOM1).

*Council's Initial Response*

**Support welcomed.**

**Reference should be had to Representation Number 4191.**

*Action*

**No change to the Plan.**



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**Paragraph Strategic Growth Options**

*Representation(s)*

**3817 Lightwood Planning (Mr Richard Walker) [5065]**

**Object**

*Summary:*

We conclude that the proposed requirement is far too low. At the very least it should be 10,065 homes (baseline), With a 15% uplift for flexibility generating a supply figure of 11,575 homes. This generates a need for another 1,415 homes.

We would also say that we are not convinced that a baseline requirement of 14,090 homes and 632 jobs per annum is 'undeliverable' in terms of housing or employment growth. It is not unsustainable socio-economically.

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*Council's Initial Response*

**Disagree. The Population and Household Projection Topic Paper and the evidence contained within the Demographic Forecasts undertaken by Edge Analytics (2018 and 2019) sets out the informing considerations and the justification for the population and household projections for the County.**

**In assessing and identifying the housing requirement for the Plan and in accordance with PPW 10 Para 4.2.6 the WG local authority level projections were utilised as a starting point. Edge Analytics sought to review and assess the appropriateness of the latest WG population and household projections for Carmarthenshire and sought to also provide an alternative suite of demographic and trend evidence to consider.**

**The Council considers that an appropriate and deliverable housing requirement within the deposit Revised LDP factors in the ability to meet the strategic objectives and policies of the Council, retains the young within the county, delivers for the needs of all our communities both urban and rural, and provides the opportunity for job creation, amongst others.**

**Policy SP1 identifies that in meeting the overall requirement of 8,835 dwellings during the plan period, the housing supply is set at 10,160 dwellings (15% general flexibility above the requirement). Some 6,986 residential units will be provided through allocations and those sites considered to be existing commitments. The remainder of the housing requirement will be met through allowances for large and small windfall sites recognising their contribution to housing delivery across the plan area.**

**Consideration will be given as appropriate to the need to amend or update relevant background /topic papers or evidence prior to submission.**

*Action*

**No change to the Plan**



*Representation(s)*

**3470 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830] Support**

*Summary:*

We note that the Council propose to use the Population Growth Long Term scenario which sets a housing supply of 10,160 units over the LDP Period.

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*Council's Initial Response*

**Comments noted.**

*Action*

**No change to the Plan.**

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**Paragraph Para 8.1**

*Representation(s)*

**3296 Barratt David Wilson Homes (Mrs Francesca Evans) [4879] Support**

*Summary:*

BDW Homes agrees with the Council that the 2014-based projections would deliver a negative job creation value and therefore would, in effect, comprise 'planning for decline'. Carmarthenshire County Council is therefore correct in its approach by utilising the 2014-based Household Projections simply as a starting point. BDW Homes supports the Council's conclusions that reliance upon the 2014-based projections in isolation is not appropriate given its aspirations for economic growth and other evidence must be taken into account.

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*Council's Initial Response*

**Support Welcomed.**

*Action*

**No change to the Plan.**

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**Paragraph Para 8.7**

*Representation(s)*

**3297 Barratt David Wilson Homes (Mrs Francesca Evans) [4879]**

**Object**

*Summary:*

BDW Homes is broadly 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. However, BDW feels that a higher level of growth should now be sought on the basis of the National Development Framework's aspirations for the South West National Growth Area, with its focus on the Llanelli Area and the secondary town of Carmarthen.

*Council's Initial Response*

**Disagree.**

**The level of growth set out within the revised LDP is much higher than the level of growth apportioned to the South West area as defined with Future Wales (NDF). This reflects the ambitious growth levels set within the LDP to support regeneration, the economy and the future of our communities.**

**The revised LDP's proposed growth levels are robustly evidenced.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4583 Ceredigion County Council (Anjuli Davies) [5303]**

**Object**

*Summary:*

Whilst Ceredigion County Council supports the ambitious the level of housing growth proposed, the Council are concerns that it may not be easily absorbed by parts of the County, particularly the settlements along the Teifi Valley

*Council's Initial Response*

**Noted. The strategy of the revised LDP seeks to support the distribution of housing and economic growth which is of a scale and nature appropriate to its cluster. In this respect the revised LDP seeks to ensure that development is appropriate to the settlement and reflective of its ability to accommodate growth and the services and facilities available.**

*Action*

**No change to the Plan.**

**Paragraph Para 8.14**

*Representation(s)*

**3155 Professor John Finney [4854]**

**Support**

*Summary:*

Housing development without employment opportunities in the same broad location, and vice versa, is not just 'less sustainable' but is UNSustainable. I am pleased that the LDP recognises the problem of new housing where local employment is not available just increases unsustainable commuting, but think such development should not just be avoided, but disallowed.

*Council's Initial Response*

**Noted. The Plan seeks to distribute and deliver growth in a sustainable manner.**

*Action*

**No change to the Plan.**

**Paragraph Preferred Option - Balanced Community and Sustainable Growth Strategy**

*Representation(s)*

**3298 Barratt David Wilson Homes (Mrs Francesca Evans) [4879]**

**Object**

*Summary:*

BDW Homes is broadly supportive of the 'Balanced Community and Sustainable Growth Strategy' and note that the strategy considers the role and function of settlements in seeking to assign growth. This should ensure that new housing is directed to those areas that are likely to attract higher levels of employment generation. In this regard, it is considered that more growth could be accommodated within the Llanelli and South Gwendraeth Area.

*Council's Initial Response*

**Disagree. The strategy of the revised LDP seeks to support the distribution of growth which is of a scale and nature appropriate to its cluster. In this respect the revised LDP seeks to ensure that development is appropriate to the settlement and reflective of its ability to accommodate growth and the services and facilities available.**

*Action*

**No change to the Plan.**

**Paragraph Para 8.20**

*Representation(s)*

**3935 Pegasus Group (Daniel Millward) [5095]**

**Object**

*Summary:*

Objection to Paragraph 8.20, which sets out the preferred Spatial Option.

Whilst we are broadly supportive of the preferred Spatial Option, we feel that it needs to be more explicit in stating that the strategy needs to align with the ambitious economic aspirations of the plan.

At present, we do not feel that this is reflected in the proposed Spatial Option and, therefore, it has not been fully justified in the context of the Council's economic growth ambitions.

This does not require wholesale changes to the proposed Spatial Option as this could still be community led and the delivery of sustainable development should be at the heart of all Plan strategies. However, we would wish to see it reflect the Council's ambitious economic growth aspirations and acknowledge that this will influence the spatial distribution of development.

*Council's Initial Response*

**Disagree. The strategy of the revised LDP seeks to support the distribution of housing and economic growth which is of a scale and nature appropriate to its cluster. In this respect the revised LDP seeks to ensure that development is appropriate to the settlement and reflective of its ability to accommodate growth and the services and facilities available.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3471 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]**

**Support**

*Summary:*

Whilst we are supportive of the hybrid option and are pleased to note that it acknowledges the need to be supported by a range of appropriate infrastructure, there will inevitably be certain areas - particularly in the more rural locations of the County - where water or sewerage infrastructure is limited in its availability.

*Council's Initial Response*

**Comments noted.**

*Action*

**No change to the Plan.**

## 9. A New Strategy

### Paragraph 9. A New Strategy

#### *Representation(s)*

**4026 Dyfodol (J W Thomas) [563]**

**Object**

***Summary:***

Rydym yn credu y dylai strategaeth y CDLI ganiatáu ar gyfer adeiladu llai o anheddau. Mae gennym bryderon y bydd y ddarpariaeth o ran tai yn fwy na'r galw ar gyfer y boblogaeth leol ac y byddant yn cael eu defnyddio gan bobl sy'n symud i'r sir, a gallai hynny gael effaith negyddol ar y Gymraeg yn Sir Gaerfyrddin. Rydym yn credu y byddai darparu 5,000 o dai newydd yn darged mwy realistig.

We consider that the LDP's strategy should allow for less dwellings to be built. We have concerns that the housing provision will exceed demand from the local population and be occupied by people moving into the County which could have a negative impact upon the Welsh language in Carmarthenshire. We believe that the provision of 5,000 new homes would be a more appropriate target.

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*Council's Initial Response*

**Nodir y sylwadau.**

**Cafodd Strategaeth y Cynllun a'i ddull cynaliadwy o ddarparu tai newydd ei seilio ar egwyddorion datblygu cynaliadwy ac yn unol â darpariaethau'r polisi cynllunio cenedlaethol. Mae'r ffigur gofyniad tai ar gyfer y Sir yn seiliedig ar amcanestyniad 10 mlynedd o Dwf y Boblogaeth y mae tystiolaeth gadarn ohono - fodd bynnag, adolygir hyn cyn Archwilio'r Cynllun.**

**Mae'r safleoedd hynny a ddyrannwyd yn y CDLI at ddibenion preswyl wedi cael eu hystyried yn llawn trwy'r fethodoleg asesu safleoedd. Fel rhan o'r broses asesu hon, paratowyd ffurflen safle.**

**O ran dosbarthiad gofodol, mae'r Cynllun yn destun Arfarniad Cynaliadwyedd/Asesiad Amgylcheddol Strategol, a hefyd yn cael ei gefnogi gan Asesiad o'r Effaith ar y Gymraeg (Rhagfyr 2019).**

**Comments noted.**

**The Plan's Strategy and its sustainable approach to the provision of new homes has been formulated on the basis of sustainable development principles and in accordance with the provisions of national planning policy. The housing requirement figure for the County is based on the Population Growth (PG) - 10yr projection scenario which is robustly evidenced - however this will be reviewed ahead of the Examination of the Plan.**

**Those sites allocated within the LDP for residential purposes have been subject to full consideration in accordance with the site assessment methodology. As part of this assessment process a site pro forma has been prepared.**

**In terms of spatial distribution, the Plan is subject to Sustainability Appraisal / Strategic Environmental Assessment, whilst it is also supported by a Welsh Language Impact Assessment (December 2019).**

*Action*

**Dim newid i'r Cynllun.**

**No change to the Plan.**



**Representation(s)****4598 Rhanbarth Sir Gâr Cymdeithas yr Iaith (Rhanbarth Sir Gâr) [2370]****Object****Summary:**

Cydnabyddwn fod amcanion y Cynllun Datblygu Lleol Diwygiedig yn uchelgeisiol a bod dyhead y Cyngor Sir i hwyluso creu swyddi o ansawdd uchel yn un clodwiw. Wedi dweud hynny a wedi dadansoddi'r dogfennau perthnasol yn fanwl, rydym yn gorfod mynegi pryderon difrifol am effaith y cynllun ar y Gymraeg a rhai o gymunedau ac ardaloedd Cymreiciaf Sir Gâr. Credwn nad yw elfennau allweddol o'r cynllun diwygiedig yn seiliedig ar dystiolaeth gadarn, a bod tipyn o waith i'w wneud i sicrhau dyfodol hyfyw i'r Gymraeg cyn i'r Cyngor gyflwyno'r Cynllun Adneuo i'r Llywodraeth. Nid oes unrhyw ddadansoddiad o sut y gall creu nifer sylweddol o swyddi mewn un gornel o'r sir gyflawni'r nod atal yr allfudiad difrifol o bobl ifainc o'n cymunedau ledled y sir. Camgymeriad sylfaenol yw fod y Cynllun yn trin adfywiad economiadd ac adfywiad iaith a chymunedol fel dau beth ar wahân yn lle ystyriaeth fanwl o ba fath ar ddatblygu economaidd a fydd o fudd pennaf i'r iaith ac i'n cymunedau.

We recognise that the objectives of the Revised Local Development Plan are ambitious and that the County Council's aspiration to facilitate the creation of high quality jobs is commendable. Having said that and having analysed the relevant documents in detail, we have to express serious concerns about the impact of the scheme on the Welsh language and some of the most Welsh communities and areas of Carmarthenshire. We believe that key elements of the revised scheme are not based on sound evidence, and that there is some work to be done to ensure a viable future for the Welsh language before the Council submits the Deposit Plan to the Government. There is no analysis regarding how creating a significant number of jobs in one corner of the county can achieve the aim of preventing the substantial outward migration of young people from our communities across the county. A fundamental mistake is that the Plan treats economic regeneration and language and community regeneration as two separate things instead of detailed consideration of what kind of economic development will be in the best interests of the language and our communities.



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*Council's Initial Response*

**Nodir y sylwadau.**

**Bydd rhagor o dystiolaeth yn cael ei darparu cyn cyflwyno'r Cynllun i'w Archwilio. Mae hyn yn cynnwys adeiladu ar yr Asesiad o'r Effaith ar y Gymraeg (Rhagfyr 2019), ymgymryd â gwaith dadansoddi pellach o ran Rhagamcanion poblogaeth ac Aelwydydd / data mudo a hefyd diweddarau yr Astudiaeth Economaidd Dwy Sir ar gyfer Sir Gaerfyrddin a Sir Benfro (Hydref 2019). Bydd y diweddariad yma i'r Astudiaeth Economaidd yn rhoi ystyriaeth bellach i gysylltiadau rhwng y Gymraeg a'r economi yn y ddwy Sir.**

**Comments noted.**

**Further evidence will be produced ahead of the submission of the Plan for Examination. This includes building upon the Welsh Language Impact Assessment (December 2019), undertaking further analysis work in terms of population and household projections/ migration data and also updating the Two County Economic Study for Carmarthenshire and Pembrokeshire (October 2019). This update to the Economic Study will further consider the links between the Welsh language and the economy in the two Counties.**

*Action*

**Dim newid i'r Cynllun.**

**No change to the Plan.**



**Representation(s)****4601 Rhanbarth Sir Gâr Cymdeithas yr Iaith (Rhanbarth Sir Gâr) [2370]****Object****Summary:**

Mae Cymdeithas yr Iaith yn rhannu'r farn gyffredin i'r Cynllun Datblygu Lleol presennol fod yn fethiant, ac roeddem yn gobeithio y byddai'r Cyngor yn achub ar y cyfle i lunio cynllun diwygiedig a fyddai'n newid cyfeiriad trwy flaenoriaethu lles cymunedau ledled y Sir a rhoi lle canolog i'r Gymraeg. Siomedig felly yw gweld strategaeth gorfforaethol sydd yn canolbwyntio ar gyflawni ychydig o ddatblygiadau anferth yn ne a dwyrain y Sir yn hytrach na rhaglen arloesol o hyrwyddo datblygiadau a chyfleoedd cyflogaeth ar raddfa llai ledled Sir Gaerfyrddin. Teimlwn yn gryf fod diffyg tystiolaeth o ran y dyraniadau tai a safleoedd cyflogaeth. Nid yw gobaith ac uchelgais yr un peth â thystiolaeth. Croesawn rai o'r camau y mae'r Cyngor am eu gwneud i liniaru ac asesu effaith datblygiadau ar yr iaith, ond fel y nodwyd yn ein hymateb, mae cryn dipyn o waith i'w wneud o hyd, a'r pryder yw y caiff buddiannau cymunedau Cymraeg eu gosod yn ail i amcanion strategaeth adfywio'r Cyngor Sir, strategaeth sydd yn ei hanfod yn edrych yn hen ffasiwn erbyn hyn. Trist yw dweud bod y Cyngor wedi colli cyfle i newid cyfeiriad. Nodir fod Cymdeithas yn dyfynu nifer o sylwadau o Llywodraeth Cymru ac un ymateb o'r Cyngor Sir i'r 'Ymgynghoriad Cychwynnol' (Nodyn - mae hwn yn debygol o fod yn gyfeiriad at yr ymgynghoriad ar y Strategaeth a Ffeirir).

Cymdeithas yr Iaith shares the common view that the current Local Development Plan has been a failure, and we hoped that the Council would take the opportunity to draw up a revised plan that would change direction by prioritising the well-being of communities throughout the County and putting the Welsh language at its heart. It is therefore disappointing to see a corporate strategy which focuses on delivering a few huge developments in the south and east of the County rather than an innovative programme of promoting smaller-scale employment developments and opportunities across Carmarthenshire. We feel strongly that there is a lack of evidence in terms of housing allocations and employment sites. Hope and ambition are not the same as evidence. We welcome some of the steps that the Council wants to take to mitigate and assess the impact of developments on the language, but as noted in our response, there is still a great deal of work to be done, and the concern is that the interests of Welsh-speaking communities will become second place to the objectives of the County Council's regeneration strategy, a strategy that is essentially now looking outdated. It is sad to say that the Council has missed an opportunity to change direction. Noted that Cymdeithas quote a number of comments by the Welsh Government and one response from the County Council to the 'initial consultation' (Note this is likely to be referring to the consultation on the Preferred Strategy).

*Council's Initial Response*

**Nodir y sylwadau.**

**Mae strategaeth y Cynllun yn ceisio sicrhau twf cytbwys sy'n canolbwyntio ar ddiwallu anghenion ein cymunedau ac yn cyflawni amcanion strategol ac adfywio'r Cyngor a'r rhanbarth. Adfywio yw prif amcan y Cyngor, fel rhan o'i bolisi corfforaethol, ac er mwyn i'r CDLI Diwygiedig gael ei gyflawni, mae'n rhaid iddo ddarparu mynegiant defnydd tir o'r cyfeiriad teithio corfforaethol hwn. Adlewyrchir hyn drwy: Bargaen Ddinesig Bae Abertawe, Trawsnewidiadau - Cynllun Adfywio ar gyfer Sir Gaerfyrddin - Symud Ymlaen yn Sir Gaerfyrddin: Strategaeth Gorfforaethol Newydd y Cyngor 2018 - 2033 a Symud Sir Gâr Wledig Ymlaen 2019. Mae'r dull hwn hefyd yn cydymffurfio â phrawf allweddol cadernid (Prawf 1: A yw'r Cynllun yn Cydweddu?)**

**Mae'r Cynllun yn ceisio darparu cyfleoedd yn cynnwys darparu ar gyfer tai newydd, gan gynnwys tai fforddiadwy a swyddi, yn ogystal â llywio buddsoddiad newydd a blaenoriaethau o ran seilwaith, gan barchu ffabrig cymdeithasol y Sir ar yr un pryd, gan gynnwys y Gymraeg, diwylliant Cymreig a'i naws am le.**

**Comments noted.**

**The Plan's 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. The Council, as part of its corporate policy, places regeneration as its number one objective and for the Revised LDP to be deliverable it must provide a land use expression of this corporate direction of travel. This is reflected through: The Swansea Bay City Deal, Transformations - Carmarthenshire Regeneration Plan - Moving Forward in Carmarthenshire: The Council's New Corporate Strategy 2018 - 2033 and Moving Rural Carmarthenshire Forward 2019. This approach also conforms to a key test of soundness (Test 1: Does the Plan Fit?)**

**The Plan seeks to provide opportunities include the provision for new homes including affordable homes and jobs, as well as steering new investment and infrastructural priorities, whilst also respecting the County's social fabric, including the Welsh language, culture and its sense of place.**

*Action*

**Dim newid i'r Cynllun.**

**No change to the Plan.**



**Representation(s)****4602 Rhanbarth Sir Gâr Cymdeithas yr Iaith (Rhanbarth Sir Gâr) [2370]****Object****Summary:**

O rhan tystiolaeth economiadd, yn amlwg, fe fu newid anferth yn rhagolygon economaidd Cymru a Phrydain ers inni ymateb i'r ymgynghoriad cychwynnol. Tynnodd ein hymateb cyntaf sylw at strategaeth adfywio'r Cyngor Sir oedd am greu rhyw 5,200 o swyddi newydd ar sail cynnydd o 8.1% yn y boblogaeth dros gyfnod y Cynllun diwygiedig. Nododd Cymdeithas yr Iaith a chyrrff eraill, gan gynnwys Llywodraeth Cymru, fod yna ddiffyg tystiolaeth i gyfiawnhau'r amcanion hyn. Er enghraifft, nid oedd sôn am effaith Brexit ar yr economi. Yn y cyfamser, mae'r sefyllfa wedi gwaethygu'n sylweddol. Crebachodd economi Prydain o 2.2.% yn chwarter cyntaf 2020, ac fe grebachodd 20.4% ymhellach yn yr ail chwarter. Yn ôl y Llywodraeth yn San Steffan bydd yr economi 10.1% yn llai erbyn diwedd y flwyddyn, ac er y disgwylir twf cymhedrol yn 2021, yn ôl y Trysorlys, ni fydd yr economi wedi adennill y cwmp hwn erbyn diwedd y flwyddyn nesaf. Ar ben hynny, mae Llywodraeth y DU yn disgwyl gostyngiad o 7.6% ym maint yr economi dros gyfnod o 15 mlynedd o ganlyniad i adael yr Undeb Ewropeaidd, os na fydd cytundeb, a gostyngiad o 4.9% dros yr un cyfnod os bydd cytundeb masnach rhydd rhwng y DU a'r UE. Yn wyneb y datblygiadau hyn, mae'n anodd peidio â dod i'r casgliad bod sail y Cynllun yn edrych yn fwy afrealistig byth. O ganlyniad, mae Cymdeithas yr Iaith yn galw ar y Cyngor i ailystyried ei strategaeth.

In terms of economic evidence, clearly, there has been a huge change in the economic forecasts for Wales and Britain since we responded to the initial consultation in February. Our first response highlighted the County Council's regeneration strategy which wished to create some 5,200 new jobs based on an 8.1% increase in population over the period of the revised Scheme. Cymdeithas yr Iaith and other organizations, including the Welsh Government, noted that there was a lack of evidence to justify these objectives. For example, there was no mention of the impact of Brexit on the economy. In the meantime, the situation has deteriorated considerably. Britain's economy shrank by 2.2.% in the first quarter of 2020, and it shrank by a further 20.4% in the second quarter. According to the Government in Westminster, the economy will have shrunk by 10.1% by the end of the year, and although moderate growth is expected in 2021, according to the Treasury, the economy will not have recovered from this by the end of next year. Furthermore, the UK Government expects a 7.6% reduction in the size of the economy over a 15-year period as a result of leaving the European Union, if there is no deal, and a 4.9% reduction over the same period if there is a free trade deal between the UK and the EU. In light of these developments, it is difficult not to conclude that the basis of the Plan looks even more unrealistic. As a result, Cymdeithas yr Iaith is calling on the Council to reconsider its strategy.

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*Council's Initial Response*

**Nodir y sylwadau.**

**Bydd rhagor o dystiolaeth yn cael ei darparu cyn cyflwyno'r Cynllun i'w Archwilio. Mae hyn yn cynnwys diweddarau yr Astudiaeth Economaidd Dwy Sir ar gyfer Sir Gaerfyrddin a Sir Benfro (Hydref 2019). Bydd y diweddariad yma i'r Astudiaeth Economaidd yn rhoi ystyriaeth bellach i gysylltiadau rhwng y Gymraeg a'r economi yn y ddwy Sir.**

**Comments noted.**

**Further evidence will be produced ahead of the submission of the Plan for Examination. This includes updating the Two County Economic Study for Carmarthenshire and Pembrokeshire (October 2019). This update to the Economic Study will further consider the links between the Welsh language and the economy in the two Counties.**

*Action*

**Dim newid i'r Cynllun.**

**No change to the Plan.**



*Representation(s)*

**4468 Calon Cymru Network CIC (Dr Pat Racher) [5222]**

**Object**

*Summary:*

Whilst the preferred option has the benefits of being 'community led' and of removing 'the prescriptive approach in assigning character areas within the county', Calon Cymru is sceptical, though, about the concept of 'sustainable growth'. Calon Cymru argues that sustainability requires 'no-growth development', a fundamental change away from simply 'greening' while still maximising production and consumption, towards 'non-material growth' that includes increased well-being, better quality of our environment, more jobs, and building resilient communities.

We welcome the sharper focus on rural areas in the preferred option, however, we feel that the plan relies overmuch on the expectation that change will be slow and steady enough for the future to be similar to the past. There is a probability that shocks to social, economic and environmental systems will be severe and unexpected. Carmarthenshire, and Wales, will require a higher level of self-sufficiency in basic foodstuffs, and those foods will need to come from the currently under-used countryside through horticulture. More horticulture calls for more people living in the countryside. Calon Cymru believes the planning framework should anticipate this necessary rural population increase.

*Council's Initial Response*

**The Plan is prepared within the context of National Planning Policy and legislation and whilst we note the reference to the planning framework should anticipate this necessary rural population increase this does not accord with the provisions of national policy. The Plan seeks to provide for all the County's communities in a responsible and balanced manner. In so doing it recognises and responds to the needs of communities in a manner which is reflective of evidence and in accordance with other plans, strategies and policies.**

**The preparation of the Plan is informed by the Sustainability Appraisal (including the Strategic Environmental Assessment) as well as the Habitat Regulations Assessment.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3868 Welsh Government (Mr Mark Newey) [13]**

**Object**

*Summary:*

Category B - Delivery and Implementation

The delivery of the strategy is reliant on the Authority allocating sites that are viable and deliverable in accordance with the spatial strategy and settlement hierarchy. The DPM sets out the key issues that must be addressed in Chapter 5 and the Council should ensure all relevant aspects are covered with particular attention on the de-risking checklist. To demonstrate site delivery and implementation the plan must be underpinned by site specific viability work, a robust housing trajectory and effective use of placemaking on key sites.

*Council's Initial Response*

**The Council is currently undertaking further evidential work on key sites which includes the undertaking of Statements of Common Ground to establish the certainty of these sites being delivered during the plan period. The SoCG will consider matters on viability and the housing trajectory timescales.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3936 Pegasus Group (Daniel Millward) [5095]**

**Object**

*Summary:*

Objection to Chapter 9 - A New Strategy.

The perceived reduced importance of delivering the Council's ambitious economic growth targets within the Preferred Spatial Option has manifested in what we consider to be an ineffective Plan Strategy.

This is because the Deposit Plan seeks to take a balanced approach to the distribution of housing supply (paragraph 9.4), despite the fact that it will be reliant on only a few key centres to deliver the vast majority of the economic growth it aspires to (namely, Llanelli, Ammanford/Cross Hands and Carmarthen).

The Plan Strategy needs to be more realistic in acknowledging that it cannot rely on lower order settlements and rural areas to deliver the economic growth it aspires to and that the Tier 1 settlements will likely need to play a greater role than is currently identified.

*Council's Initial Response*

**Disagree. The Plan's strategy seeks to deliver balanced growth which reflects the diverse nature of Carmarthenshire's communities in this respect. The scale of housing and economic growth potential is focused on the higher tiered settlements.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3551 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Support**

*Summary:*

We support the intent of the plan's policies and proposals to enable the delivery of sustainable development and ensure social, economic, environmental and cultural well-being goals are all suitably balanced in the decision-making process, so the right development occurs in the right place.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4200 Tata Steel Europe Limited ( \_ \_ \_ ) [5156]**

**Support**

**Agent: Turley Associates Ltd (Abi Roberts) [4717]**

*Summary:*

Support in terms of the recognition that Llanelli should be a focus for development in view of the sustainability and viability credentials of the area. It is considered vital to ensure that sufficient growth is directed to Llanelli in particular, in order to ensure economic growth in the area. As a cross reference note - site based representations made by the respondent include the one that can be found under representation number 4191 (policy HOM1).

*Council's Initial Response*

**Comments noted/ support welcomed**

*Action*

**No change to the Plan.**



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## Paragraph Para 9.3

### *Representation(s)*

4273 - RSAI - [4993]

Object

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

#### *Summary:*

The distribution of development across Cluster 2 is unsuitable and the sustainable and desirable settlement of Llangennech has been overlooked as a settlement to accommodate a fair and reasonable amount of residential development. Llangennech benefits from numerous facilities and services including School and GP Surgery and is well served by public transport in the form of a railway station and bus stops. It also benefits from an established employment area providing valuable job opportunities. No evidence has been put forward to explain why Llangennech has been apportioned the least amount of growth amongst the cluster 2 Service Settlements. There is no logic or consistency to this disproportionate approach given that Llangennech is a highly sustainable settlement with ample services and facilities. We note that Burry Port (another Service Centre) has been allocated 501 dwellings, nearly five times the amount of Llangennech whilst Trimsaran/Carway (also a Service Centre) has been allocated 283 dwellings. We consider that the distribution of development within Cluster 2 should be more balanced and proportionate. Also, Llangennech is within easy reach of junction 48 of the M4 meaning that development in Llangennech is unlikely to have as much impact on the A4138 as development in Llanelli and all the other Cluster 2 settlements with the exception of Hendy/Fforest. This is because traffic coming off the M4 to Llanelli, Burry Port, Kidwelly, Pembrey and Trimsaran/Carway will all need to travel on the A4138 and through Llanelli. Allocating significant development in the Service Centres beyond Llanelli is likely to lead to traffic implications as the infrastructure serving these centres all run through the town of Llanelli. Locating additional residential allocations in Llangennech as opposed to the settlements west of Llanelli will assist in delivering the housing requirement, in line with the settlement hierarchy, in a more proportionate manner which will, as a result assist in reducing the amount of traffic running through Llanelli. Particular reference is made to representations 4222 (comment on policy sp16) and 4227 (comment on policy sp16) where such matters are discussed further. Reference is also made to the promotion of the client's site under rep 4243 and the reference to with a view to ensuring that Llangennech remains a vibrant and viable settlement, additional housing in this area in the short term will assist in supporting the primary school. There is a risk that in delaying the vast majority of development until 2025-2030 that the settlement and its services and facilities will become stagnant. A critical mass is required in the short term to ensure the vibrancy of the town's facilities and services.

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*Council's Initial Response*

**Comments noted.**

**The Council considers that the level of growth earmarked for Llangennech in the Plan is appropriate and deliverable given its supportive role for Llanelli within the wider cluster 2. It is important to note that Llangennech has a role to play as part of the wider cluster 2 and not in isolation and as such the overall growth figure in cluster 2 retains a strong developmental focus within the Plan.**

**A notable consideration in the distribution of development is the importance of the Plan reflecting its evidence base in regards the Role and Function of its settlements. Reference should be made to the Role and Function Topic Paper (January 2020) which is a key piece of evidence in this regard.**

**Llangennech's development potential will be realised within the revised LDP, particularly noting the investment by Dwr Cymru Welsh Water in the WwTW. The Council recognises that Focused Changes are proposed in Llangennech - notably to sites Sec7/h4 and Sec7/h5, but it is considered that the role and function of the settlement is unaffected.**

**The sustainability and developmental attributes of Llangennech are noted. In this regard reference should be made to the Council's response to representation reference numbers 4222 and 4227 where the Council responds to such matters in detail. These responses can be viewed under the Council's responses to comments received under policy SP16.**

**Reference is also made to the Council's response to representation reference number 4240 which can be viewed under the Council's responses to comments received under policy SP3.**

**As a cross reference note, the Council's response to the promotion of the client's site under representation reference number 4243 can be viewed under the Council's responses to comments received under policy HOM1.**

*Action*

**No change to the Plan.**



**Paragraph Para 9.11**

*Representation(s)*

**3299 Barratt David Wilson Homes (Mrs Francesca Evans) [4879] Support**

*Summary:*

BDW supports the strategy of building in flexibility to ensure the delivery of sustainable growth and to overcome any potential unforeseen deliverability issues, in line with national guidance. However, the Council should ensure that sites are viable and deliverable before they are taken forward as firm allocations in the LDP. There are concerns about several sites and their ability to contribute to delivering the housing growth projected over the Plan period. Paragraph 4.2.10 of PPW (Edition 10) states that &quot;The supply of land to meet the housing requirement proposed in a development plan must be deliverable.&quot;

*Council's Initial Response*

**Noted. The allocation of sites within the LDP for residential purposes have been subject to full consideration through the site assessment methodology. As part of this assessment process detailed site pro formas have been prepared. Where necessary, further evidential work will be undertaken prior to the examination of the Plan.**

*Action*

**No change to the Plan**

**Paragraph Para 9.17**

*Representation(s)*

**4584 Ceredigion County Council (Anjuli Davies) [5303] Object**

*Summary:*

Additional wording to explain or summarise what conclusions the Rural Housing Needs Assessment drew, and how these informed the plan would be welcomed here.

*Council's Initial Response*

**Disagree. The rural housing needs survey forms part of the evidence base. It is not considered necessary to further supplement the Plans content with additional commentary on the evidence base.**

*Action*

**No change to the Plan.**

**Paragraph Para 9.20**

*Representation(s)*

**3558 Mineral Products Association Wales (Mr Nick Horsley) [3778] Support**

*Summary:*

Support for Paragraph 9.20 - that there is a clear recognition that a strong rural economy is essential to support sustainable and vibrant rural communities.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

**Paragraph Para 9.29**

*Representation(s)*

**3519 Ms Sally Bere [3602] Object**

*Summary:*

It is unclear how the full extent of the provisions of the Well being of Future Future Generations Act (2015) are to be integrated in to the landuse planning system.

I would therefore suggest that this section of para 9.29:

"..will seek to enhance the economic, social and environmental well-being of communities. It will also as part of this agenda play its part in tackling the causes and effects of climate change reflecting the contribution of the planning system as a whole."

be amended to:

'will seek to play its part in tackling the causes and effects of climate change reflecting the contribution of the planning system as a whole whilst enhancing the well being of communities by seeking a balance between the full range of sustainable development principles, as set out in para 9.31 below.'

*Council's Initial Response*

**Disagree.**

**The SA/SEA has facilitated a rigorous examination of the sustainability issues, challenges and opportunities facing Carmarthenshire. In doing so it is interwoven into the preparation of this LDP and was central to the development of the Issues and objectives.**

**The SA/SEA ensures that the principles of the Well-being of Future Generations (Wales) Act 2015 are at the heart of the planning process.**

**The proposed wording change does not create a manifest change to the intent of the Authority in this respect.**

*Action*

**No change to the Plan**

**Paragraph Para 9.31**

*Representation(s)*

**4469 Calon Cymru Network CIC (Dr Pat Racher) [5222]**

**Object**

*Summary:*

Agriculture is absent from measures to promote the principles of sustainability (section 9.31). The measures in 9.31 are all laudable, covering biodiversity, water, waste, energy, transport, language and culture, but there is no specific mention of food production. Instead, economic activities are aggregated together into the ambition to support 'the development of a resilient economy and facilitating appropriate future growth'. We would question the concept of 'future growth' and replace it with the steady state 'non-material growth' approach.

*Council's Initial Response*

**Disagree. The Plan intends to meet the growth requirements of the population from a land use perspective rather than promote non-sustainable material growth. The Plan acknowledges the importance of farming in rural areas and the potential to drive economies, provide jobs and drive growth in renewable energy and sustainable tourism. Reference is made to TAN 6 : Planning for Sustainable Rural Communities, which states the Government objective is ' a sustainable and profitable future for farming families and businesses through the production and processing of farm products while safeguarding the environment, animal health and welfare, adapting to climate change and mitigating its impacts, while contributing to the vitality and prosperity of our rural economies'**

**The Plan has been produced with regard to the Welsh Government policy 'Prosperity for All: Economic action plan' which sets out a pathway for sustainable economic growth.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3156 Professor John Finney [4854]**

**Support**

*Summary:*

These are all laudable aims with which I would agree. However, with respect to the first bullet "Protecting and enhancing biodiversity, townscapes and landscapes", this is not consistent with the statement in para. 9.19 which talks about absorption and mitigation, rather than protecting and enhancing. It is increasingly recognised that biodiversity needs to be protected, and that it is rarely possible to mitigate losses resulting from inappropriate development. It would be more consistent to modify the statement in para. 9.19 to be consistent with protection and enhancement, which is a theme supported in other areas of the

*Council's Initial Response*

**Agreed. Amendment to paragraph 9.19 to be consistent with para 9.31 and to reflect the differential between the impacts on local infrastructure and the viability of the Welsh language from the protection of the natural environment.**

*Action*

**Change to the Plan.**

**Paragraph Para 9.34**

*Representation(s)*

**3523 Ms Sally Bere [3602]**

**Object**

*Summary:*

Para. 9.34 "The LDP seeks to sustain and enhance existing communities" ADD: 'and their cherished built & natural environment' "whilst also creating new and sustainable developments." Reason: the planning system is the main delivery mechanism in protecting and enhancing existing fabric which is worthy of retention, including heritage assets, and the natural environment.

*Council's Initial Response*

**Disagree.**

**The wording in this paragraph is considered to be sufficiently robust and in accordance with PPW.**

*Action*

**No change to the Plan.**

**Paragraph Para 9.37**

*Representation(s)*

**3524 Ms Sally Bere [3602]**

**Object**

*Summary:*

Objection to Para. 9.37. The following change is sought:

"Allotments, cemeteries, urban green space," ADD 'including planned open space within existing development', green corridors" Reason, areas of planned open space are particularly targeted for redevelopment, may be privately owned , but still contribute to the streetscene & therefore quality of life.

*Council's Initial Response*

**Disagree. The proposed wording change does not create a manifest change to the intent of the Authority in this respect.GI 'asset' can be protected and enhanced. Open space within existing developments that are privately owned and are suitable for redevelopment cannot be protected as a GI assets outside of the GI requirements for new developments.**

*Action*

**No change to the Plan**

**Paragraph Para 9.41**

*Representation(s)*

**3472 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]**

**Support**

*Summary:*

We welcome the sentiment of paragraph 9.41. Where there is insufficient infrastructure capacity and development wishes to connect in advance of our AMP capital investment, planning obligations or a commercial agreement are the most appropriate way in ensuring delivery of necessary supporting infrastructure.

*Council's Initial Response*

**Support welcomed**

*Action*

**No change to the Plan.**

**Paragraph Para 9.45**

*Representation(s)*

**3473 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]**

**Support**

*Summary:*

We also welcome the inclusion of paragraph 9.45 - DCWW provide further commentary in respect of policy INF4 and Burry Inlet SPG - refer to rep 3493.

*Council's Initial Response*

**Support welcomed.**

**(For cross reference purposes the Council's response to representation reference number 3493 can be viewed under its responses to representations received on policy INF4).**

*Action*

**No change to the Plan.**

**Paragraph Para 9.51**

*Representation(s)*

**4470 Calon Cymru Network CIC (Dr Pat Racher) [5222]**

**Object**

*Summary:*

In 9.51, 'to reflect the needs of rural areas and the rural economy' is a key component, but in the view of Calon Cymru the planning framework should have a more proactive role in fostering ecologically sound agriculture and horticulture, to improve resilience in unstable, difficult times. This includes the services needed to provide, maintain and develop small-scale machinery and new technologies that alleviate the physical demands of traditional horticultural practice.

Calon Cymru welcomes the aim for an integrated transport network, and proposes a presumption in favour of electric vehicle charging points, to form a network to help the rural population switch from petrol and diesel vehicles to electric vehicles.

*Council's Initial Response*

**The revised LDP seeks to protect and enhance the natural environment, and the sustainable management of natural resources. However, in relation to the services needed to provide, maintain and develop small-scale machinery and new technologies that alleviate the physical demands of traditional horticultural practice - this falls outside the remit of the revised LDP.**

**In relation to the integrated transport network and Electric Vehicle Charging Points, the revised LDP promotes its use through Policy CCH2.**

*Action*

**No change to the Plan.**



**Representation(s)****4020 Dyfodol (J W Thomas) [563]****Support****Summary:**

Mae Dyfodol i'r laith yn croesawu'r cyfeiriadau at ddatblygiad gwledig, graddol a bod nodweddion ieithyddol a diwylliannol penodol y sir yn cael eu cydnabod. Rydym yn ofni y bydd y nodweddion unigryw hyn yn cael eu gwanhau'n ddifrifol os bydd 8,835 o dai yn cael eu hadeiladu rhwng nawr a 2033.

Mae Dyfodol yr laith yn credu bod swyddi a gwell seilwaith yw'r elfennau allweddol o ran cadw pobl ifanc yn y sir. Rydym yn gwybod bod cannoedd yn gadael bob blwyddyn i chwilio am waith yn rhywle arall. Mae cau siopau a ffatrïoedd yn ogystal ag ansicrwydd Brexit yn awgrymu mai datblygiad organig, graddol yw'r dull mwyaf realistig dros y 15 mlynedd nesaf.

Dyfodol i'r laith welcomes the references to gradual, rural development and the recognition of the county's distinct cultural and linguistic characteristic. It is this very distinctiveness which we fear may be seriously weakened if 8,835 houses are built between now and 2033.

Dyfodol i'r laith believes that jobs and a better infrastructure are the key elements to keeping young people in the county. We know that hundreds leave each year to seek work elsewhere. Factory and shop closures as well as Brexit uncertainty, suggest that gradual, organic development is the most realistic approach over the next 15 years.

**Council's Initial Response****Nodir y sylwadau.**

**Gellir cyfeirio at ymateb y Cyngor i sylwadau perthnasol eraill yn ymwneud â'r iaith Gymraeg - gan gynnwys cyfeirnodau rhif 4365 a 3849 (ymatebion y Cyngor at sylwadau ar Pennawd / Adran 8 y Cynllun).**

**Comments noted.**

**Reference can be made to the Council's response to other relevant representations in regards the Welsh language - including reference numbers 4365 and 3849 (Council's responses to comments on chapter / Section 8 of the Plan).**

**Action****Dim newid i'r Cynllun.****No change to the Plan.**

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## 10. The Clusters

### Paragraph 10. The Clusters

#### Representation(s)

**4209 Tata Steel Europe Limited ( \_ \_ \_ ) [5156] Object**

**Agent: Turley Associates Ltd (Abi Roberts) [4717]**

#### Summary:

Policy HOM1 allocates a relatively large number of sites within Llanelli, a number of which are on very small sites (under 10 units). Whilst not expressly seeking the exclusion of such smaller sites from the Plan, it is stated that this focus on smaller sites could impact negatively on delivery, and therefore additional larger sites should be allocated within the cluster in order to ensure a continued supply of new homes thereby supporting the Council's wider economic objectives. As a cross reference note - site based representations made by the respondent include the one that can be found under representation number 4191 (policy HOM1).

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#### Council's Initial Response

**Comments noted.**

**The Council is satisfied that the scale and location of the sites allocated across the cluster is appropriate. In noting the contribution of larger sites, the Council also recognises the importance of providing a range and mix of sites within the cluster. Such an approach will not only ensure a mix and choice of housing types is delivered but will also offer opportunities to a wider range of developers - ranging from national housebuilders to smaller scale companies.**

#### Action

**No change to the Plan.**

=====

#### Representation(s)

**4585 Ceredigion County Council (Anjuli Davies) [5303] Object**

#### Summary:

The Council supports the identification of Newcastle Emlyn and Llanybydder as Service Centres, and Cwmann, Pontyweli and Cenarth as Sustainable Villages. Cluster 4 - Teifi is closest to Ceredigion. There are 3 external links arrows identified at Newcastle Emlyn, Llandysul and Cwmann. External link arrows at all points where the transport network crosses between the two counties would be welcomed including at Llanybydder, Llanfihangel-ar-arth, Henllan and Cenarth.

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#### Council's Initial Response

**Noted. The identification of arrows on the Key Diagram reflect the importance of cross border connectivity, including key linkages. They are not intended to represent an exhaustive representation of all the transport networks between neighbouring authorities.**

#### Action

**No change to the Plan.**

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**Representation(s)**

**4206 Tata Steel Europe Limited ( \_ \_ \_ ) [5156] Support**

**Agent: Turley Associates Ltd (Abi Roberts) [4717]**

**Summary:**

The Spatial Strategy identifies a settlement hierarchy but sets it within a settlement framework grouped under six clusters. The proposed site is located within cluster 2 'Llanelli and the Southern Gwendraeth Area'. The RLDP (at paragraph 10.8) confirms that this cluster retains a strong developmental focus, with its regeneration potential recognised within the Transformations Strategy, City Deal and current Adopted LDP, along with the emerging Draft National Development Framework (October 2019) which identified Llanelli specifically as a 'national growth area'. Llanelli will provide the focus for delivery in this area, which is strongly supported by our client. As a cross reference note - site based representations made by the respondent include the one that can be found under representation number 4191 (policy HOM1).

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**Council's Initial Response**

**Comments noted/ support welcomed**

**Action**

**No change to the Plan.**

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**Paragraph Para 10.20**

**Representation(s)**

**4586 Ceredigion County Council (Anjuli Davies) [5303] Object**

**Summary:**

In addition to Llanysul, Lampeter and Cardigan, reference to the linkages between Adpar and Newcastle Emlyn would be welcomed here.

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**Council's Initial Response**

**Agree.**

**Reference to Adpar to added to paragraph 10.20. Note: Change to form a minor editorial amendment.**

**Action**

**Plan to be amended accordingly.**

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*Representation(s)*

**3142 Barton Willmore (Joe Ayoubkhani) [646] Support**

*Summary:*

We support Paragraph 10.20, where it is stated:  
"The close cross border relationship of the area to those communities in Ceredigion is noted, as is the role that settlements such as Llandysul, Lampeter and Cardigan play to the communities in this area. This relationship is recognised in various policy documents, and is a key consideration in the distribution and supply of homes within the Deposit LDP."

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*Council's Initial Response*

**Support is welcomed.**

*Action*

**No change to the Plan.**

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**Paragraph Para 10.22**

*Representation(s)*

**4587 Ceredigion County Council (Anjuli Davies) [5303] Object**

*Summary:*

The Council would welcome reference here to the fact that Newcastle Emlyn and Llanybydder are recognised as Urban and Rural Service Centres in the Ceredigion Local Development Plan 2007-2022.

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*Council's Initial Response*

**Agree. Amend paragraph 10.22 to include reference to the status of Newcastle Emlyn and Llanybydder in the Ceredigion Local Development Plan 2007-2022**

*Action*

**Plan to be amended accordingly.**

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## 11 Policies

### Paragraph 11 Policies

#### Representation(s)

**3810 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

**Summary:**

Seeking a new policy for rural allocations which fall outside the catchment of the public sewerage system we would advise that your Authority consider the allocation in its entirety utilising one private system as proliferation of private plants can cause environmental problems. This is a topic area that needs to be accounted for in the written statement given the dynamics of the county.

#### Council's Initial Response

**Agreed. The Council to provide new policy to address content of the representation**

#### Action

**Change to the plan (Focused Changes)**

#### Representation(s)

**4575 Carmarthenshire County Council (Mr Deryk Cundy) [2579] Object**

**Summary:**

In promoting a site for proposed new open space within the community, a specific site is identified in Bynea (see representation number 4576 - comment on chapter/section 11). In order for such a site to be identified, this would require the insertion of a new policy into the Plan that makes provision for new open space proposals at defined locations and depicted as such on the proposals map.

#### Council's Initial Response

**Comments noted.**

**It is not considered that there is requirement to introduce such a policy into the Plan. Proposals for open space / recreation developments can be considered on their merits at planning application stage. Reference is made to Policy PSD6 - Community Facilities.**

**Reference should also be made to the Council's response to representation reference number 4576 as part of its response to comments received on Chapter/Section 11 of the Plan.**

#### Action

**No change to the Plan.**

*Representation(s)*

**4576 Carmarthenshire County Council (Mr Deryk Cundy) [2579]**

**Object**

*Summary:*

With due regard to a previous candidate site submission (SR/086/017), the proponent seeks the identification of a new open space proposals and depicted as such on the proposals map. Reference should also be made to representation 4575 under chapter/section 11 of the Plan. The land is in the heart of Bynea and easy to access from the village but also is linked to the footpath network that links many of the new housing estates it is for instance only 1,000 yards from the Genwen Development not a long walk and something that may be able to be supported by some of the open space S106 monies attached to that project. This is part of a larger overall plan where there are a string of recreational areas and play parks that can be used for the benefit of the residents linking through to our footpaths making them accessible for Actif Travel and safe areas for children to play. Currently there are play parks / open spaces in or near the Bynea Ward as follows: Bryn Play Park, Yspitty Road Play Park, Berwick Road Play Park, Propose Recreational Area in Bynea (Gwndwn Mawr), Proposed Play Park in Penygraig (To Be Refurbished if Confirmed with S106 Officer) and Play Park in Dylan (Llwynhendy (Bynea Ward)). All of these parks can be walked to along safe routes for children and parents throughout the Ward. These are there to supplement the open spaces for the Rugby Club, the Field opposite Bynea school etc for official recreation. I hope this shows the plan behind the request which is supported by the local community and has financial support for the future. It is noted that the Bynea District Forum is in support of this proposal. This is an objection to chapter 11 in that the site is not identified as proposed new open space. Site reference is ALT/086/017.

*Council's Initial Response*

**Comments noted.**

**Reference is made to site's previous assessment under the site assessment table under site reference SR/086/017. This representation, whilst on the same site area, seeks a different use in that it is a request for the whole site to be shown on the proposals map as a site for new open space. It therefore requires a further assessment.**

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The site does not accord with Stage 2a - Initial Detailed Site Assessment (the site cannot accommodate 5 dwellings in that it is not a residential proposal here).**

**The uses raised by the respondent can be considered against the Plan's policy framework if and when a future proposal comes forward. Furthermore, the land is not being promoted directly for such uses by the County Council's Estates Dept.**

**Reference is made to the Council's response to representation reference number 4575 as part of its response to comments received on Chapter/Section 11 of the Plan.**

**The site will not be identified on the proposals map, however any future proposal can be considered on its merits against the Plan's policy framework.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3536 Ms Sally Bere [3602]**

**Object**

*Summary:*

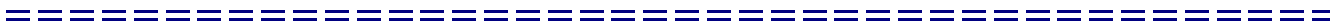
New policy requested to provide guidance on the "Provision of New Green Infrastructure within Existing Development", , particularly applicable perhaps, to town centres. This would complement PSD8 the Provision of New Open Space. Subject to existing development having an appropriate remaining design life, the introduction of selected areas of green infrastructure such as living walls, green roofs etc should be considered as a viable, more sustainable, less costly & less depressing alternative to knocking down & redeveloping sections of our town centres every 30 years.

*Council's Initial Response*

**Disagree. The plan makes a commitment to expand its provision of GI in new and existing spaces. Specific reference is made to SP11, PSD3, PSD2.**

*Action*

**No change to the Plan**



*Representation(s)*

**3534 Ms Sally Bere [3602]**

**Object**

*Summary:*

New policy requested be used to protect rights of way corridors beyond the bare legal requirement.

Planning policy should also be used to protect rights of way corridors beyond the bare legal requirement. This should be reflected in a NEW POLICY , as well as being referenced in supporting paragraphs. This is important in built up areas where fencing on both sides of a right of way leads to loss of amenity & encourages anti social behaviour. Loss of amenity is also a factor when rights of way, especially those which form part of the strategic rights of way network are replaced by estate roads in development proposals. In these cases the access corridor and its setting should be safeguarded.

*Council's Initial Response*

**Disagree.**

**The protection of and provisions relating to the rights of way network are adequately covered through legislation.**

**The impact of development on a PROW is adequately considered under Policy TRA2 and whilst not seeking to protect PROW actively supports proposals which enhance provision as well as encouraging permeable, legible, direct, convenient, attractive and safe walking routes. In addition, criterion c of Policy PSD1: Sustainable and High Quality Design requires new developments to provide high-quality design solutions which deliver solutions in relation to buildings and spaces and their interrelationships, and delivers an effective, safe and inclusive site layout. Criterion f) vi. Seeks delivery of safe and efficient connections to existing access networks including active travel.**

**Reference should also be made to the provisions of the Rights of Way Improvement Plan (RoWIP) for Carmarthenshire, and the interrelationship of the Plan area's footpaths, bridleways and bye-ways**

*Action*

**No change to the plan.**





*Representation(s)*

**3888 Welsh Government (Mr Mark Newey) [13]**

**Object**

*Summary:*

Category C - Safeguarding of Employment Sites

The strategic sites identified in Carmarthenshire through the two-county summary report are considered to offer strategic benefits and should be protected. The 6 strategic sites and all other existing employment areas identified on the Proposals Map should be clearly listed in a separate safeguarding policy. The DPM identifies that safeguarded sites should be protected for a range of B-Class uses.

*Council's Initial Response*

**Disagree.**

**Whilst provisions of the Development Plan Manual Ed.3 are noted it is considered that the delineation of the sites as 'existing' employment on the proposals map along with the provisions of Policy EME1: Employment - Safeguarding of Employment Sites offer sufficient clarity and appropriate protection for a range of B class uses as required.**

**It should be noted the reference made by the respondent to 6 strategic sites relates to their inclusion within the part of the LDP evidence base. The Plan itself identifies only two Strategic Sites under policy SP6. The 6 sites referred to by the respondent are allocated within the Plan as either employment or mixed use.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3138 Mr Alan Martin [2386]**

**Object**

*Summary:*

Regarding the draft LDP. I wish to lodge a general objection under e mail as I was informed I could.

I refer to the large scale proposals, particularly around CARMARTHEN, as well as numerous villages, such as HENDY, TYCROES and others, where the proposals involve the loss of grade 1 farming land. I have no objection to brownfield, small infill, or poor quality land.

If we are faced with rising sea levels and we are going to sacrifice land to the sea, then available land for living and growing crops will get less as competition for space increases. Also, these lands provide us with oxygen and the habitats for birds and so forth, that form the ecological and life trail.

We have also declared a climate emergency, where we need trees for oxygen, habitat, etc, while trying to reduce vehicles and emissions.

We should strive to develop brown field, or integrate housing onto industrial estates, where possible.

*Council's Initial Response*

**Disagree.**

**The Revised LDP and its strategy seeks to support the distribution of growth which is of a scale and nature appropriate to the hierarchy and that settlement. In this respect the LDP seeks to ensure that development is appropriate to the settlement and reflective of its ability to accommodate growth and the services and facilities available.**

**The Plan has full regard to the implications arising from flood risk. The preparation of the Plan is informed by the Sustainability Appraisal (including the Strategic Environmental Assessment) as well as the Habitat Regulations Assessment.**

**The Plan reflects the declaration of a Climate Change Emergency both by the Welsh Government and the Council and includes a series of policies and proposals.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3333 Mrs DPA Bonnell [519]**

**Object**

*Summary:*

We have no quarrel with the soundness of the plan as it stands but wish to appeal against its extreme inflexibility in the face of urgent extenuating circumstances. I am the owner and sole manager of Swiss Valley Garden Centre and it is impossible for me to continue trading beyond the next few months. Despite considerable efforts over the last 10 years it has proven impossible to find a buyer to take on the business as a going concern as small garden centres are simply not profitable in the face of the big chains who's define themselves as "Destination Centres" making most of their living from cafes and general shopping. Imminent closure is inevitable - staff down to 1. Building and land falling into despair and becoming an eye-sore. Meetings with the Head of Planning and local Assembly Members and the potential for housing on the site are cited (2-3 units). Please, could we consider cutting through some of this red tape. Objection against Chapter 11 in that it is interpreted that the respondent seeks the inclusion of a new policy to allow for redevelopment in such instances.

*Council's Initial Response*

**Reference is made to the previous assessment of a candidate site seeking residential / inclusion within the development limits (SR/086/026). The candidate site was dismissed at Stage 1 of the Site Assessment as it is not compatible against the location of future growth presented in the Preferred Strategy (refer to Sites Assessment Table). It is stated within the Assessment that the site does not comply with the provisions of the Preferred Strategy as it is divorced from the settlement and would result in development in the open countryside.**

**It is interpreted from this deposit Plan representation that the respondent is seeking the inclusion of a new policy in the Plan that would allow for the consideration of cases such as that outlined in the summary above on a case by case basis. This is not the same as making a site based representation, or specifically questioning the outcomes of the candidate site assessment previously undertaken by the Council.**

**This 'new' representation is not being assessed against the site assessment methodology as it is not site based, albeit it does have a spatial dimension. As such, this representation is asking a different question to the site based representation previously made at candidate site stage.**

**The Council does not consider that there is a requirement for a new policy in the Plan, however with reference to the respondent's specific situation / concerns - it should be noted that whilst any proposal will be considered against the policies and provision of the relevant Local Development Plan, due regard may be given (where appropriate) by the Local Planning Authority to other material planning considerations (for example national policy).**

*Action*

**No change to the Plan.**



*Representation(s)*

**3135 Mr KP Morse [4853]**

**Object**

*Summary:*

As an ex soldier and civil servant this County Council is deliberately out to destroy the beauty of this County. The Plan should be rejected and not allowed to proceed.

- 1. Increase in traffic
- 2. No Employment
- 3. Tourism will be affected
- 4. Llandovery Borders the Brecon Beacons National Park Ordnance Survey Map will confirm this
- 5. This council's activities to allow such decimation of the area needs by the secretary of state for the environment and communities to be investigated and rejected.
- 6. Sewerage system would be overloaded.

*Council's Initial Response*

**Disagree.**

**The Plan has been prepared in accordance with national planning policy and full regard has been given to all the matters raised in the objection.**

**The Plan is supported by evidence in relation to infrastructure. In addition, the allocation of any sites for development has been undertaken in accordance with the site assessment methodology which has regards to highways implications. The status of Llandovery (bordering the Brecon Beacons National Park) is recognised and any developments that may have an impact upon the national park will be considered accordingly. It is also noted that employment provision has been fully considered and a range of employment allocations and policies have been included within the Plan.**

*Action*

**No change to the Plan.**



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**Representation(s)****4580 Ffynnone Community Resilience (R Gillam) [5302]****Object****Summary:**

We were set up to build resilience locally, address and prepare for emergencies and challenges including the climate crisis and the exit from fossil fuels. We have members in Carmarthenshire, Pembrokeshire and Ceredigion. The issue on which we have gathered evidence is relevant everywhere. We would like to draw your attention to the need for greater food security locally and ask that furthering local food resilience be central to the new Local Development Plan. Recently Covid-19 exposed the fragility of our current supply chains: these minor glitches in supply are just a glimpse of the effects climate change will very soon have on food on the supermarket shelves. We recently held an online meeting, where over 70 people attended to share their concerns and ideas with regards to increasing our resilience to the coming shocks. We heard that the community is very concerned about the local and national food crisis. Please find attached collated notes on discussions around food at the meeting. We have conducted a survey locally and the results strongly support our case, please see the short summary attached. 62 respondents told us that local residents need access to grow their own food but do not currently have this, that growing your own provides financial security, and mental and social wellbeing. Respondents state the need for community growing land to be near to homes. We would like the County Council to allocate land for the purpose of community growing adjacent to every village in the County. This is a zero cost but effective way of enabling communities to take control of their food security. Allocating land to community growing is in line with the Wellbeing of Future Generations act. It will bring us closer to all 7 goals: global responsibility by reducing imports and packaging, prosperity by retaining more money locally, increasing resilience to supply chain failure, enabling healthy activity outdoors and healthy food, increasing equality for those currently unable to afford to buy healthy food and with no access to land, encouraging a community working with each other towards common goals, reinvigorating our culture and connection with the land which has always sustained us. In taking this step the County Council will be planning long term, supporting other public bodies such as the health boards, involving and collaborating with the community, and preventing the growing problems of poor physical and mental wellbeing. This is a request for a new policy in the Plan (land for Community Growing).

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*Council's Initial Response*

**Agreed in part.**

**The Plan does not preclude the provision of community growing and the provision of such facilities would be considered against the policies of the Plan. In this respect reference is made to the provisions made for Green infrastructure and Placemaking. Whilst it is not considered necessary to include a specific policy it is noted that the Plan should make more specific reference to community growing.**

**Reference is had to the Covid-19 Assessment which forms part of the plan documents. The Plan will where appropriate be developed to respond to any emerging evidence/strategies in relation to the impacts arising from Covid and the Welsh Government and the Councils recovery plans.**

**The Plan includes a range of policies and provisions in relation to contributing and addressing the challenges of climate change from a land use planning perspective. In this respect it has been prepared with regard to the provisions of PPW and other plans and strategies including the climate change emergencies as declared by the WG and the Council.**

*Action*

**Amend the Plan to include reference to 'community growing spaces'.**

*Representation(s)*

**3541 Ms Sally Bere [3602] Object**

*Summary:*

NEW POLICY REQUESTED. With regards to the archaeological resource, the wording of policy SP14 and its supporting text is therefore confused and confusing and there needs to be a separate policy statement relating to archaeology to clarify this & to add detail to the provisions of TAN 24.

*Council's Initial Response*

**Disagree.**

**Matters in relation to archaeology are adequately considered through national Planning Policy in the form of PPW and Technical Advice Note 24: The Historic Environment. The Plan does not seek to unnecessarily repeat matters contained within national policy and primary legislation.**

**Note a Supplementary Planning Guidance will be prepared as appropriate and where required with regard to the Historic and Built Environment.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4370 Cwm Environment Ltd (Sean Gallagher) [5039] Object**

**Agent: Asbri Planning Ltd (Mr Keith Warren) [592]**

*Summary:*

In objecting to the identification of Nantycaws waste site under Policy SG2 Reserve Sites, the respondent seeks the identification of the site as a waste allocation on the proposals map, including the extension of the site to include additional land (to that already identified in the current LDP).

N.B This will have to be achieved through the inclusion of a new policy in the Revised LDP (refer also to Representation 3996).

*Council's Initial Response*

**Agreed in part.**

**The site including the waste management components will form part of a mixed use development aimed at delivering a strategic opportunity for waste management, energy from waste, and related employment based activities. The Council will be working with the respondent and CWM Environmental Ltd specifically, as well as infrastructure providers, to ensure the site's delivery and its timing is robustly**

*Action*

**Remove Nantycaws waste management site from Policy SG2: Reserve Sites and place into Policy SG1: Regeneration and Mixed Use Sites. Revise the site area on the Proposals Map to reflect the respondent's representation.**

*Representation(s)*

**4079 Neath Port Talbot County Borough Council (Rachel Jordan) [5136] Support**

*Summary:*

After reviewing the document and supporting information, Neath Port Talbot Council is generally supportive of Carmarthenshire's Plan and approach taken. We look forward to continuing to work collaboratively with you on cross boundary and regional issues as your plans proceeds and work begins on the Neath Port Talbot Replacement Plan.

*Council's Initial Response*

**Support welcomed.**

**The Council particularly welcomes the emphasis on collaborative working.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3555 Mineral Products Association Wales (Mr Nick Horsley) [3778] Support**

*Summary:*

Support for the positive wording of the majority of policies:

We welcome the fact that the majority of policies are positively worded, i.e. "development will be permitted where it..."

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3320 Carmarthen Civic Society (Huw Iorwerth) [207] Support**

*Summary:*

The Carmarthen Civic Society supports the planning principles set out in the revised plan, especially those relating to the protection and enhancement of the built and historic environment, the protection of open space and the green infrastructure. The Society welcomes the Council's proposal to prepare Special Planning Guidance and Development Briefs throughout the plan period. We consider this to be particularly important in respect of key areas such as the historic core of Carmarthen town, so as to ensure that plan policies are fully understood and are made relevant and specific to such areas. We consider this will be of great assistance to developers in ensuring that planning policies are properly interpreted.

*Council's Initial Response*

**Support is welcomed.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4577 National Grid Company plc. (Avison Young) [4746] Support**

*Summary:*

National Grid has no comments to make in response to this consultation.

*Council's Initial Response*

**Noted.**

*Action*

**No change to the Plan.**



## Policy Strategic Policy - SP 1: Strategic Growth

### Representation(s)

**3634 - - John Roberts Family Trust [5018]**

**Object**

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

#### Summary:

The Preferred Strategic Growth Option of providing a housing requirement of 8,835 new homes which results in Policy SP1 identifying a supply of 10,160 new homes is objected to as it would result in the Plan failing the tests of soundness in that it does not fit (by not having regard to national policy and being inconsistent with regional plans) and is not appropriate (by not enabling the delivery of a strategy that is positive and aspirational). By comparison, the growth identified in Policy SP1 would result in a decrease of 6,392 homes when compared with the existing adopted LDP.

**3618 Union Tavern Estate [3913]**

**Object**

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

#### Summary:

The Preferred Strategic Growth Option of providing a housing requirement of 8,835 new homes which results in Policy SP1 identifying a supply of 10,160 new homes is objected to as it would result in the Plan failing the tests of soundness in that it does not fit (by not having regard to national policy and being inconsistent with regional plans) and is not appropriate (by not enabling the delivery of a strategy that is positive and aspirational). By comparison, the growth identified in Policy SP1 would result in a decrease of 6,392 homes when compared with the existing adopted LDP.

**3816 Lightwood Planning (Mr Richard Walker) [5065]**

**Object**

#### Summary:

We conclude that the proposed requirement is far too low. At the very least it should be 10,065 homes (baseline), With a 15% uplift for flexibility generating a supply figure of 11,575 homes. This generates a need for another 1,415 homes.

We would also say that we are not convinced that a baseline requirement of 14,090 homes and 632 jobs per annum is 'undeliverable' in terms of housing or employment growth. It is not unsustainable socio-economically.

*Council's Initial Response*

**The Population and Household Projection Topic Paper and the evidence contained within the Demographic Forecasts undertaken by Edge Analytics (2018 and 2019) sets out the informing considerations and the justification for the population and household projections for the County.**

**In assessing and identifying the housing requirement for the Plan and in accordance with PPW 10 Para 4.2.6 the WG local authority level projections were utilised as a starting point. Edge Analytics sought to review and assess the appropriateness of the latest WG population and household projections for Carmarthenshire and sought to also provide an alternative suite of demographic and trend evidence to consider.**

**The Council considers that an appropriate and deliverable housing requirement within the deposit Revised LDP factors in the ability to meet the strategic objectives and policies of the Council, retains the young within the county, delivers for the needs of all our communities both urban and rural, and provides the opportunity for job creation, amongst others.**

**Policy SP1 identifies that in meeting the overall requirement of 8,835 dwellings during the plan period, the housing supply is set at 10,160 dwellings (15% general flexibility above the requirement). Some 6,986 residential units will be provided through allocations and those sites considered to be existing commitments. The remainder of the housing requirement will be met through allowances for large and small windfall sites recognising their contribution to housing delivery across the plan area.**

**Consideration will be given as appropriate to the need to amend or update relevant background /topic papers or evidence prior to submission.**

*Action*

**No change to the Plan**



*Representation(s)***4030 Dyfodol (J W Thomas) [563]****Object***Summary:*

Mae gan Dyfodol i'r laith amheumon ynghylch nifer y tai a allai gael eu hadeiladu yng nghefnwlad Llanelli/Abertawe. Yn rhy aml anghofir bod gan Gwm Gwendraeth a Dyffryn Aman nifer sylweddol o siaradwyr Cymraeg. Fodd bynnag, rydym yn credu bod amcangyfrif Llywodraeth Cymru yn llawer mwy realistig o ystyried yr hinsawdd economaidd bresennol. Mae angen arnom darged tai realistig. Mae angen swyddi arnom ar gyfer ein pobl ifanc a thai cymdeithasol a fforddiadwy ar gyfer y bobl yn y sir. Dylai mynd i'r afael â'r broblem o ran tai gwag ddarparu llety ar gyfer pobl leol sy'n chwilio am swyddi. Mae cynyddu'n raddol nifer y tai sy'n cael eu hadeiladu hefyd yn ddymunol, a hynny yn ddelfrydol gan gwmnïau lleol. Mae cynnydd mewn pobl ddi-Gymraeg nid yn unig yn gwanhau ein diwylliant unigryw, ond mae hefyd yn ychwanegu at y problemau sydd eisoes yn wynebu ein sector cymdeithasol a gofal iechyd, gan fod nifer o'r mewnfudwyr yn oedrannus.

Dyfodol i'r laith has reservations about the number of houses that may be built in the Llanelli/Swansea hinterland. It is too often forgotten that the Gwendraeth and Aman valleys have significant numbers of Welsh speakers. However, we think that the Welsh Government's estimate is far more realistic given the current economic climate. We need a realistic housing target. We need jobs for our youngsters and both social and affordable homes for the people of the county. Tackling the empty houses problem should provide accommodation for local people seeking employment. A gradual increase in house building, ideally by local firms is also desirable. An influx of non Welsh speakers not only weakens our unique culture, but adds to the stresses already faced by our social and health care sector, as many of the in migrants are elderly.

***Council's Initial Response***

**Nodir y sylwadau.**

**Cafodd Strategaeth y Cynllun a'i ddull cynaliadwy o ddarparu tai newydd ei seilio ar egwyddorion datblygu cynaliadwy ac yn unol â darpariaethau'r polisi cynllunio cenedlaethol. Mae'r ffigur gofyniad tai ar gyfer y Sir yn seiliedig ar amcanestyniad 10 mlynedd o Dwf y Boblogaeth y mae tystiolaeth gadarn ohono - fodd bynnag, adolygir hyn cyn Archwilio'r Cynllun.**

**Mae'r safleoedd hynny a ddyrannwyd yn y CDLI at ddibenion preswyl wedi cael eu hystyried yn llawn trwy'r fethodoleg asesu safleoedd. Fel rhan o'r broses asesu hon, paratowyd ffurflen safle.**

**O ran dosbarthiad gofodol, mae'r Cynllun yn destun Arfarniad Cynaliadwyedd/Asesiad Amgylcheddol Strategol, a hefyd yn cael ei gefnogi gan Asesiad o'r Effaith ar y Gymraeg (Rhagfyr 2019).**

**Comments noted.**

**The Plan's Strategy and its sustainable approach to the provision of new homes has been formulated on the basis of sustainable development principles and in accordance with the provisions of national planning policy. The housing requirement figure for the County is based on the Population Growth (PG) - 10yr projection scenario which is robustly evidenced - however this will be reviewed ahead of the Examination of the Plan.**

**Those sites allocated within the LDP for residential purposes have been subject to full consideration in accordance with the site assessment methodology. As part of this assessment process a site pro forma has been prepared.**

**In terms of spatial distribution, the Plan is subject to Sustainability Appraisal / Strategic Environmental Assessment, whilst it is also supported by a Welsh Language Impact Assessment (December 2019).**

***Action***

**Dim newid i'r Cynllun.**

**No change to the Plan.**



**Representation(s)****4270 - RSAI - [4993]****Object****Agent: Lichfields (Mr Arwel Evans) [3166]****Summary:**

We are generally concerned that the LPA has allocated sites without the robust evidence that is required by PPW and the Development Plan Manual to demonstrate that the sites are deliverable from a technical and financial perspective. This includes a number of Council owned sites and the Council should be transparent about the timetable for delivery of its own sites. A series of specific and clear objections to allocated sites have been lodged as representations and 1 to a reserve site. We consider that the Deposit Plan fails Test of Soundness 3 (Will the Plan Deliver). Not delivering enough housing will have huge consequential impacts on the Council's ability to attract new jobs to the area as the LDP aspires to do. Other sites put forward as part of the LDP process have better prospects of being delivered and written evidence has been provided of this. Reference is made to the client's site in this regard - see rep 4243.

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*Council's Initial Response*

**Comments noted.**

**The Council is confident in the deliverability of those sites allocated. Their allocation has been subject to full consideration through the site assessment methodology. As part of this assessment process, site pro formas are prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal.**

**Where relevant, the Council has prepared responses to representations made to the deposit Plan on allocated sites (most notably but not exclusively under the responses to comments received under policy HOM1- Housing Allocations).**

**Where appropriate however, the Council can respond to deliverability concerns that emerge by way of focused changes.**

**The Council will ensure that sufficient evidence is provided by landowners/developers to prove that these sites are able to be delivered within the Plan period. Where appropriate, further evidential work can be undertaken prior to the examination in to the revised LDP.**

**The Council takes a proactive approach to the deliverability of such sites and continues to engage with landowners/proponents -notably within the context of the content of Planning Policy Wales and the LDP Manual (edition 3).**

**Council owned sites are not treated differently in regards the expectations placed upon them in terms of on delivery.**

**In regards reserve sites, their need will be closely monitored through take up of allocated sites as part of the monitoring framework of this Plan and reported through the Annual Monitoring Report arrangements.**

**As a cross reference note, the Council's response to the promotion of the client's site under representation reference number 4243 can be viewed under the Council's responses to comments received under policy HOM1. Also, the Council's response to the concerns raised in respect of other allocations are responded under the appropriate policy headings - most notably but not exclusively HOM1- Housing allocations.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4487 Cllr Tina Higgins [2920]**

**Object**

*Summary:*

Tycroes Primary School is full to capacity. There is room for a small extension, however any further building would impede on the school play areas. Provision of education to extra children is a real concern.

*Council's Initial Response*

**Noted. As part of the Plan's preparatory process close liaison is undertaken with other infrastructure and service provider to ensure its policies and provisions are both deliverable and/or are able to be accommodated through future investments/improvement programmes, including education.**

**It should be note the Plan also makes provision for educational improvements as part of the developer contributions secured through Planning Obligations, whereby financial contributions maybe sought where justified.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3143 Barton Willmore (Joe Ayoubkhani) [646]**

**Object**

*Summary:*

SP1 Strategic Growth - Object

In summary, for the reasons outlined, the housing requirement set in SP 1: Strategic Growth and SP 3: Providing New Homes is objected to and a housing requirement in line with the existing adopted LDP should be utilised.

- 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;
- 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;
- 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.

*Council's Initial Response*

**Disagree. The Population and Household Projection Topic Paper and the evidence contained within the Demographic Forecasts undertaken by Edge Analytics (2018 and 2019) sets out the informing considerations and the justification for the population and household projections for the County.**

**In assessing and identifying the housing requirement for the Plan and in accordance with PPW 10 Para 4.2.6 the WG local authority level projections were utilised as a starting point. Edge Analytics sought to review and assess the appropriateness of the latest WG population and household projections for Carmarthenshire and sought to also provide an alternative suite of demographic and trend evidence to consider. The Council considers that an appropriate and deliverable housing requirement within the deposit Revised LDP factors in the ability to meet the strategic objectives and policies of the Council, retains the young within the county, delivers for the needs of all our communities both urban and rural, and provides the opportunity for job creation, amongst others.**

**Policy SP1 identifies that in meeting the overall requirement of 8,835 dwellings during the plan period, the housing supply is set at 10,160 dwellings (15% general flexibility above the requirement). Some 6,986 residential units will be provided through allocations and those sites considered to be existing commitments. The remainder of the housing requirement will be met through allowances for large and small windfall sites recognising their contribution to housing delivery across the plan area.**

**Consideration will be given as appropriate to the need to amend or update relevant background /topic papers or evidence prior to submission.**

*Action*

**No change to the Plan**





*Representation(s)*

**3937 Pegasus Group (Daniel Millward) [5095]**

**Object**

*Summary:*

Objection to Policy SP1 - Strategic Growth.

We are not convinced the distribution of housing has been properly justified in the context of the ambition to deliver higher levels of economic growth. Our principal concern is that the ambitions to deliver economic growth will be jeopardised by the balanced approach to distributing growth across the county.

Policy SP1 needs to clearly justify the overall quantum of development to be delivered at each settlement tier and then explain how it will be distributed to support the economic aspirations of the plan, alongside its sustainability and community aspirations. Its failure to do so at present is a significant deficiency with the plan that needs to be addressed.

*Council's Initial Response*

**Noted. The respondent notes the level of evidence available in support of the sustainable distribution of housing and economic growth. The council recognises that further information will be required in order to ensure that some of the matters raised are sufficiently clear. Further background evidence will be provided leading into examination.**

**It should however be noted that the LDP is prepared within the context of other plans and strategies including those of the authority, whereby the need to reflect and support rural communities is recognised. Consequently, the Plan provides a balanced approach which recognises and has full regard to national policy provisions in relation to the sustainable location of development, whilst also acknowledging and reflecting the needs of rural communities.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4195 Tata Steel Europe Limited ( \_ \_ \_ ) [5156]**

**Object**

**Agent: Turley Associates Ltd (Abi Roberts) [4717]**

*Summary:*

There is a clear need for the Council to re-visit the selection of its planned level of housing provision and adopt a more positive albeit reasonable position which aligns more closely with its own evidence base and the higher resultant housing requirement it suggests. As a cross reference note - site based representations made by the respondent include the one that can be found under representation number 4191 (policy HOM1).

*Council's Initial Response*

**Disagree. The Population and Household Projection Topic Paper and the evidence contained within the Demographic Forecasts undertaken by Edge Analytics (2018 and 2019) sets out the informing considerations and the justification for the population and household projections for the County.**

**In assessing and identifying the housing requirement for the Plan and in accordance with PPW 10 Para 4.2.6 the WG local authority level projections were utilised as a starting point. Edge Analytics sought to review and assess the appropriateness of the latest WG population and household projections for Carmarthenshire and sought to also provide an alternative suite of demographic and trend evidence to consider. The Council considers that an appropriate and deliverable housing requirement within the deposit Revised LDP factors in the ability to meet the strategic objectives and policies of the Council, retains the young within the county, delivers for the needs of all our communities both urban and rural, and provides the opportunity for job creation, amongst others.**

**Policy SP1 identifies that in meeting the overall requirement of 8,835 dwellings during the plan period, the housing supply is set at 10,160 dwellings (15% general flexibility above the requirement). Some 6,986 residential units will be provided through allocations and those sites considered to be existing commitments. The remainder of the housing requirement will be met through allowances for large and small windfall sites recognising their contribution to housing delivery across the plan area.**

**Consideration will be given as appropriate to the need to amend or update relevant background /topic papers or evidence prior to submission.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4588 Ceredigion County Council (Anjuli Davies) [5303]**

**Object**

*Summary:*

See previous comments relating to Ceredigion Council's concerns regarding the level of growth proposed: Whilst Ceredigion County Council supports the ambitious the level of housing growth proposed, the Council are concerns that it may not be easily absorbed by parts of the County, particularly the settlements along the Teifi Valley.

*Council's Initial Response*

**Comments are noted. The LDP is prepared within the context of other plans and strategies including those of the authority, whereby the need to reflect and support rural communities is recognised. Consequently, the Plan provides a balanced approach which recognises and has full regard to national policy provisions in relation to the sustainable location of development, whilst also acknowledging and reflecting the needs of rural communities.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3580 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Support**

*Summary:*

NRW provide an analysis of the allocations and there are no objections, other than 1 site (see rep 3581). NRW have confirmed that this analysis can be logged and responded to within the LDP Infrastructure Assessment with regards to all regeneration and mixed use sites comments they make, other than this 1 specific objection site (see rep 3581)

*Council's Initial Response*

**Comments noted.**

**The Infrastructure Assessment will be prepared / updated by the Council.**

**Reference should be made to the Council's response to representation reference number 3581 (policy SG1 - site Prc2/mu2).**

*Action*

**No change to the Plan.**

*Representation(s)*

**3253 Matthew Utting [2833]**

**Support**

*Summary:*

Strategic Policy SP1 reflects the LDP's preferred Strategic Growth and Spatial Options, confirming inter alia provision of 10,160 new dwellings to meet a requirement of 8,835 new dwellings over the LDP period, 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 represents a sustainable and optimistic, though not unrealistic strategy geared towards encouraging and delivering new housing in the County over the LDP period.

*Council's Initial Response*

**Support Welcomed.**

**Consideration will be given as appropriate to the need to amend or update relevant background /topic papers or evidence prior to submission.**

*Action*

**No change to the Plan**

*Representation(s)*

**4199 Tata Steel Europe Limited ( \_ \_ \_ ) [5156]**

**Support**

**Agent: Turley Associates Ltd (Abi Roberts) [4717]**

*Summary:*

The RLDP recognises and references the emerging National Development Framework (NDF). This is currently only in draft form, as the Council notes, but there is nonetheless evidence that the Council has had appropriate regard to its emerging content, including specifically the "Outcomes" specified in the draft NDF. The Council's evidence references the Welsh Government estimates, contained in the draft NDF, of a need for some 23,400 homes across the Mid and West Wales region by 2038. It suggests that 'apportioning this regional housing requirement based upon population distribution, would allocate approximately 5,000 of these 23,400 homes to Carmarthenshire'. It is evident that the RLDP proposes a level of housing provision which exceeds this share. This approach is strongly supported where it is recognised that the figures presented in the draft NDF are simply derived from the Welsh Government published "Estimates of housing need in Wales" which, should be viewed as a baseline or starting point indicator of need and not a target or ceiling. As a cross reference note - site based representations made by the respondent include the one that can be found under representation number 4191 (policy HOM1).

*Council's Initial Response*

**Support Welcomed.**

*Action*

**No change to the Plan**

## Policy SG1: Regeneration and Mixed Use Sites

### *Representation(s)*

**4427 Development Services (Mr Huw Woodford-Rott) [772]**

**Object**

#### *Summary:*

With due regard to a previous candidate site submission (site SR/086/008), the proponent now seeks to clarify the overall site area and proposed uses. For clarity, this is being treated as a new site however many of its facets will have been reviewed previously as part of the Council's assessment candidate site SR/086/008. This is a mixed use proposal consisting of affordable homes, bungalows for older persons, town houses, 2 and 3 bedroom houses, 4 bedroom houses on appropriate plots, new school and road improvements and flood control. Reference is made to up to 250 dwellings and it is stated that value could be released to implement road improvements in the vicinity. Reference is also made to Western Power Distribution investment in the area. Further information is submitted with regards a retirement village as part of the mixed use proposal - information on infrastructure and road improvements again provided. Further thought on designating this area as a Primary Care Centre being the facilities that will be there all within a 2.5 mile radius of the Llanelli wards and Prince Philip Hospital the last area can accommodate 18 Affordable homes 54 Older Person homes and a Community Centre set in the remaining 1.25 acres. All with views across and down the valley. Perhaps this project can over the Plan Period gain the grants. Also, WPD have now agreed to construct a new Elect Sub Station approx 4m from the hedgerow and 17m from the existing Sub Station and will not encroach on any future roadworks. As many of their U/G cables within Parc Brynmawr are in private land they have decided to lay new cables in the verge and Lon Dderwen and the estate public roads. It has taken two and a half years for them to come to this conclusion and probably the same time to complete the works. Reference should also be made to file SR/086/008 where a host of material was previously submitted. This is an objection to policy SG1 as this site is not allocated for a mix of uses, the site reference is AS/086/088.

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*Council's Initial Response*

Reference can be made to the previous assessment of candidate site SR/086/008 which will be of relevance, however a new assessment is required as this is a new site area proposed in the objection site.

This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The site does not accord with Stage 2 (Phase 2b) of the Site Assessment Methodology for the following reasons: development of the site be contrary to general planning principles in that wider changes have been made to the development limits at this location following the removal of current LDP site GA2/h24 as a residential allocation. There are also concerns at a lack of evidence in terms of deliverability / viability, whilst a proposal of this scale would raise concerns in regards a detrimental impact on the character and setting of the settlement or its features.

Also, the nature of the highway infrastructure is a notable developmental consideration in this part of Llanelli. Whilst reference is made by the respondent to highway investment, there is no confirmation of funding or a delivery Plan in place in this regard within the Plan period.

Also, there is sufficient and more suitable land available for residential development within the settlement to accommodate its housing need.

Any proposed school could be a matter for determination against the policy framework of the Plan, as would any affordable housing exception site proposal or indeed any care related facility.

*Action*

**No change to the Plan.**



*Representation(s)*

**4530 JCR Planning Ltd (Mr Craig Jones) [4665]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

The inclusion of this site within the development limits for Llanelli would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a low carbon integrated development. Its development would be in keeping and in character with the settlement and will ensure a potential Education/research/employment opportunity. Part of the site is subject of a permission for a solar park, which will provide the necessary low carbon energy for this development. In addition, the proposed development at this location:- \* would not be detrimental to the amenity of adjacent properties; \* would satisfy recognised sustainability objectives; \* would not have a detrimental impact on the landscape or nature conservation interests. Furthermore, the site's delivery, if allocated, is assured. The agent confirms by way of follow up that that the land is owed by a Trust whose remit is one of education and research within a commercial setting. Ideally, our client would like it to be allocated for a mixed use, which would include the generation of low carbon energy. A mixed use SG1 allocation would be appropriate if employment would also be included. This is an objection against Policy SG1 in that the site is not allocated under this Policy - site reference is AS/086/090.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The site does not accord with Stage 2a of the Site Assessment Methodology due to the flood risk zone as identified in the TAN 15 Development Advice Maps.**

**The uses highlighted in the representation can be considered against the policy framework of the plan, however allocating the site (either for mixed use or employment) would be contrary to the Site Assessment Methodology - the C1 designation impacts on the site - and as such there would be a soundness issue.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4423 Mango Planning & Development Limited (Mr Arfon Hughes) [4877] Object**

*Summary:*

We introduce an opportunity site in Burry Port for complementary town centre uses. The proposed revision to the town centre boundary (see rep 3419 policy SP2) presents the opportunity to bring into the town centre boundary the 0.12 hectare vacant site that sits between the town centre car park and the bridge. This would be suitable for complementary town centre uses.

The primary objective is to seek its inclusion within the centre, in which case any further 'opportunity site' designation would not be necessary. If of course you take the view that the boundary ought not to be extended, then we would want to see an opportunity site designation.

Site reference is AS/016/024.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The site does not accord with Stage 2 (Phase 2b) of the Site Assessment Methodology for the following reason - Viability and deliverability, in that (for a mixed use scheme) sufficient evidence has not been provided to show the development is deliverable and financially viable and sufficient evidence has not been identified to show when the site will be brought forward for development.**

**The primary consideration is the fact that the site is currently subject to a planning application under reference PL/00330 for a proposed Class A1 foodstore store, improvements to existing site access, car parking, servicing and ancillary works. Therefore its identification as a mixed use site is not warranted or required.**

**In this regard, it is considered that the most reasonable course of action for this site is to leave it as 'white land' within the development limits, thus allowing flexibility moving forward. Any future proposals (if PL/00330 is not realised) can be considered against the Plan's policy framework.**

**The Council's response representation 3419 can be found under its responses to comments received on policy SP2.**

*Action*

**No change to the Plan.**





*Representation(s)*

**3818 Lightwood Planning (Mr Richard Walker) [5065]**

**Object**

*Summary:*

Policy SG1 should be amended to seek to meet as far as possible the higher growth options of 14,090 or 19,690 homes.

*Council's Initial Response*

**The Population and Household Projection Topic Paper and the evidence contained within the Demographic Forecasts undertaken by Edge Analytics (2018 and 2019) sets out the informing considerations and the justification for the population and household projections for the County.**

**In assessing and identifying the housing requirement for the Plan and in accordance with PPW 10 Para 4.2.6 the WG local authority level projections were utilised as a starting point. Edge Analytics sought to review and assess the appropriateness of the latest WG population and household projections for Carmarthenshire and sought to also provide an alternative suite of demographic and trend evidence to consider.**

**The Council considers that an appropriate and deliverable housing requirement within the deposit Revised LDP factors in the ability to meet the strategic objectives and policies of the Council, retains the young within the county, delivers for the needs of all our communities both urban and rural, and provides the opportunity for job creation, amongst others.**

**Policy SP1 identifies that in meeting the overall requirement of 8,835 dwellings during the plan period, the housing supply is set at 10,160 dwellings (15% general flexibility above the requirement). Some 6,986 residential units will be provided through allocations and those sites considered to be existing commitments. The remainder of the housing requirement will be met through allowances for large and small windfall sites recognising their contribution to housing delivery across the plan area.**

**Consideration will be given as appropriate to the need to amend or update relevant background /topic papers or evidence prior to submission.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3869 Welsh Government (Mr Mark Newey) [13]**

**Object**

*Summary:*

Category B - There is a focus in the plan through Policies SG1 and SP5 on developing strategic and large scale regeneration and mixed-use sites. Sites of over 100 units in Appendix 1 of the Infrastructure Plan are supported by information on phasing, infrastructure requirements and planning obligations but there is no evidence on master planning, viability, detailed costs or commitment from developers through Statements of Common Ground (SoCG).

*Council's Initial Response*

**The Council is currently undertaking further evidential work on key sites which includes the undertaking of Statements of Common Ground to establish the certainty of these sites being delivered during the plan period. The SoCG will consider matters on viability and the housing trajectory timescales.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3721 Mr Paul Evans [3701]**

**Object**

**Agent: Hayston Development & Planning Ltd (Mr Andrew Vaughan Harries) [5042]**

*Summary:*

Making an objection to the Deposit Revised Carmarthenshire Local Development against the exclusion of a potential mixed-use development site - SR/163/007,

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non-inclusion set out within the Site Assessment Table. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**The site is located within a C1 flood risk zone as delineated by the TAN15 Development Advice Maps.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4426 Mr Alfyn Thomas [5217]**

**Object**

**Agent: Integra (Mr Wyn Pryce) [5219]**

*Summary:*

Objection to the omission of the former Ystrad Colliery site, Glanamman being allocated as a mixed use site under Policy SG1.

The aim is to redevelop this old colliery site (currently designated as an employment site in the current LDP) into a modern business estate primarily for small to medium sized enterprises, together with - through careful layout planning - a range of housing to meet future local needs.

To ensure the overall viability of the project, it is essential that a range of social, affordable and private homes be built, clearly separated from the commercial development by a recreational area and landscaping. The site is too large for either all business or all housing development; hence the mixed development to satisfy both purposes.

*Council's Initial Response*

**The site is annotated as an existing employment site within the Plan to reflect current uses. Any future proposals in respect of this site will be considered under the policies contained within the Plan, most notable Policy EME1: Employment- Safeguarding of Employment Sites.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4127 Seasons Holidays plc ( \_ \_ \_ ) [5149]**

**Object**

**Agent: Lichfields (Mr Owain Nedin) [4937]**

*Summary:*

Object to the omission of land adjoining Laugharne Estate for a mixed-use allocation which will include visitor accommodation alongside ancillary leisure uses, recreation space and a new principal access road

*Council's Initial Response*

**Agree in part. The importance of high-quality tourism and leisure provision within the county is recognised. It is also recognised that the Season Holidays site within Laugharne is a long-standing tourism and leisure development. In reflecting this and its ongoing redevelopment, the Plan will be amended to include Phase 1 (to be delivered during the Plan period) as identified within the representation.**

The remainder of the site as identified within the representation is subject to a longer term deliverable aspiration. As such there is no certainty on its delivery and will not be included within the Plan. The policy framework set out within the revised LDP allows the potential development for tourism and the visitor economy where it is appropriately located. Any proposals submitted will be considered against the revised LDP policies.

*Action*

**Change to the Plan**

*Representation(s)*

**4095 Davies Richards Developments Ltd (N/A N/A N/A) [5087] Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Objection to the exclusion of candidate site SR/082/012 under Policy SG1.

We would however contest the above statement and consider its exclusion to be an erroneous decision by the Authority and consider therefore that the LDP is "unsound" and should be changed.

Specifically, we consider that (a) the SFCA was wrong to exclude the whole of the site from consideration and that (b) alternative allocations within the settlement and wider growth area are neither appropriate nor deliverable. We consider therefore that the land edged red in Plan A attached, should be allocated for a mixed use development facilitated by residential development.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3647 Landview Developments Ltd [5020] Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

We seek the allocation the land for a mix of residential development, areas of formal and informal amenity space, habitat enhancement areas, as well as improvements to local pedestrian and cycle link provision and linkages. The site comprises a series of existing enclosures, with vehicular access gained off the access estate road shared with a recently constructed residential development to its north east, although multiple pedestrian and cycle linkages would also be available along all boundaries of the site. Locationally, the site is also within close proximity to the range of community facilities and local services the settlement and surrounding area has to offer. A detailed report is provided as to why the site (SR/159/007) should be considered for a mixed use site under policy SG1.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3625 Low Carbon Construction Ltd [3827] Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Objection to the exclusion of the south western area of the Emlyn Brickworks site under policy SG1, whilst referring to the inclusion of non-deliverable sites in other parts of the settlement / area.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**The part of the site that falls within PrC3/MU1 has been subject to full consideration and as part of this process a detailed site proforma has been prepared.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3474 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830] Support**

*Summary:*

DCWW provide an analysis of the allocations within an appendix and there are no objections. DCWW have confirmed that this analysis can be logged and responded to within the LDP Infrastructure Assessment/Study. DCWW ask that the general comments that they have included at the introduction of the appendix be transferred over in addition

*Council's Initial Response*

**Comments noted.**

**The Infrastructure Assessment will be prepared / updated by the Council.**

*Action*

**No change to the Plan.**



**Paragraph SG1: Regeneration and Mixed Use Sites, PrC1/MU1**

*Representation(s)*

**3300 Barratt David Wilson Homes (Mrs Francesca Evans) [4879] Object**

*Summary:*

BDW is concerned that whilst this is a strategic site, there is no confirmation that an end user is in place in the form of a residential developer to deliver the quantum of development proposed within the Plan period. It comprises an existing allocation within the adopted LDP which is proposed to be 'rolled' forward by Carmarthenshire County Council. There is no evidenced justification for the continued allocation of this site, given that no progress has been made since its first allocation in 2014. The deliverability and viability of this site is therefore questionable.

*Council's Initial Response*

**It is considered that the continued allocation of the West Carmarthen Strategic site remains as a strategic site in the LDP. A Development Brief has been adopted on the site in order to ensure a comprehensive and integrated development is undertaken on the site. Since the adoption of the Brief in 2010, the link road has been completed and houses have been completed on the southern side of the site. The Council along with partners, landowners and housebuilders have invested time and resources into delivering this site over recent years. Planning applications are now coming forward for the site and it is considered that the site remains to be appropriate and deliverable for the mixed uses described within the Planning and Development Brief.**

*Action*

**No change to the Plan**



**Representation(s)**

**3233 Mr D Chapman [5063] Support**

**Agent: RPS Planning & Development (Mrs Kate Gapper) [797]**

**Summary:**

Strategic Policy SP 1: Strategic Growth proposes a housing target of 10,160 homes to meet the identified housing requirement of 8,835 homes. Under the umbrella of Strategic Policy SP1, Policy SG1 identifies land at West Carmarthen (Site Ref: PrC1/MU1) as being proposed for a mix of uses consisting of residential (an allowance for 700 new homes within the plan period), employment, community facilities and amenity. The policy recognises that a key deliverability indicator is the Carmarthen West Link Road which has been completed and is open.

We agree and support this mixed-use allocation for West Carmarthen and welcome development within this area.

**3842 Mr James Bromhead [5053] Support**

**Agent: RPS Planning & Development (Mrs Kate Gapper) [797]**

**Summary:**

Strategic Policy SP 1: Strategic Growth proposes a housing target of 10,160 homes to meet the identified housing requirement of 8,835 homes. Under the umbrella of Strategic Policy SP1, Policy SG1 identifies land at West Carmarthen (Site Ref: PrC1/MU1) as being proposed for a mix of uses consisting of residential (an allowance for 700 new homes within the plan period), employment, community facilities and amenity. The policy recognises that a key deliverability indicator is the Carmarthen West Link Road which has been completed and is open.

We agree and support this mixed-use allocation for West Carmarthen and welcome development within this area.

**3234 Mr D Chapman [5063] Support**

**Agent: RPS Planning & Development (Mrs Kate Gapper) [797]**

**Summary:**

In order to meet the requirement of 8,835 homes, provision is made for 10,160 homes in accordance with the identified settlement framework. This includes allocating sites for new homes in established settlements. Policy HOM1 allocates land at West Carmarthen (Site Ref: PrC1/MU1) for the development of 700 new homes within the plan period and makes provision for a total of 84 units (12%) to be affordable units. Policy HOM1 identifies this allocation coming forward within years 6-10 and 11-15 of the plan period i.e. 2024 onwards. We agree and support this housing allocation for West Carmarthen.

**3237 E & O & E Jones & Elias [5052] Support**

**Agent: RPS Planning & Development (Mrs Kate Gapper) [797]**

**Summary:**

In order to meet the requirement of 8,835 homes, provision is made for 10,160 homes in accordance with the identified settlement framework. This includes allocating sites for new homes in established settlements. Policy HOM1 allocates land at West Carmarthen (Site Ref: PrC1/MU1) for the development of 700 new homes within the plan period and makes provision for a total of 84 units (12%) to be affordable units. Policy HOM1 identifies this allocation coming forward within years 6-10 and 11-15 of the plan period i.e. 2024 onwards. We agree and support this housing allocation for West Carmarthen.

**3180 RPS Planning & Development (Mrs Kate Gapper) [797] Support**

*Summary:*

Strategic Policy SP 1: Strategic Growth proposes a housing target of 10,160 homes to meet the identified requirement of 8,835. Under the umbrella of Strategic Policy SP1, Policy SG1 identifies land at West Carmarthen (Site Ref: PrC1/MU1) as being proposed for a mix of uses consisting of residential (an allowance for 700 new homes within the plan period), employment, community facilities and amenity. The policy recognises that a key deliverability indicator is the Carmarthen West Link Road which has been completed and is open.

We agree and support this mixed-use allocation for West Carmarthen and welcome development within this area.

*Council's Initial Response*

**Support is welcomed**

*Action*

**No change to the Plan.**

**Paragraph SG1: Regeneration and Mixed Use Sites, PrC1/MU2**

*Representation(s)*

**3301 Barratt David Wilson Homes (Mrs Francesca Evans) [4879] Object**

*Summary:*

BDW is concerned that whilst this is a major urban extension to the south of Carmarthen, there is no confirmation that an end user is in place in the form of a residential developer to deliver the quantum of development proposed within the Plan period. The deliverability of this site is therefore questionable.

**3109 Mrs Hilary Foster [3606] Object**

*Summary:*

I have concerns regarding the development proposal at Pibwrlwyd. I live in Croesyceiliog village and at certain times of day traffic coming from Croesyceiliog has to queue for significant periods of time at Pibwrlwyd roundabout to get onto the A484. The Pibwrlwyd roundabout is a problematic bottleneck for traffic on this busy section of the A484, and the problem is already exacerbated by Bro Myrddin school traffic. The addition of new development in this area would make the problem even worse. In summary, the road infrastructure in this area cannot cope with increased development (particularly residential).

*Council's Initial Response*

**The allocation of the site within the LDP for mixed use has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. Further evidential work will be undertaken prior to the examination in to the revised LDP**

**The proposed use for the site is for a mix of potential uses, including residential, education and commercial uses consisting of offices and light industrial. It is also considered that part of the site is appropriate for residential development in order to support the other uses, and to ensure the site's viability.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3950 Coleg Sir Gar (Ceris Harries) [5101]**

**Support**

**Agent: Asbri Planning Ltd (Mr Keith Warren) [592]**

*Summary:*

The Deposit Revised Plan is supported on the basis that the Council have accepted the principle of residential uses at the scale proposed, while also allowing for a mix of other uses on the site at Pibwrlwyd (PrC1/MU2)

*Council's Initial Response*

**Support is welcomed.**

*Action*

**No change to the Plan.**



## Paragraph SG1: Regeneration and Mixed Use Sites, PrC2/MU2

### *Representation(s)*

**3581 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

#### *Summary:*

The site appears to provide important ecological connectivity features. Loss of ecosystem connectivity would be at odds with the fundamental aims of maintaining and enhancing biodiversity and Section 6, Part 1 of the Environment (Wales) Act 2016.

### *Council's Initial Response*

**Agreed in part.**

**The allocation of the site within the LDP was subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma was prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal.**

**In noting the above, the Council (as part of an iterative approach to Plan making) will always seek to respond to comments that further consolidate the soundness of the Plan. In this regard, it is noted that these concerns are expressed from a statutory consultee - Natural Resources Wales.**

**It should be noted that no feedback has been received from Natural Resources Wales that indicates that there is a way forward or that the concerns raised have been addressed by the candidate site promoter.**

**Amongst those notable concerns raised from a detailed review of Natural Resources Wales concerns on this site includes the fact that the site is heavily wooded and has a watercourse flowing through it providing a natural green corridor which appears to provide important connectivity.**

**It is considered these concerns would primarily relate to the west of the site (i.e. that part of the site where residential uses would be situated). In this regard, it is noted that the eastern part of the site is progressing in terms of planning - notably through full planning application reference S/39022 - approved subject to s106. Therefore it is not considered that the whole allocation requires deletion or that the allocation requires removal from the development limits.**

**Therefore, it is considered that the mixed use allocated site area should be amended / reduced to exclude the wooded area of the site to the west. This will lead to the removal of the residential allowance of 35 units, with consequential amendments to policy SG1 (site prc2/mu2 - including site description) and policy HOM1 (site prc2/mu2).**

**In terms of the housing figure of 35 units, suitable alternatives have been identified elsewhere in cluster 2 and are proposed as focused changes.**

### *Action*

**Amend the Plan (focused change).**

**Mixed use allocated site area to be reduced so that the wooded western area of the site is excluded. Remove the residential allowance of 35 units from this site.**

**Paragraph SG1: Regeneration and Mixed Use Sites, PrC3/MU1**

*Representation(s)*

**4267 - RSAI - [4993]**

**Object**

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

*Summary:*

PPW (Para 4.2.18) states that for housing regeneration sites, where deliverability is considered an issue, planning authorities should consider excluding such sites from their housing supply so that achieving their development plan housing requirement is not dependent on their delivery. We don't consider that this site should be used as a component to meet the housing requirement. The site should either be removed from the LDP or identified as a housing led regeneration site that does not form part of the supply to meet the housing requirement. Reference is made to representation 4248 (policy HOM1 - housing allocations). Also, refer to rep 4243 (policy HOM1) where the client's site is promoted .

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. Further evidence will be developed as the Plan goes into examination.**

*Action*

**No change to the Plan.**

**Paragraph SG1: Regeneration and Mixed Use Sites, SeC16/MU1**

*Representation(s)*

**4074 Aspect Developments (Aspect Developments) [5135]**

**Support**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

The allocation of the land in question for mixed use, together with the alteration of the development limits at this location to facilitate the comprehensive and effective development of the site, is supported (policies SG1 and SD1 cited) Work on the preparation of a full planning application for the development of the whole of the site is ongoing and discussions with the local planning authority and all interested parties are now at an advanced stage. It should be also noted that a number of end-users have already been identified for various aspects of the site, clearly supporting the deliverability of the allocation. The site's allocation results in the Deposit LDP being sound and meeting procedural requirements.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

**Paragraph Para 11.16**

*Representation(s)*

**3582 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Support**

*Summary:*

Paragraph 11.16 states that where appropriate the allocated sites and their identified uses will be considered further through Supplementary Planning Guidance (SPG) in the form of development briefs. We are happy to be involved in their production and can offer advice on the assessments and considerations required to support any subsequent planning application submission.

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*Council's Initial Response*

**Comments noted and welcomed. The Council will consult with the respondent at the relevant time and is grateful for the offer of input provided.**

*Action*

**No change to the Plan.**

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**Policy SG2: Reserve Sites**

*Representation(s)*

**3867 Welsh Government (Mr Mark Newey) [13]**

**Object**

*Summary:*

Category B - Reserve Sites Policy

Policy SG2: Reserve Sites lists 5 sites for a mix of uses including residential, employment and waste, which will be released for development if allocated and committed sites fail to come forward as expected. The rationale for the Reserve Sites policy is unclear not only because the Council has applied a discount allowance to committed sites in the landbank, but also because the plans flexibility allowance (of 15%) should account for non-delivery and unforeseen circumstances on sites. It is unclear how an application would be considered on such sites and its release controlled? It is not appropriate to add / remove sites through the monitoring framework outside of a formal plan review.

*Council's Initial Response*

**Agreed in part.**

**The policy enables the identification of sites which subject to the successful implementation or otherwise of the Revised LDP may contribute to future provision/delivery.**

**The respondent comments on the monitoring framework and the use of the formal plan review is noted. However, paragraph 11.18 of the Revised LDP states that "the need for reserve sites will be closely monitored through take-up of allocated sites as part of the monitoring framework of this Plan...."**

**It is however noted that any change to include the sites would need to be undertaken as part of a formal plan review.**

*Action*

**Plan to be amended to reflect the need for sites to be brought forward as part of a formal plan review. Paragraph 11.18 to be amended accordingly.**



*Representation(s)*

4268 - RSAI - [4993]

Object

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

*Summary:*

SG2/1 - Classed as having a medium flood risk in the Council's SFCA. It is adjacent to an area that is classified as C2 by the TAN15 Development Advice Maps. We question the suitability of the 'medium risk' sites, whether they will be able to meet the new TAN 15 justification test and ultimately whether they are deliverable. In this context we consider that developments should be directed to sites with a low risk of flooding - reference is made to rep 4243 where the client's site is promoted.

*Council's Initial Response*

**Comments noted.**

**Reference is made to paragraph 11.19 of the deposit Plan which clarifies that the need to identify an alternative range of reserve sites is necessary to ensure that the LDP strategy provides sufficient flexibility in the event that development on allocated and existing commitments stalls. Reference is also made to the emerging NDF and potential for a Strategic Development Plan (SDP).**

**In terms of site SG2/1, its spatial location in the south east of the County is considered to be worthy of note, whilst ongoing discussions around a Swansea Bay Metro are also noted. It is noted that some site specific considerations would need to be overcome, however an initial review of the site based on the Plan's Stage 1 SFCA and Stage1b SFCA do not indicate insurmountable issues.**

**Whilst the site is not allocated in the Plan, reference can be made to representation 3924 which can be found under the Council's responses to representations received on this policy (i.e. policy SG2), where its identification as a reserve site is supported by the site proponent/agent.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4393 Davies Richards Developments Ltd (N/A N/A N/A) [5087] Object**

***Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]***

***Summary:***

Objection to the exclusion of candidate site SR/082/012 under Policy SG2.

We consider its exclusion to be an erroneous decision by the Authority and consider therefore that the LDP is "unsound" and should be changed.

The Site represents a sustainable and deliverable opportunity to provide new housing for the settlement of Llandybie in a strategic fashion, as well as the larger Growth Area it forms part of. With the land already capable of being easily served by all services and an adopted means of access by virtue of the adjoining public highway, there are no barriers to its delivery within the early stages of the forthcoming Plan.

***Council's Initial Response***

**Disagree. The list of reserved sites identifies those which may come forward as part of a plan review process. In this regard, the review will enable additional sites to be promoted where there may be issues in relation to plan delivery. Consequently opportunities will exist for this site to be considered as part of this review process.**

***Action***

**No change to the Plan.**



*Representation(s)*

**3996 Cwm Environment Ltd (Sean Gallagher) [5039]**

**Object**

**Agent: Asbri Planning Ltd (Mr Keith Warren) [592]**

*Summary:*

Objection to Policy SG2 on the following grounds:

The site benefits from a separate policy in the adopted Local Development Plan - 'Policy WPP1 - Nantycaws Waste Management Facility' which allows for a range of waste management facilities. However, in the new Revised Deposit Plan, it is included as a 'Reserve Site' under Policy SG2/5.

This submission therefore objects to the Deposit Plan on the grounds that Nantycaws should be removed as a 'Reserve Site' and included as a waste allocation.

N.B refer also to Representation 4370.

*Council's Initial Response*

**Agreed in part.**

**The site including the waste management components will form part of a mixed use development aimed at delivering a strategic opportunity for waste management, energy from waste, and related employment based activities. The Council will be working with the respondent and CWM Environmental Ltd specifically, as well as infrastructure providers, to ensure the site's delivery and its timing is robustly**

*Action*

**Remove Nantycaws waste management site from Policy SG2: Reserve Sites and place into Policy SG1: Regeneration and Mixed Use Sites. Revise the site area on the Proposals Map to reflect the respondent's representation.**





*Representation(s)*

**3648 Landview Developments Ltd [5020]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

We seek the allocation the land for a mix of residential development, areas of formal and informal amenity space, habitat enhancement areas, as well as improvements to local pedestrian and cycle link provision and linkages. The site comprises a series of existing enclosures, with vehicular access gained off the access estate road shared with a recently constructed residential development to its north east, although multiple pedestrian and cycle linkages would also be available along all boundaries of the site. Locationally, the site is also within close proximity to the range of community facilities and local services the settlement and surrounding area has to offer. A detailed report is provided as to why the site (SR/159/007) should be considered for a mixed use site under policy SG2.

*Council's Initial Response*

**Disagree. The list of reserved sites identifies those which may come forward as part of a plan review process. In this regard, the review will enable additional sites to be promoted where there may be issues in relation to plan delivery. Consequently opportunities will exist for this site to be considered as part of this review process.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3475 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]**

**Support**

*Summary:*

Owing to the unknowns regarding the Reserve Sites, we are not able to provide comments currently. We would be happy to provide further information if further details are provided.

*Council's Initial Response*

**Comments noted.**

**The Council will consult with the respondent as and where appropriate with regards this matter.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3924 Johnson Brothers [5093] Support**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Support given to Policy SG2, specifically SG2/1. A host of supporting documentation is attached, including the previous candidate site submission (SR/086/077) along with technical/supporting evidence - notably transport and ecology. We can also confirm that the land continues to not face any ecological, flood risk related, highway, infrastructure or land ownership constraints that would restrict its ability to be delivered during the Plan period as a Reserve Site. In fact, our Clients have already been approached by a number of parties expressing a keen interest in developing the site should it be made available. We therefore fully support the decision of the Authority to include the land as a Reserve Site as part of the Deposit LDP.

*Council's Initial Response*

**Comments noted/support welcomed.**

*Action*

**No change to the Plan.**

**Policy SG3: Pembrey Peninsula**

*Representation(s)*

**3476 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830] Object**

*Summary:*

Unsurprisingly given its undeveloped nature, the majority of the peninsula is unsewered and does not have a water supply with only elements of the south east of the peninsula currently served by either. As such, any proposals on the development of this location will likely require significant offsite water mains and sewers. Further to this, the Pembrey Wastewater Treatment Works (WwTW) that serves the south east of the peninsula currently has no additional capacity to accommodate any further development. For any proposal, there will therefore be the requirement to fund reinforcement works at the WwTW if development is to progress in advance of our own capital investment.

*Council's Initial Response*

**Comments noted. The Council is grateful for the clarity provided. The Council will prepare Supplementary Planning Guidance to provide further elaboration upon the provisions of this policy and the future opportunities within the Peninsula and as such the input of key consultees such as Dwr Cymru Welsh Water will be sought as part of an integrated approach.**

*Action*

**No change to the Plan**

**Policy Strategic Policy - SP 2: Retail and Town Centres**

*Representation(s)*

**3419 Mango Planning & Development Limited (Mr Arfon Hughes) [4877] Object**

*Summary:*

Objection to Policy SP2 (in relation to the Burry Port Proposals Map):

The town centre boundary of Burry Port does not reflect either the existing or future intended function of the centre. There is no apparent rationale for this. There has apparently been no re-evaluation of this boundary since the previous iteration of the development Plan. The boundary as drawn is illogical, irrational and incoherent.

In order to be appropriate, the Proposals Map for Burry Port should be amended to include the road bridge crossing and the town centre car park (as shown in the full submission).

Also, this would allow an opportunity 0.12 ha vacant site developed for complementary town centre uses - see rep 4423 (policy SG1).

Site reference is AS/016/022.

*Council's Initial Response*

**Comments noted.**

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The site does not accord with Stage 2a - Initial Detailed Site Assessment (site cannot accommodate 5 dwellings - it is not a residential proposal here, the intention is to increase the area of the Retail Town Centre of Burry Port).**

**The Council considers that Burry Port Retail Town Centre has been defined suitably and its status as a Lower Order Town Centre is appropriate. Reference is made to Strategic Policy 2 - Retail and Town Centres - in this regard.**

**It is noted that much of the proposed revision to the Town Centre boundary proposed by the respondent includes an area that is used as a public car park.**

**In terms of the Plan's policy framework, reference can be made to policy SP 2: Retail and Town Centres (criterion c) in terms of proposals for convenience stores of an appropriate scale within the designated Mid and Lower Order Town Centres which are located within or immediately adjoining the defined town centre boundary.**

**It can be noted that the Council's response representation 4423 can be found under its responses to comments received on policy SG1: Regeneration and Mixed Use Sites.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3420 Mango Planning & Development Limited (Mr Arfon Hughes) [4877] Object**

*Summary:*

Our representation raises OBJECTION to the following:

Policy SP2 - Retail and Town Centres

The numbering of Policy SP2 is confusing, presenting two sets of numbered criteria lists. This ought to be clarified.

We are also concerned that the retail policies of the Plan are based on an out of date retail evidence base. The latest study is already five years old. It is our view that it does not present a robust and credible evidence base. In order for the Plan to meet the test of appropriateness, this evidence base must be updated.

*Council's Initial Response*

**Noted. The policy is sufficiently clear. Any amendments required to the criterion numbering are minor editorial matters.**

**The evidence base in relation to retail matters will be considered as appropriate. Note: reference should be had to the Covid-19 Assessment of the Revised LDP.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4589 Ceredigion County Council (Anjuli Davies) [5303]**

**Object**

*Summary:*

Ceredigion County Council confirms that the retail hierarchy set out within SP2 is consistent with that identified within the Pembrokeshire & Ceredigion Regional Retail Capacity study (Carter Jonas, 2017). The terminology used in policy SP2 should be sufficiently broad to encompass retail centres in Ceredigion and to ensure that retail proposals within Carmarthenshire would not have an adverse impact on retail centres within Ceredigion. The Council would welcome a statement clarifying that convenience stores (above a certain scale) outside of High, Mid and Low order centres will not be supported. This would deter further attempts to secure retail provision in settlements such as Cwmann or Pontyweli.

*Council's Initial Response*

**Agreed in part. The Council welcomes the confirmation of the consistency of the retail hierarchy set out within SP2 with that identified within the Pembrokeshire & Ceredigion Regional Retail Capacity study.**

**The Council recognises the importance of cross border working and the implications particular proposals can have where closely related to settlements within a neighbouring authority. In this regard appropriate provision will be made to reflect the impact of convenience retail proposals may have on defined retail centres within neighbouring authorities.**

*Action*

**Amend the plan to include appropriate reference to the consideration of cross border implications.**

*Representation(s)*

**3999 Kames Capital UK Active Value Property Unit Trust (To whom it may concern) [5119]**

**Support**

**Agent: ROK Planning (Amy Chan) [4687]**

*Summary:*

Carmarthen sits atop of the retail hierarchy within the District, is identified as a "Sub Regional - High Order Town Centre" and the Council should plan for a range of uses beyond traditional retailing (Use Class A1) in order to protect and support the centre. Therefore, the revised wording of Strategic Policy SP2 and the supporting text, which acknowledges the role different centres have and supports a variety of uses in addition to traditional retail uses (Use Class A1) in higher order centres such as Carmarthen, is supported.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

**Paragraph Para 11.52**

*Representation(s)*

**3256 Matthew Utting [2833]**

**Support**

*Summary:*

Moreover, my client supports paragraphs 11.523 to 11.526 of the LDP, which confirm that the majority of new residential development, including housing allocations (defined as sites capable of yielding 5 dwellings or more), will be directed to the County's Principal Centres over the LDP period.

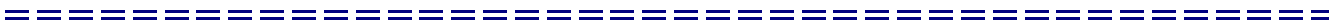
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*Council's Initial Response*

**Noted.**

*Action*

**No change to the Plan.**



## Policy RTC1: Carmarthen Town Centre

### Representation(s)

**3421 Mango Planning & Development Limited (Mr Arfon Hughes) [4877] Object**

#### Summary:

Policy RTC1 is unclear and confusing as it implies that any retail development, irrespective of location in the County Borough, must meet this positive requirement:

"Proposals will be permitted where they maintain and enhance the vitality, viability and attractiveness of Carmarthen Town Centre."

This leads to the perverse situation where a proposal within another defined centre could fall foul of the policy because it does not enhance Carmarthen's health.

The policy is also inconsistent with PPW at paragraph 4.3.25 insofar as the test for proposals outside any centre is that there is no adverse harm of that centre's vitality and viability.

**4000 Kames Capital UK Active Value Property Unit Trust (To whom it may confer) [5119] Object**

**Agent: ROK Planning (Amy Chan) [4687]**

#### Summary:

The proposed amended retail frontage to Secondary Town Centre Retail Area for the majority of the Cambrian Way Shopping Centre is supported.

**4003 Kames Capital UK Active Value Property Unit Trust (To whom it may confer) [5119] Object**

**Agent: ROK Planning (Amy Chan) [4687]**

#### Summary:

Seek the relaxation of the town centre use restrictions across the Cambrian Way centre and the candidate site (SR/021/052) to be suitable for Residential / Mixed Use including retail and ancillary commercial/leisure uses. will ensure the viability of the centre which will contribute positively to the overall health and vitality of Carmarthen as the Sub-Regional centre.

**4002 Kames Capital UK Active Value Property Unit Trust (To whom it may confer) [5119] Object**

**Agent: ROK Planning (Amy Chan) [4687]**

#### Summary:

It is considered that Cambrian Way should be designated wholly Secondary Town Centre Retail Area to ensure flexibility and support a diverse range of retail, leisure and ancillary town centre uses, such as residential and office space, to enhance competitiveness and vitality throughout the centre. Non-A1 retail uses are considered to play a "positive role" in supporting centres and increasing footfall, in accordance with Paragraph 9.2 of TAN4.

*Council's Initial Response*

**Noted.** Policy RTC1 is subject to review as part of the response to the impacts arising from Covid-19. In this respect reference is made to the Covid-19 assessment an the impact on the retail position within Carmarthen Town Centre.

The Welsh Government in Building Better Places: The Planning System Delivering Resilient and Brighter Futures - Placemaking and the Covid-19 recovery clearly identified the impact of the Covid-19 lockdown on our retail and commercial centres. Town Centres largely became deserted except for those people shopping for essential items with the comparison retail sector notably impacted. Building Better Places identifies that: "The economic consequences have meant that many retailers are struggling financially, and this will lead to higher vacancy rates in all of our commercial centres. Online competition to our town centre retailers was strong before the crisis; this situation will become more apparent as more retailers increase their online presence and more people have become used to doing the majority of their non-essential shopping online."

The WG in recognising the central role of retail and commercial centres state that they "should become places where a variety of retail, employment, commercial, community, leisure, health and public sector uses come together in a hub of activity to make them viable as go-to destinations once more."

As the challenges to respond to the impact of Covid-19 becomes clear and as the town centre reshapes itself, it would suggest that traditional retailing uses will not be as prevalent and the demand for new retail space may lessen. Consequently, its role will need to be reviewed in light of Covid19, and that this must be realistic recognising that retail occupiers may not return in the way prior to the pandemic.

*Action*

Amend the Plan to reflect any revisions arising from the review of Policy RTC1 in light of Covid-19 and its effect on Retail centres.



**Policy RTC3: Retail in Rural Areas**

*Representation(s)*

**4590 Ceredigion County Council (Anjuli Davies) [5303] Object**

*Summary:*

Given the close proximity of many settlements to each other and across the Carmarthenshire / Ceredigion border, suggest that criterion B is be amended to state that; 'It will not result in significant harm to the viability of nearby village shops or retail centres.' This will encompass retail centres within Ceredigion as well as Carmarthenshire.

*Council's Initial Response*

**Disagree.** Paragraph 11.73 of the supporting text to Policy RTC3 already makes provision for the potential to prevent any significant harm to nearby retail activity.

*Action*

**No change to the Plan.**





**Policy Strategic Policy - SP 3: A Sustainable Approach to Providing New Homes**

*Representation(s)*

**3856 Welsh Government (Mr Mark Newey) [13]**

**Object**

*Summary:*

Category C - The Council's large site windfall allowance (+5 units) is 89 dwellings per annum based on past trends over a 12 year period (2008-2019). Within this period are years of high completions (+120 units) and low completions (40 units) which have not been discounted from extrapolation rates. The Council must robustly evidence the large sites windfall allowance of 89 units per annum to ensure it is appropriate, robust and deliverable.

*Council's Initial Response*

**The Council considers that the windfall allowance on large sites has been robustly evidenced within the housing supply topic paper, and is based on 12 years of housing completion data**

*Action*

**No change to the Plan.**

*Representation(s)*

**3858 Welsh Government (Mr Mark Newey) [13]**

**Object**

*Summary:*

Category C - The small sites windfall allowance (1-4 units) is 122 dwellings per annum, which exceeds completions over the past 4 years which average 102 units (2019 JHLA). The Council should explain why the small sites allowance in the plan is not in line with past trends?

*Council's Initial Response*

**Noted. The Council considers that the windfall allowance for small sites has been robustly evidenced within the housing supply topic paper based on the previous 4 years of housing completion trends (102 dwellings).**

**In addition the higher figure includes the additional dwellings which could potentially be developed from Tier 4 settlements where the development limits have been removed. Further work will be undertaken leading into the examination to address the issues raised, with updates to the background topic papers.**

*Action*

**No change to the Plan**

*Representation(s)*

**3850 Welsh Government (Mr Mark Newey) [13]**

**Object**

*Summary:*

Category B - Spatial Strategy and Distribution

The Authority has tested 6 spatial options to identify how future growth will be distributed across the plan area. The Council's preferred option is a hybrid approach that builds on Strategic Option 4: Community Led and reflects the role and function of settlements whilst providing opportunities for growth in urban and rural areas (LDP, paragraph 8.20). Policy SP16: Sustainable Distribution, identifies 6 clusters. Within each cluster is a functionally linked area with 4 settlement tiers comprising Tier 1: Principal Centres, Tier 2: Service Centres, Tier 3: Sustainable Villages and Tier 4: Rural Villages. The Welsh Government does not object to the principal of this approach, providing that the majority of development is directed to sustainable locations in the County and the impacts on Welsh language have been fully considered (see specific comments).

a) Spatial distribution of large windfall sites

The Welsh Government considers that the spatial distribution of housing across all clusters and settlement tiers is incomplete. There is a significant amount of information regarding the components of housing supply spread across the plan and its supporting evidence base (Housing Supply Topic Paper, January 2020). However, this is not in one place, as required by the DPM Edition 3. The Welsh Government has attempted to attribute the plans housing growth to the relevant tiers and clusters in the tables overleaf. It appears the majority of development (excluding large windfalls) is directed to the most sustainable locations in Tiers 1 and 2 (70%) which is broadly supported and addresses, to some extent, our concerns raised at Preferred Strategy stage. However, this distribution excludes 1300 units on large windfall sites, a significant omission. Without clarity on this matter, the spatial distribution or suitability of the strategy in terms of sustainability and impacts on the Welsh language is unclear and requires clarification. Whilst the scale and distribution of large windfall sites is unclear, the Welsh Government envisages the majority would come forward in Tiers 1 and 2 and Clusters 1 and 2? This position is supported by policy in the draft National Development Framework (NDF) which focuses growth in the 'Mid and South West Region' to the Principal Centres of Llanelli and Carmarthen. The Council's 'Role and Function' Topic Paper highlights the majority of Tier 3 settlements having limited or no key facilities / primary services (Table 13) and the rationale for supporting further developments here would be unclear. (See also comments relating to Tier 4 and 5 specifically).  
(Table appended)

*Council's Initial Response*

**Noted. The respondent notes the level of evidence available in support of the sustainable distribution of housing growth. However the council recognises that further information will be required in order to ensure that some of the matters raised are sufficiently clear. Further background evidence will be provided leading into examination.**

*Action*

**No change to the Plan.**

**Representation(s)****4028 Dyfodol (J W Thomas) [563]****Object****Summary:**

Rhwng 2001 a 2019 gwelwyd cynnydd o 12,800 ym mhoblogaeth Sir Gaerfyrddin er gwaethaf bod y raddfa marwolaethau'n uwch na'r raddfa genedigaethau a'r all-lif parhaus o bobl ifanc. Mae'r cynnydd oherwydd mudo mewnol. Mae'r mewnlifiad o filoedd o bobl, yn bennaf siaradwyr di-Gymraeg, yn un o'r ffactorau sydd wedi achosi gostyngiad yng nghanran y siaradwyr Cymraeg yn y sir fel y gwelir yng nghyfrifiad 2011. Mae angen amser i roi addysg a pholisïau eraill ar waith i ddadwneud y gostyngiad, a byddai targed mwy realistig o oddeutu 5,000 o dai ar gyfer y CDLI hwn yn hwyluso gweithredu'r polisïau hyn.

Between 2001 and 2019 Carmarthenshire's population grew by 12,800 despite the death rate exceeding the birth rate and the continuing outflow of young people. The increase is attributed to internal migration. The influx of thousands of people, largely non Welsh speakers, is one of the factors which caused a decline in the percentage of Welsh speakers in the county as shown in the 2011 census. Time is needed to implement education and other policies to reverse this decline, and a more realistic target of 5,000 or so houses for this LDP would facilitate the implementation of these policies.

**Council's Initial Response****Nodir y sylwadau.**

**Bydd rhagor o dystiolaeth yn cael ei darparu cyn cyflwyno'r Cynllun i'w Archwilio. Mae hyn yn cynnwys adeiladu ar yr Asesiad o'r Effaith ar y Gymraeg (Rhagfyr 2019), ymgymryd â gwaith dadansoddi pellach o ran Rhagamcanion poblogaeth ac Aelwydydd / data mudo a hefyd diweddarau yr Astudiaeth Economaidd Dwy Sir ar gyfer Sir Gaerfyrddin a Sir Benfro (Hydref 2019). Bydd y diweddariad yma i'r Astudiaeth Economaidd yn rhoi ystyriaeth bellach i gysylltiadau rhwng y Gymraeg a'r economi yn y ddwy Sir.**

**Comments noted.**

**Further evidence will be produced ahead of the submission of the Plan for Examination. This includes building upon the Welsh Language Impact Assessment (December 2019), undertaking further analysis work in terms of population and household projections/ migration data and also updating the Two County Economic Study for Carmarthenshire and Pembrokeshire (October 2019). This update to the Economic Study will further consider the links between the Welsh language and the economy in the two Counties.**

**Action****Dim newid i'r Cynllun.****No change to the Plan.**

**Representation(s)****4599 Rhanbarth Sir Gâr Cymdeithas yr Iaith (Rhanbarth Sir Gâr) [2370]****Object****Summary:**

Man cychwyn y cynllun diwygiedig, mae'n debyg, yw Strategaeth Gorfforaethol y Cyngor Sir a'r Cynllun Adfywio a gyhoeddwyd yn 2015. Yn hytrach na gofyn faint o dai fydd eu hangen ar sail ystadegau o'r degawd diwethaf ac amcanestyniadau Llywodraeth Cymru sydd yn seiliedig arnynt, mae'n anodd peidio â dod i'r casgliad i'r Cyngor Sir ofyn faint o dai fyddai eu hangen er mwyn cyflawni amcanion ei strategaeth adfywio. Er bod amcanestyniadau diweddarar Llywodraeth yn dangos y bydd poblogaeth Cymru'n gostwng dros gyfnod y cynllun diwygiedig, mae'r Cynllun Adneuo'n disgwyl twf o 15,115 (8.1%) ym mhoblogaeth y Sir a bod angen "10,160 o dai er mwyn darparu 8,835 o dai", a hynny er mwyn cyflawni amcan o greu 5,295 o swyddi. Nodwn yn hyn o beth sylwadau Mark Newey ar ran Llywodraeth Cymru (Adroddiad ar yr Ymgynghoriad Cychwynnol). Er bod y Cynllun Adneuo'n ateb ychydig o bryderon Mr Newey, mae yna ddiffyg tystiolaeth sylweddol o hyd o ran dyraniadau tai a'r safleoedd cyflogaeth. Tra bod y Cyngor yn credu y gallai'r Pentref Gwyddor Bywyd a Llesiant greu "hyd at 2,000" o swyddi, nid oes unrhyw ffigyrau ar gael ar gyfer y safleoedd cyflogaeth eraill, gan gynnwys Yr Egin. Gan fod y Pentref Llesiant mor allweddol i'r cynllun diwygiedig (38% o'r 5,200 o swyddi newydd), mae'r diffyg gwybodaeth am sut mae'r Cyngor yn mynd i gyflawni'r datblygiad hwn yn destun pryder. I ddyfynnu Mr Newey, "The Deposit plan must demonstrate deliverability of both individual sites [h.y. Yr Egin a'r Pentref Llesiant] and in combination, together with Statement of Common Ground with developers". Cred rhai o'r cynghorwyr Sir y gallai'r Cyngor addasu'r Cynllun Datblygu Lleol trwy ddileu canran o'r dyraniadau tai os na chyflawnir y Pentref Llesiant. Nid yw Cymdeithas yr Iaith o'r farn y byddai hyn yn gyfreithlon. Beth bynnag, mae yna risg sylweddol y byddai datblygiadau mawr ar gyrion Llanelli, yng Nghwm Gwendraeth a Dyffryn Aman yn annog mewnlifiad o Abertawe a Chastell Nedd Port Talbot a thanseilio'r Gymraeg yn rhai o'i chadarnleoedd. Nodwn fod Llywodraeth Cymru o'r un farn â Chymdeithas yr Iaith.

The starting point for the revised plan, apparently, is the County Council's Corporate Strategy and the Regeneration Plan published in 2015. Rather than asking how many houses will be needed on the basis of statistics from the last decade and the Welsh Government's projections based on them, it is difficult not to conclude that the County Council asked how many houses would be needed in order to achieve the objectives of its regeneration strategy. Although the Government's latest projections show that the population of Wales will decrease over the period of the revised scheme, the Deposit Plan expects growth of 15,115 (8.1%) in the County's population and that "10,160 houses are needed to provide 8,835 houses", in order to achieve an objective of creating 5,295 jobs. We note in this regard Mark Newey's comments on behalf of the Welsh Government (Initial Consultation Report). Although the Deposit Plan responds to a few of Mr Newey's concerns, there is still a significant lack of evidence in terms of housing allocations and the employment sites. While the Council believes that the Wellness and Life Science Village could create "up to 2,000" jobs, no figures are available for the other employment sites, including Yr Egin. As the Wellness Village is so key to the revised plan (38% of the 5,200 new jobs), the lack of information on how the Council is going to deliver this development is a cause for concern. To quote Mr Newey, "The Deposit plan must demonstrate deliverability of both individual sites [i.e. Yr Egin and the Wellness Village] and in combination, together with a Statement of Common Ground with developers". Some of the county councillors believe that the Council could adjust the Local Development Plan by removing a percentage of housing allocations if the Wellness Village is not delivered. Cymdeithas yr Iaith do not consider that this would be lawful. In any case, there is a significant risk that major developments on the outskirts of Llanelli, in the Gwendraeth Valley and the Amman Valley would encourage an influx from Swansea and Neath Port Talbot and undermine the Welsh language in some of its heartlands. We note that the Welsh Government is of the same opinion as Cymdeithas yr Iaith.

***Council's Initial Response***

**Nodir y sylwadau.**

**Cafodd Strategaeth y Cynllun a'i ddull cynaliadwy o ddarparu tai newydd ei seilio ar egwyddorion datblygu cynaliadwy ac yn unol â darpariaethau'r polisi cynllunio cenedlaethol. Mae'r ffigur gofyniad tai ar gyfer y Sir yn seiliedig ar amcanestyniad 10 mlynedd o Dwf y Boblogaeth y mae tystiolaeth gadarn ohono - fodd bynnag, adolygir hyn cyn Archwilio'r Cynllun.**

**Mae'r safleoedd hynny a ddyrannwyd yn y CDLI at ddibenion preswyl wedi cael eu hystyried yn llawn trwy'r fethodoleg asesu safleoedd. Fel rhan o'r broses asesu hon, paratowyd ffurflen safle.**

**O ran dosbarthiad gofodol, mae'r Cynllun yn destun Arfarniad Cynaliadwyedd/Asesiad Amgylcheddol Strategol, a hefyd yn cael ei gefnogi gan Asesiad o'r Effaith ar y Gymraeg (Rhagfyr 2019).**

**Comments noted.**

**The Plan's Strategy and its sustainable approach to the provision of new homes has been formulated on the basis of sustainable development principles and in accordance with the provisions of national planning policy. The housing requirement figure for the County is based on the Population Growth (PG) - 10yr projection scenario which is robustly evidenced - however this will be reviewed ahead of the Examination of the Plan.**

**Those sites allocated within the LDP for residential purposes have been subject to full consideration in accordance with the site assessment methodology. As part of this assessment process a site pro forma has been prepared.**

**In terms of spatial distribution, the Plan is subject to Sustainability Appraisal / Strategic Environmental Assessment, whilst it is also supported by a Welsh language Impact Assessment (December 2019).**

***Action***

**Dim newid i'r Cynllun.**

**No change to the Plan.**



*Representation(s)*

**4603 Rhanbarth Sir Gâr Cymdeithas yr Iaith (Rhanbarth Sir Gâr) [2370]****Object****Summary:**

O rhan y farchnad dai, mi fydd y Cyngor yn ymwybodol o'r hyn sy'n digwydd yn y farchnad dai ar hyn o bryd, gyda phrisiau tai'n cynyddu tu hwnt i bob rheolaeth ar draul ein cymunedau, gan roi pobl ifainc a theuluoedd â phlant yn enwedig dan anfantais ychwanegol. Yn gyfamserol, mae argyfwng brys o ran gweithrediad y farchnad dai ac eiddo yn ardaloedd gwledig y Sir, ac mae cymunedau cyfan yn colli cyfran helaeth o'u cartrefi trwy'r farchnad i ail gartrefi, tai gwyliau fel AirBnB, a thai i fewnfudwyr cyfoethocach sy'n symud i mewn i ymddeol neu i weithio o gartre ffwrdd o'r dinasoedd. O'r herwydd, galwn ar Gyngor Sir Caerfyrddin, wrth ichi baratoi'r Cynllun Adnau, i bwysu ar Lywodraeth Cymru i basio Deddf Eiddo i gwrdd â'r argyfwng, fel y canlyn: (1) Gosod cyfrifoldeb ar Awdurdodau Lleol i ddynodi ardaloedd lle mae gweithrediad y farchnad dai yn gosod pwysau ar allu trigolion lleol i brynu a rhentu tai ar raddfa gymesur â chyflog lleol cyfartaledd, (2) Rhoi grymoedd a chyllid rhesymol i'r Awdurdodau Lleol reoli'r farchnad dai yn yr ardaloedd hyn, a gweithredu camau cyffredinol trwy'r sir i sicrhau na chaiff y problemau ond eu symud i ardal arall, (3) Ymhlith y grymoedd penodol (i ardaloedd) a chyffredinol (i sir gyfan) byddai \* Sefydlu fod angen caniatad cynllunio i newid defnydd tŷ i fod yn ail gartref neu yn eiddo masnachol i'w osod at wyliau neu AirBnB; \* Hawl gosod uchaf-gyfran o dai mewn ardal benodol y gellir eu defnyddio at ddibenion felly (ail gartrefi neu eiddo masnachol); \* Cynyddu treth (ac atal dulliau osgoi talu) ar eiddo a gaiff ei ddefnyddio at ddibenion felly, a chau'r bwlch cyfreithiol sy'n golygu bod modd optio allan o dalu treth cyngor. \* Rhoi hawl pryniant gorfodol ar eiddo gwag neu eiddo sy ar y farchnad mewn ardaloedd penodol a chyllid yn sail i hyn (a allai ddigolledu gwerth negyddol "Negative equity"); \* Cronfa hybu mentrau twristiaeth gymunedol (4) Adolygiad bob dwy flynedd o weithrediad y camau hyn a galluogi rheoliadau i'w diwygio os daw dulliau osgoi i'r amlwg. Mae yna risg sylweddol pe bai'r Cyngor yn mynnu cadw at y strategaeth a amlinellir yn y Cynllun diwygiedig, y byddai cynnydd arwyddocaol yn y stoc tai yn mynd (yn uniongyrchol neu'n anuniongyrchol) at greu mwy o ail gartrefi, tai gwyliau ac i ddenu mewnlifiad yn hytrach nag ar gyfer gweithwyr mewn swyddi newydd.

In terms of the housing market, The Council will be aware of what is currently happening in the housing market, with house prices increasing beyond all control at the expense of our communities, putting young people and families with children in particular at an additional disadvantage. Concurrently, there is an urgent crisis in the functioning of the housing and property market in rural areas of the County, and whole communities are losing a large proportion of their homes due to the second homes market, holiday houses such as AirBnB, and houses for wealthier incomers moving to retire or to work from home away from the cities. We therefore call on Carmarthenshire County Council, in preparing the Deposit Plan, to urge the Welsh Government to pass a Property Act to meet the crisis, as follows: (1) Place a responsibility on Local Authorities to identify areas where the functioning of the housing market puts pressure on the ability of local residents to buy and rent houses on a scale proportionate to average local salary, (2) Provide Local Authorities with reasonable funding and powers to control the housing market in these areas, and to take general action throughout the county to ensure that the problems are not merely moved to another area, (3) Specific powers (for areas) and general powers (for a whole county) would include \* Establishing that planning permission is required to change the use of a house to a second home or commercial property to be let for holidays or AirBnB; \* A right to set a maximum proportion of housing in a particular area that can be used for such purposes (second homes or commercial property); \* Increase tax (and prevent means of evasion) on properties used for such purposes, and close the legal loophole that means it is possible to opt out of paying council tax; \* Granting compulsory purchase on vacant properties on the market in certain areas and funding as a basis for this (which could compensate for the negative value of "Negative equity"); \* A community tourism initiative promotion fund (4) Biennial review of the implementation of these actions and enable regulations to be amended if means of evasion emerge. There is a significant risk that if the Council insists on adhering to the strategy

outlined in the revised Scheme, a significant increase in the housing stock would go (directly or indirectly) towards the creation of more second homes, holiday homes and to attracting an influx rather than for workers in new jobs.

### *Council's Initial Response*

**Nodir y sylwadau.**

**Bydd rhagor o dystiolaeth yn cael ei darparu cyn cyflwyno'r Cynllun i'w Archwilio. Mae hyn yn cynnwys adeiladu ar yr Asesiad o'r Effaith ar y Gymraeg (Rhagfyr 2019), ymgymryd â gwaith dadansoddi pellach o ran Rhagamcanion poblogaeth ac Aelwydydd / data mudo a hefyd diweddarau yr Astudiaeth Economaidd Dwy Sir ar gyfer Sir Gaerfyrddin a Sir Benfro (Hydref 2019). Bydd y diweddariad yma i'r Astudiaeth Economaidd yn rhoi ystyriaeth bellach i gysylltiadau rhwng y Gymraeg a'r economi yn y ddwy Sir.**

**Pwerau cyfyngedig sydd gan y system cynllunio defnydd tir o ran perchentyaeth ail gartref/cartref gwyliau ar hyn o bryd.**

**Mae'r dilysrwydd posibl o drafod rhinweddau 'lobïo' Llywodraeth Cymru yn ogystal â chynnal trafodaeth ehangach o'r materion a godwyd yn y sylwad yma yn cael ei chydnabod. Mae hyn, fodd bynnag, y tu allan i'r maes gorchwyl i gael ei gynnwys yn y CDLI Diwygiedig. O ganlyniad, mae'r mater hwn wedi'i gyfeirio at bartneriaid mewnol i'w ystyried ymhellach.**

**Comments noted.**

**Further evidence will be produced ahead of the submission of the Plan for Examination. This includes building upon the Welsh Language Impact Assessment (December 2019), undertaking further analysis work in terms of population and household projections/ migration data and also updating the Two County Economic Study for Carmarthenshire and Pembrokeshire (October 2019). This update to the Economic Study will further consider the links between the Welsh language and the economy in the two Counties.**

**The land use planning system has limited powers in regards to second home / holiday home ownership at the present time.**

**The potential validity in debating the merits of 'lobbying' the Welsh Government as well as undertaking a wider discussion of the matters raised within this representation is recognised. This is, however, outside of the remit of inclusion within the Revised LDP. Consequently, this matter has been forwarded to internal partners for further consideration.**

### *Action*

**Dim newid i'r Cynllun.**

**No change to the Plan.**

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**Representation(s)****4233 - RSAI - [4993]****Object****Agent: Lichfields (Mr Arwel Evans) [3166]****Summary:**

The LDP SCFA categorises sites into different flood risk from Low, Medium, Medium High to High. Looking at Llangennech specifically we can see that two of the largest allocated sites in the settlement are identified as being of medium flood risk. We also note that the Former Morlais Colliery reserve site (SG2/1) is also classed as having a medium flood risk. These are medium risk sites. The Stage 1B Flood Report prepared by Atkins acknowledges the risk in relation to these sites and states: "The implications of this risk are dependent on the nature of updates to national policy on development and flood risk, which are expected to be implemented within the cycle of developing the Revised LDP." Based on the Welsh Government's recent consultation on TAN15 we understand that the Government's stance on locating new developments in areas of flood risk will become even stricter. This is in the context of climate change, the recent severe flooding in Wales and the need to build a resilient Wales. The consultation document on TAN15 seeks to direct development to Zone 1 (very low risk) and only to Zone 2 (low risk) if the development meets strict tests. It is also worth noting the Planning Minister's Call in Decision qA1408568 which refuses a planning application due to flooding reasons. In the letter, the minister states: "I am not convinced that the scheme accords with the WFG Act's sustainable development principle. Specifically, I consider the scheme fails to accord with the Welsh Ministers' well-being objectives in terms of driving sustainable growth and combatting climate change and building resilient communities." We therefore question the suitability of the 'medium risk' sites, whether they will be able to meet the new TAN 15 justification test and ultimately whether they are deliverable. Beyond Llangennech we are also concerned by a number of allocations that are subject to medium, medium high and even high flood risk, according to the SFCA. A specific objection is made under rep 4250 (high risk site - sec4/h2). We question whether it is appropriate for the plan to rely on these sites for the delivery of the housing requirement when better sites are available. In this context we consider that developments should be directed to sites with a low risk of flooding - reference is made to rep 4243 where the client's site is promoted.

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*Council's Initial Response*

**Comments noted.**

**The Council agrees with the respondent that climate change, flooding and the need to build a resilient Wales are important matters, particularly in the light of the need to act in a responsible manner in the interests of our future generations.**

**It should be noted however that Natural Resources Wales have not requested the deletion of housing allocations from the Plan on the basis of flood risk. The Plan is considered sound in this regard.**

**The Council has prepared evidence with regards this matter, with a Stage 1 SFCA and a Stage 1b SFCA undertaken and published.**

**The Council is also seeking to respond proactively to comments received at deposit Plan stage by way of focused changes - reference may be made to the Council's responses to comments received under policy CCH4 and paragraph 11.469 of the deposit Plan.**

**As a cross reference note, the Council's response to the promotion of the client's site under representation reference number 4243 can be viewed under the Council's responses to comments received under policy HOM1. Also, the Council's response to the concerns raised in representation reference number 4250 (site sec4/h2) can be viewed under the Council's responses to comments received under policy HOM1 - Housing allocations.**

*Action*

**No change to the Plan.**



**Representation(s)****4231 - RSAI - [4993]****Object****Agent: Lichfields (Mr Arwel Evans) [3166]****Summary:**

On the whole, we are generally concerned that the LPA has allocated sites without the robust evidence that is required by PPW and the Development Plan Manual to demonstrate that the sites are deliverable from a technical and financial perspective. Planning Policy Wales (Edition 10 states) emphasises the importance of deliverable sites. It states that as part of demonstrating the deliverability of housing sites, financial viability must be assessed prior to their inclusion as allocations in a development plan. At the 'Candidate Site' stage of development plan preparation land owners/developers must carry out an initial site viability assessment and provide evidence to demonstrate the financial deliverability of their sites. For sites that are key to the delivery of the plan, a more detailed viability appraisal is required. We are concerned about sites that have been allocated in previous development plans that have not been developed being allocated again without sufficient justification/evidence that they will be delivered this time around. We consider that these sites should not be included again unless robust evidence is presented. We are also concerned that candidate sites have been allocated without any real information being provided about their viability/deliverability. We note the Welsh Government's research into stalled sites prepared by Arcadis. One of the recommendations of the report is for LDPs to identify sites which are deliverable. This requires LDPs to provide evidence of deliverability, viability and to set a trajectory for development. We do not consider that the LDP as drafted currently has gone far enough in demonstrating the deliverability of sites. If the LDP is progressed in its current form then we consider that stalled sites will continue to be evidenced. The Report explained that Carmarthenshire had the highest number of stalled sites (approximately 70) out of all of the Welsh LPAs. The LPA should seek to adopt an LDP which does not risk further stalled sites. Reference is made to rep 4243 where the client's site is promoted. Furthermore, specific site objections have been made to a number of sites in the Plan which have a housing component (along with 1 reserve site) and should be referred to.

*Council's Initial Response*

**Comments noted.**

The Council is confident in the deliverability of those sites allocated. These allocations have been subject to full consideration through the site assessment methodology. As part of this assessment process, site pro formas are prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal.

Where relevant, the Council has prepared responses to representations made to the deposit Plan on allocated sites (most notably - but not exclusively - under policy HOM1-Housing Allocations).

The Council will ensure that sufficient evidence is provided by landowners/developers to prove that allocated sites are able to be delivered within the Plan period. Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

The Council takes a proactive approach to the deliverability of allocated sites and continues to engage with landowners/proponents - notably within the context of the content of Planning Policy Wales (edition 10) and the LDP Manual (edition 3).

Where appropriate however, the Council can respond to deliverability concerns that emerge by way of focused changes.

In regards any need to utilise the reserve sites, this will be closely monitored as part of the monitoring framework of the Plan and reported through the Annual Monitoring Report arrangements.

A response has been prepared by the Council to representation reference number 4268 under policy SG2.

As a cross reference note, the Council's response to the promotion of the client's site under representation reference number 4243 can be viewed under the Council's responses to comments received under policy HOM1.

*Action*

**No change to the Plan.**



*Representation(s)*

**4065 Mr Phil Mann [2574]**

**Object**

**Agent: Mr Stuart Owen [731]**

*Summary:*

We object to Policy SP3 and seek the inclusion of our site as a housing allocation.

*Council's Initial Response*

**The representation seeks to object to SP3 in support of requesting the inclusion of a new site within Penygroes**

**The Council considers that an appropriate and deliverable housing requirement has been set within the deposit Revised LDP to meet its housing needs.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3548 E McGinley [5001]**

**Object**

**Agent: Geraint John Planning Ltd (Geraint John) [4730]**

*Summary:*

This respondent objects claiming that allocating housing commitments with planning permission results in a deficit of additional housing figures being provided (in the examples cited - these are 2 sites in the Bryn, Llanelli - prc2/h20 and prc2/h21). It should be noted that the respondent has confirmed that the deletion of these 2 allocations within policy HOM1 is not sought however. County wide, 60% of the provision is by non allocations (i.e. commitments and/or windfalls) and only 40% by housing allocations. This is questioned as this provision is being made despite the current housing land supply being 3.5 years (under the required 5 years) - source 2019 JHLAS. Figure has been falling for some time - 4.2 in 2017 and 3.8 in 2018. The Plan is heavily dependant therefore on existing sites that have failed to deliver. In the Llanelli / Gwendraeth area the split is around 50/50. Reference made to importance of Llanelli as a growth area - emerging NDF. Therefore, there is an over reliance on windfall/commitments which is objected to. Reference is made to the promotion of the client's site for a housing allocation under reps 3545,3546 and 3547.

*Council's Initial Response*

**Disagree. The housing commitments set out within the table of housing supply reflect those large sites (+5) that have been granted planning permission, and which the Council identifies as making a key contribution to the housing supply during the Plan period, particularly in the short to medium term. In combination with the allocation figure and the windfall allowance, they would support in meeting the housing requirement figure within the Plan.**

*Action*

**No change to the Plan.**

**Representation(s)****3619 Union Tavern Estate [3913]****Object****Agent: Barton Willmore (Joe Ayoubkhani) [646]****Summary:**

The Preferred Strategic Growth Option of providing a housing requirement of 8,835 new homes which results in Policy SP1 identifying a supply of 10,160 new homes is objected to as it would result in the Plan failing the tests of soundness in that it does not fit (by not having regard to national policy and being inconsistent with regional plans) and is not appropriate (by not enabling the delivery of a strategy that is positive and aspirational). By comparison, the growth identified in Policy SP1 would result in a decrease of 6,392 homes when compared with the existing adopted LDP.

**3635 - - John Roberts Family Trust [5018]****Object****Agent: Barton Willmore (Joe Ayoubkhani) [646]****Summary:**

The Preferred Strategic Growth Option of providing a housing requirement of 8,835 new homes which results in Policy SP1 identifying a supply of 10,160 new homes is objected to as it would result in the Plan failing the tests of soundness in that it does not fit (by not having regard to national policy and being inconsistent with regional plans) and is not appropriate (by not enabling the delivery of a strategy that is positive and aspirational). By comparison, the growth identified in Policy SP1 would result in a decrease of 6,392 homes when compared with the existing adopted LDP.

*Council's Initial Response*

**The Population and Household Projection Topic Paper and the evidence contained within the Demographic Forecasts undertaken by Edge Analytics (2018 and 2019) sets out the informing considerations and the justification for the population and household projections for the County.**

**In assessing and identifying the housing requirement for the Plan and in accordance with PPW 10 Para 4.2.6 the WG local authority level projections were utilised as a starting point. Edge Analytics sought to review and assess the appropriateness of the latest WG population and household projections for Carmarthenshire and sought to also provide an alternative suite of demographic and trend evidence to consider.**

**The Council considers that an appropriate and deliverable housing requirement within the deposit Revised LDP factors in the ability to meet the strategic objectives and policies of the Council, retains the young within the county, delivers for the needs of all our communities both urban and rural, and provides the opportunity for job creation, amongst others.**

**Policy SP1 identifies that in meeting the overall requirement of 8,835 dwellings during the plan period, the housing supply is set at 10,160 dwellings (15% general flexibility above the requirement). Some 6,986 residential units will be provided through allocations and those sites considered to be existing commitments. The remainder of the housing requirement will be met through allowances for large and small windfall sites recognising their contribution to housing delivery across the plan area.**

**Consideration will be given as appropriate to the need to amend or update relevant background /topic papers or evidence prior to submission.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3761 Ffos Las Ltd [3885]**

**Object**

**Agent: White Young Green (Mr Rob Mitchell) [2371]**

*Summary:*

Objection to Strategic Policy SP3.

The Policy is heavily reliant on the delivery of sites allocated under Policy HOM1 which have failed to be delivered in the previous LDP.

It has not been robustly evidenced that allocated sites are free, or readily freed, from planning, physical and ownership constraints and be economically viable at the point of the trajectory when they are due to come forward for development, in order to support the creation of sustainable communities" (PPW 10).

The current Deposit LDP fails to identify and allocate sufficient demonstrably deliverable housing sites.

In order for Strategic Policy SP3 to be met it is clear the Council must seek to allocate alternative/additional sites which are: demonstrably sustainable; financially viable; and eminently deliverable.

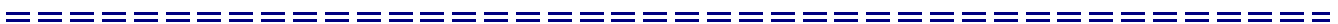
*Council's Initial Response*

**The allocation of sites within the revised LDP for residential purposes have been subject to full consideration through the site assessment methodology. As part of this assessment process detailed site pro formas have been prepared.**

**Further evidential work will be undertaken prior to the examination in to the revised LDP.**

*Action*

**No change to the Plan**





*Representation(s)*

**3938 Pegasus Group (Daniel Millward) [5095]**

**Object**

*Summary:*

Objection to Policy SP3.

We are not convinced the distribution of housing has been properly justified in the context of the ambition to deliver higher levels of economic growth. Our principal concern is that the ambitions to deliver economic growth will be jeopardised by the balanced approach to distributing growth across the county.

Policy SP3 needs to clearly justify the overall quantum of development to be delivered at each settlement tier and then explain how it will be distributed to support the economic aspirations of the plan, alongside its sustainability and community aspirations. Its failure to do so at present is a significant deficiency with the plan that needs to be addressed.

*Council's Initial Response*

**Noted. The respondent notes the level of evidence available in support of the sustainable distribution of housing and economic growth. The council recognises that further information will be required in order to ensure that some of the matters raised are sufficiently clear. Further background evidence will be provided leading into examination.**

**It should however be noted that the LDP is prepared within the context of other plans and strategies including those of the authority, whereby the need to reflect and support rural communities is recognised. Consequently, the Plan provides a balanced approach which recognises and has full regard to national policy provisions in relation to the sustainable location of development, whilst also acknowledging and reflecting the needs of rural communities.**

*Action*

**No change to the Plan**

*Representation(s)*

**3985 Mr Phil Mann [2574]**

**Object**

**Agent: Mr Stuart Owen [731]**

*Summary:*

Objection to SP3 by seeking the inclusion of part of site SR/067/004, and that in not allocating this site for residential development and ensuring removal of an inappropriate use which is detrimental to the amenity and safety of the residents of Gorslas is unsound.

*Council's Initial Response*

**The site does not accord with Stage 2 (Phase 2b) of the Site Assessment Methodology for the following reasons. The site comprises a longstanding allocation, part of which has been developed. The remaining part of the allocation will be deallocated as it comprises an area of ecological value and there are concerns regarding the delivery of the site. There is sufficient and more suitable land available for residential development within the town/village to accommodate its housing needs.**

*Action*

**No change to the Plan**

**Representation(s)****4143 Persimmon Homes West Wales (Stuart Phillips) [5154]****Object****Agent:****WYG PLANNING & ENVIRONMENT (Louise Darch) [598]****Summary:**

After a detailed review of the sites proposed to be allocated for residential development, it remains the case that c.33 % (2,325 of the 6,986 homes) listed at Table 5 of the Deposit LDP as housing allocations have clear long standing deliverability issues, given that they have not successfully come forward during the current plan period between 2006-2021.

There remains a lack of robust assessment of the issues surrounding the rationale for the sites historic failure to be delivered during the plan period and justification for re-allocation. Particularly given that some of these sites have historically been granted planning permission for residential development and have still not progressed during this time. Furthermore 27% (1,903 of the 6,986 homes) continue to remain beyond 5 year aspirations in the Deposit LDP, emphasising a continued lack of confidence from the LPA that the sites are nearing a realistically deliverable state.

Reference can be made to a series of allocated sites objected to by the respondent. Also, the client's site is promoted under representation 4142 (policy HOM1).

**4276 Persimmon Homes West Wales (Stuart Phillips) [5154]****Object****Agent:****WYG PLANNING & ENVIRONMENT (Louise Darch) [598]****Summary:**

After a detailed review of the sites proposed to be allocated for residential development, it remains the case that c.33 % (2,325 of the 6,986 homes) listed at Table 5 of the Deposit LDP as housing allocations have clear long standing deliverability issues, given that they have not successfully come forward during the current plan period between 2006-2021.

There remains a lack of robust assessment of the issues surrounding the rationale for the sites historic failure to be delivered during the plan period and justification for re-allocation. Particularly given that some of these sites have historically been granted planning permission for residential development and have still not progressed during this time. Furthermore 27% (1,903 of the 6,986 homes) continue to remain beyond 5 year aspirations in the Deposit LDP, emphasising a continued lack of confidence from the LPA that the sites are nearing a realistically deliverable state.

Reference can be made to a series of allocated sites objected to by the respondent. Also, the client's site(s) are promoted under representations 4272 and 4275 (policy HOM1). Also, reference may be made to representation 4271 (policy HOM1).

*Council's Initial Response*

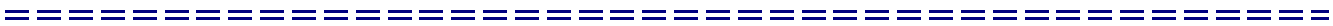
**Disagree.** The respondent has provided no detailed evidence to substantiate their assertion other than referencing the inclusion of sites within previous development plan.

The allocation of sites within the revised LDP for residential purposes have been subject to full consideration through the site assessment methodology. As part of this assessment process detailed site pro formas have been prepared.

As the Plan proceed to examination, Further information around the deliverability of certain sites will be provided as part of the plan's evidence base.

*Action*

**No change to the Plan.**



*Representation(s)*

**3144 Barton Willmore (Joe Ayoubkhani) [646]**

**Object**

*Summary:*

In summary, for the reasons outlined, the housing requirement set in SP 1: Strategic Growth and SP 3: Providing New Homes is objected to and a housing requirement in line with the existing adopted LDP should be utilised.

- 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;
- 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;
- 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.

*Council's Initial Response*

**Disagree. The Population and Household Projection Topic Paper and the evidence contained within the Demographic Forecasts undertaken by Edge Analytics (2018 and 2019) sets out the informing considerations and the justification for the population and household projections for the County.**

**In assessing and identifying the housing requirement for the Plan and in accordance with PPW 10 Para 4.2.6 the WG local authority level projections were utilised as a starting point. Edge Analytics sought to review and assess the appropriateness of the latest WG population and household projections for Carmarthenshire and sought to also provide an alternative suite of demographic and trend evidence to consider.**

**The Council considers that an appropriate and deliverable housing requirement within the deposit Revised LDP factors in the ability to meet the strategic objectives and policies of the Council, retains the young within the county, delivers for the needs of all our communities both urban and rural, and provides the opportunity for job creation, amongst others.**

**Policy SP1 identifies that in meeting the overall requirement of 8,835 dwellings during the plan period, the housing supply is set at 10,160 dwellings (15% general flexibility above the requirement). Some 6,986 residential units will be provided through allocations and those sites considered to be existing commitments. The remainder of the housing requirement will be met through allowances for large and small windfall sites recognising their contribution to housing delivery across the plan area.**

**Consideration will be given as appropriate to the need to amend or update relevant background /topic papers or evidence prior to submission.**

*Action*

**No change to the Plan**



*Representation(s)*

**3855 Welsh Government (Mr Mark Newey) [13]**

**Object**

*Summary:*

Category C - Components of Housing supply- Clarification and presentation  
 The Council has discounted 1717 units from the landbank. The Welsh Government does not object to the principal of this approach which is advocated in the DPM. However, clarification is sought on the status of sites 'discounted' in Appendix 2 of the 'Housing Supply' Topic Paper. Appendix 2 states 'sites that have been omitted from the revised LDP'. However, commentary next to some individual sites suggests they have 'development potential for inclusion in the plan', which is at odds with being discounted in the first place? Clarity is required on the status of Appendix 2 and the LPA should be clear what sites have been discounted, or why sites have been 'added back in' through other means (i.e. windfalls).

*Council's Initial Response*

**Disagree. Appendix 2 of the Housing Supply Paper identifies all large sites that that have been considered, yet omitted from the revised LDP. Whilst the appendix identifies that a number of sites may have the potential for development, their non-inclusion within the revised LDP reflects the lack of certainty and lack of confidence that they will be delivered. To include them would undermine the premise that the LDP should include deliverable sites only. Should some sites identified within this appendix come forward for development, then they will be considered within the windfall allowance, which has been robustly evidenced.**

*Action*

**No change to the Plan**

**Representation(s)****4240 - RSAI - [4993]****Object****Agent: Lichfields (Mr Arwel Evans) [3166]****Summary:**

Development in Llanelli and Burry Port will need to be subject to draft Policy INF4 and the emerging Burry Inlet SPG as they drain into the Llanelli Waste Water Treatment Works. According to the LDP, within this catchment area there are concerns that the connection of foul flows generated by new development introduces the risk of deterioration in the water quality of the Carmarthen Bay and Estuaries European Marine Site (CBEEMS). This is due to the fact that the majority of the sewer system in the Llanelli WWTW area is combined (surface and foul). DCWW has requested that all new development within the catchment be subject to a requirement to undertake compensatory surface water removal from the system as part of the granting of planning permission. Given the above concern and necessary compensation requirements we question the logic of directing so much development to the affected area when better alternatives are available. The settlement of Llangennech lies outside of the catchment in question and therefore we argue that it would be appropriate to reduce the quantum of development in the Burry Inlet area and to provide some of the redistributed quantum of development in the nearby settlement of Llangennech, therefore retaining the quantum of development in Cluster 2. Reference is made to rep 4266 (comments on LDP policy INF4). Reference is also made to rep 4243 where the client's site is promoted.

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***Council's Initial Response*****Comments noted.**

It is noted that the settlement of Llangennech is located outside of the INF4 policy area, however this is just one of a number of considerations that are taken into account in preparing a sound Plan. In this regard, the approach should not be purely 'constraint led' but rather one which provides a land use expression of the corporate direction of travel and allows for the realisation of the Plan's vision and objectives.

A notable consideration in the distribution of development is the importance of the Plan reflecting its evidence base in regards the Role and Function of its settlements.

Paragraph 6.92 of the Role and Function Topic Paper (January 2020) outlines that Llangennech is a self-sufficient village with all the services and facilities appropriate for its scale being within close proximity. In this sense, it plays a vital service centre role within the settlement hierarchy. Its position on the M4 corridor is also recognised. The Council considers that the level of growth earmarked for Llangennech in the Plan is appropriate and deliverable given its supportive role for Llanelli within the wider cluster 2. The Council recognises that Focused Changes are proposed in Llangennech - notably to sites Sec7/h4 and Sec7/h5, but it is considered that the role and function of the settlement is unaffected.

It is noted that those settlements within the INF4 policy / Burry Inlet area are Llanelli and Burry Port and these have a higher quantum of development than Llangennech. This quantum of development is a reflection of the Plan's evidence base, most notably the Role and Function Topic Paper (January 2020).

In noting the cluster based approach underpinning the Plan, the Council emphasises that Llanelli itself remains the focus of development for cluster 2 as the Principal Centre. Paragraphs 6.64, 6.65 and 6.66 of the Role and Function Topic Paper (January 2020) should be referred to in this regard. Notably paragraph 6.66 states that "Future opportunities include the regeneration of the town centre and coastal area will boost and drive socio-economic improvements. It will also enhance the accessibility to homes, services and employment across the South East of Carmarthenshire and beyond".

In regards Burry Port, Paragraph 6.76 of the Role and Function Topic Paper (January 2020) should be referred to. Also most notably paragraph 6.73 states that "many of the sites which were defined previously as windfall sites are being brought into the housing allocation and commitments element of the housing supply components. These sites will support the large scale regeneration opportunity in the harbour area".

In regards the deliverability of sites allocated in Llanelli and Burry Port, their allocation has been subject to full consideration through the site assessment methodology. As part of this assessment process, site pro formas are prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. The allocations identified within the LDP for Llanelli and Burry Port make sufficient provision for the housing needs of those settlements. There is firm evidence of deliverability on these sites. Where appropriate, further evidential work can be undertaken prior to the examination in to the revised LDP. Furthermore, the growth in Llanelli and Burry Port is consistent with the Plan's

evidence base - see above.

As a cross reference note, the Council's response to the promotion of the client's site under representation reference number 4243 can be viewed under the Council's responses to comments received under policy HOM1. Also, the Council's response to the concerns raised in representation reference number 4266 can be viewed under the Council's responses to comments received under policy INF4.

*Action*

No change to the Plan.

*Representation(s)*

**3254 Matthew Utting [2833]**

**Support**

*Summary:*

Strategic Policy SP3 builds on Strategic Policy SP1 by confirming that in order to meet the requirement for 8,835 dwellings over the LDP period, 10,160 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.

*Council's Initial Response*

**Support Welcomed**

*Action*

No change to the Plan

**Paragraph Para 11.86**

*Representation(s)*

**3302 Barratt David Wilson Homes (Mrs Francesca Evans) [4879]**

**Object**

*Summary:*

It is acknowledged that windfalls can make an important contribution to the overall housing requirement for the County. However, in order to ensure the deliverability of the housing requirement then sufficient sites should be identified and allocated to meet this requirement. Windfall sites are unidentified by definition and therefore should therefore form part of the flexibility allowance only.

*Council's Initial Response*

**Disagree. The Council considers that that sufficient land has been allocated for residential development to meet the proposed growth requirement. In respect of windfall sites the council must make an allowance for unforeseen developments which may come forward during the plan period. The flexibility of 15% within the housing supply figure over and above the requirement takes into account the potential for an uplift within all of the housing supply components.**

*Action*

No change to the Plan.



## Policy HOM1: Housing Allocations

### Representation(s)

**3425 Mr G Morris [4979] Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

**Summary:**

Objection to the omission of site SR/106/002 - Land adj B4312 Llansteffan:  
The inclusion of this site within the development limits for Llansteffan would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. The concept is based on a retirement village with ancillary community facilities to serve the residents. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future elderly persons housing for this sustainable community.

**3854 Welsh Government (Mr Mark Newey) [13] Object**

**Summary:**

Category C - Components of Housing supply- Clarification and presentation  
The Welsh Government has the following observations on the housing components and policies in the plan:

\* Policy HOM1: Housing Allocations includes sites with planning permission. The DPM is clear that allocations and commitments should be separated to aid clarity of the plan. If the Council wishes to identify committed housing sites these should be listed in a separate policy and clearly identified on the Proposals Map. Key sites with planning permission, such as PrC1/MU1 West Carmarthen, may require a separate policy as greater evidence is necessary to deliver the site and plan strategy. (See Delivery and Implementation comments.)

### Council's Initial Response

**Disagree. Reference should be drawn to Appendix 7 - Housing Trajectory within the LDP which provides up to date information on sites identified as allocations, and those identified as commitments. Appendix 7 will be a live document which will be updated on an annual basis to coincide within the AMR. It is considered that this form of monitoring is sufficient to identify differences between those sites which are allocations and those which are commitments. Its inclusion into HOM1 would date the Plan on its adoption.**

### Action

**No change to the Plan.**



*Representation(s)*

**3245 Mr Roger Poolman [4883]**

**Object**

*Summary:*

We are led to believe that the site is referred to in the Deposit LDP as a residential site but we believe that there is a recommendation to omit the same from the new Plan. Our clients disagree with the Council's position and believe that the site should continue to be included as one for residential development within this new strategy document.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan**

*Representation(s)*

**3269 Mr Huw Jones [4898]**

**Object**

*Summary:*

I support the inclusion of this current LDP site (SC18/h4) into the next L.D.P 2018-2033. As it is ideal for housing development - particularly in furtherance of SD1 - sustainable villages SP16. do not include this site is in contravention of plan aims - para 10.4 need to sustain rural settlement - reflected in the distribution of housing growth areas.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan**

*Representation(s)*

**3314 Mr Robert Jones [4927]**

**Object**

*Summary:*

Object to the non-inclusion of an existing LDP site at Ffrwdwen, Cwmffrwd, and seeks its inclusion in the revised LDP. I support the inclusion of this 1.1-hectare site in the revised 2018-2033 L.D.P as it represents an environmentally sustainable and minimally intrusive residential development, opportunity that compliments the sustainable development objectives of the LDP. Previously identified as site sc18/h4 in the 2011 deposit LDP plan. This is therefore an objection to policy HOM1 in that the site is not allocated for housing in the Revised LDP. The site reference is AS/039/007

**3289 Mr David Jones [4762]**

**Object**

*Summary:*

Proposed for housing - approximately 1.1 hectares and allocated in the current LDP. Update given on progress in brining the site forward for development - including engagement of planning consultant, meetings, engagement with statutory consultees (inc NRW and DCWW) land agent advice and surveys. There are no technical obstacles, and the site would contribute to the local economy and County's demographic structure. The land is ripe for development and also sustainable located - public transport links and cycle path cited. This is therefore an objection to policy HOM1 as the site is not allocated for housing in deposit Revised LDP. Site reference is AS/039/007

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan**



*Representation(s)*

**3246 Kevin & Wendy Duggan [2800]**

**Object**

*Summary:*

SR/070/001 Opening up our land for building affordable housing, will allow us to apply for planning on our two barns, one as a family home and the other as a holiday rental, bringing tourism to the area this would also help us to maintain the woodland and fields that we own helping the environment.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan**

*Representation(s)*

**3386 Mr A.R Llewellyn [4957]**

**Object**

**Agent: CDN Planning (Mr Graham Carlisle) [5017]**

*Summary:*

Objection to the exclusion from allocation of a site in Trimsaran. The site is allocated for housing development in the currently adopted LDP (T3/4/h7). The land in question is an attractive residential site. It has a good direct access from the main road linking Trimsaran to Llanelli and it is in a sustainable location being close to the facilities in Trimsaran, including the nearby junior school. It is also on a regular bus route to Llanelli.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan**

*Representation(s)*

**4186 Mr C Hurley [4688]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

A comprehensive case for the allocation of the land for residential development purposes and it should also be read in conjunction with the accompanying supporting information and indicative site layout plan. An accompanying layout drawing has taken account of all the potential assets and constraints of the site and demonstrates that it is capable of delivering 18 houses in a deliverable and sustainable manner. The site is capable of accommodating detached and semi detached, two-storey houses to replicate and being reflective of the existing form and density of residential development in the immediate locality. With the Site having no access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints, its delivery if allocated is assured. Combined therefore with its locational characteristics, the site represents a sustainable Alternative Site for future housing development. Objection under policy HOM1 as land is not allocated. Site reference AS/016/021, not previously a candidate site. Reference can be made to 8 objections about the deliverability of allocated sites - including 3381. Those 8 Housing allocations should be removed from the plan and units redistributed to Alternative Sites, of up to circa 20-25 units such as this one as there is clear evidence that such moderately-sized sites are far more likely to be brought forward and developed in full by regional housebuilders given that construction and development costs are more likely to be viable in relation to house sales and the general housing market in this part of Carmarthenshire.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The site does not accord with Stage 2 (Phase 2b) of the Site Assessment Methodology for the following reasons: there are concerns that the development of the site would be contrary to general planning principles in that it would contribute towards the unacceptable coalescence of 2 distinctly separate parts of the existing built form (Pembrey and Burry Port). Also, there is sufficient and more suitable land available for residential development within the settlement to accommodate its housing need.**

**(Cross referencing note - the Council's response to representations made by the respondent seeking deletion of allocated housing sites from the Plan - including rep number 3381 - site sec4/h2- can be viewed under the Council's HOM1 policy responses - housing allocations)**

*Action*

**No change to the Plan.**



*Representation(s)*

**3204 Mr & Mrs Gary & Lynne Edwards [4671]**

**Object**

*Summary:*

The site reference is AS/016/019. Plan is sound but is seeking new site. The site is promoted as a natural extension of Dolau Fan Road Housing Estate for 10 self build plots. The land is derelict. All services are available and adequate with existing access. A Bus service is in operation and the land is for sale. Other potential land uses discussed are donation of land to cemetery, whilst solar, wind, water power are also highlighted. The main thrust of the representation is for housing however. This is therefore an objection to policy HOM1 in that the land is omitted as a housing allocation. Reference may be made to representation 3205. Supplemental information on access and land ownership provided in addition.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The site does not accord with Stage 2 (Phase 2b) of the Site Assessment Methodology for the following reasons - Development of the site for housing will be contrary to general planning principles (unacceptable extension) and would have a detrimental impact on the character and setting of the settlement or its features. In this regard, it is considered that allocating for housing would lead to an illogical and unnecessary eastern departure from the established urban form of the Dolau Fan area. Also, there is sufficient and more suitable land available for residential development within the settlement to accommodate its housing need. For other potential uses highlighted in the representation - these would be for consideration against the Plan's policy framework.**

**(Cross referencing note - the Council's response to representation reference number 3205 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**



*Representation(s)*

**4118 Mr B.O. Beynon [5011]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

The proposals under this Representation seek the addition of circa 46 residential units to the overall housing supply of Pembrey/Burry Port, which forms a local service centre, being part of the Llanelli Cluster as defined within the draft LDP. An indicative site layout plan is provided, and the original candidate site submission is attached. The site has been promoted as a natural extension to the Garreglwyd allocation in the LDP - Site SeC5/h1, which is being constructed alongside, and is a development of semi-detached, two-storey units, which complement and resemble established local-authority-built houses in this part of Pembrey (SeC5/h1 to be completed by 2022). This will not appear at odds to the prevailing spatial pattern of development in Pembrey. The locality has numerous examples of modern cul-de-sac development being completed at backland locations, which in turn, advocates that the form of development proposed at Garreglwyd is no different, resulting in it being respectful to the character and setting of the locality. This is an objection to policy HOM1 in that candidate site SR/016/017 is not allocated for housing. Site reference - AS/016/017. Reference can be made to 8 objections about the deliverability of allocated sites - including rep 4123. Those 8 Housing allocations should be removed from the plan and units redistributed to Alternative Sites, of up to 50 units such as this one as there is clear evidence that such moderately-sized sites are far more likely to be brought forward and developed in full by regional housebuilders given that construction and development costs are more likely to be viable in relation to house sales and the general housing market in this part of Carmarthenshire.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**(Cross referencing note - the Council's response to representations made by the respondent seeking deletion of allocated housing sites from the Plan - including rep number 4123 - site sec4/h2- can be viewed under the Council's HOM1 policy responses - housing allocations)**

*Action*

**No change to the Plan.**



*Representation(s)*

**3546 E McGinley [5001]**

**Object**

**Agent: Geraint John Planning Ltd (Geraint John) [4730]**

*Summary:*

A detailed case for the allocation of the site is set out and should be read in conjunction with the previous candidate site submission. The site is immediately adjacent to development limits and a proposed housing allocation (prc2/h21) in the deposit Plan. Reference is made to the Council's assessment of the candidate site previously which is disagreed with. Entire site in ownership of promoter. This is a logical expansion of Bryn to the east and the site is readily available. This is presented as an option for 41 dwellings. Previously developed land. It is sustainably located and constraint free. Objection under HOM1 to non allocation of candidate site SR/086/039, site reference is AS/086/039. This was not the preferred option at candidate site stage to that discussed under rep 3545. Further site options set out in reps 3545 and 3547 should be referred to.

**3545 E McGinley [5001]**

**Object**

**Agent: Geraint John Planning Ltd (Geraint John) [4730]**

*Summary:*

A detailed case for the allocation of the site is set out and should be read in conjunction with the previous candidate site submission. The site is immediately adjacent to development limits and a proposed housing allocation (prc2/h21) in the deposit Plan. Reference is made to the Council's assessment of the candidate site previously which is disagreed with. Entire site in ownership of promoter. This is a logical expansion of Bryn to the east and the site is readily available. This is presented as an option for 210 dwellings. Part of the site is previously developed land. It is sustainably located and constraint free. Objection under HOM1 to non allocation of candidate site SR/086/038, site reference is AS/086/038. This was a preferred option at candidate site stage to that discussed under rep 3546. Further site options set out in reps 3546 and 3547 should be referred to.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**(Cross referencing note - the Council's response to representation reference number 3547 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**



*Representation(s)*

**3547 E McGinley [5001]**

**Object**

**Agent: Geraint John Planning Ltd (Geraint John) [4730]**

*Summary:*

A detailed case for the allocation of the site is set out. Reference is made to previous a candidate site submission which was made in relation to options 1 and 2 previous (see reps 3545 and 3546) as background. Reference is made to the Council's assessment of those candidate site previously which is disagreed with. The site is immediately adjacent to development limits and a proposed housing allocation (prc2/h21) in the deposit Plan. This is presented as an option for 96 dwellings. Part of the site is previously developed land. It is sustainably located and constraint free. Contractual arrangements are in place between the landowner and a developer via an option agreement. The site is being promoted by an active, locally based SME housebuilder. Reference is also made to the emerging NDF. Objection under HOM1 to non allocation of the site under reference is AS/086/080. Further site options set out in reps 3545 and 3546 should be referred to.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. It is noted that this representation proposes a different option to those in representations 3545 and 3546. The site does not accord with Stage 2 (Phase 2b) of the Site Assessment Methodology for the following reasons - the development of the site would be contrary to general planning principles in that it would contribute towards the coalescence of 2 distinctly separate parts of the existing built form (Bryn and Llangennech). It is noted that the site is visibly prominent in this regard.**

**(Cross referencing note - the Council's response to representation reference numbers 3545 and 3546 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**

*Representation(s)*

**3921 Mr A Richards [4122]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

This site will provide a second phase to adjoining site SeC7/H1 - clients are confident that SeC7/H1 will be implemented by 2023. Representation seeks the addition of circa 7 residential units to the overall housing supply of Llangennech, which forms part of the principal service centre centred upon the Llanelli Cluster as defined within the deposit LDP. The indicative proposals to construct 7 dwellinghouses will not appear at odds to the prevailing spatial pattern of development in Llangennech. The locality has numerous examples of modern cul-de-sac development being completed at backland locations, which in turn, advocates that the form of development proposed at Aber Lluchwr is no different, resulting in it being respectful to the character and setting of the locality. This is a location where housing proposals are deliverable, assisting to meet housing needs in this part of the Llanelli Cluster. An extract of the indicative site layout plan for this site is provided and the candidate site report resubmitted. This is an objection to policy HOM1 in that candidate site SR/086/076 is not allocated for housing. Site reference - AS/086/076. Refer to rep 3923 also.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**(Cross referencing note - the Council's response to representation reference number 3923 can be viewed under the Council's HOM1 policy responses - housing allocations)**

*Action*

**No change to the Plan.**

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*Representation(s)***4013 Stradey Estate (Mr Edward Mansel Lewis) [5122]****Object*****Agent: Geraint John Planning Ltd (Mr Luke Grattarola) [685]******Summary:***

Objection to policy HOM1 in that that candidate site SR/086/036 was not allocated. The land lies immediately adjacent to the settlement boundary for Llanelli. The development of the site would not unduly damage the character of the surrounding area, due to location in settlement and strong association with the settlement of Furnace, and Llanelli. The site is located within close association and connection to Furnace, and town centre of Llanelli, which provides a range of services and facilities within convenient walking distance (which would facilitate sustainable growth of the settlement). The sustainability and accessibility credentials of the site lend themselves to supporting residential development at this location - a bus stop is located within 150m of the site. The land is not identified as being of any special landscape / nature conservation / ecology interest - it is not afforded any such protection status within the current LDP. It is considered that the inclusion of this land for residential development will significantly assist the Local Authority in meeting their housing needs provision. This is the 'next' logical outward expansion of Furnace as the site is bound by residential development on the southern and western boundaries. Furthermore, the quarry site (h10) is located to the north-east of the promoted site and would link well with that expansion of the settlement. The site reference is AS/086/036.

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**4012 Stradey Estate (Mr Edward Mansel Lewis) [5122]****Object*****Agent: Geraint John Planning Ltd (Mr Luke Grattarola) [685]******Summary:***

Objection to policy HOM1 in that that candidate site SR/086/035 was not allocated. The land lies immediately adjacent to the settlement boundary for Llanelli. The development of the site would not unduly damage the character of the surrounding area, due to location in settlement and strong association with the settlement of Furnace, and Llanelli. The site is located within close association and connection to Furnace, and town centre of Llanelli, which provides a range of services and facilities within convenient walking distance (which would facilitate sustainable growth of the settlement). The sustainability and accessibility credentials of the site lend themselves to supporting residential development at this location - a bus stop is located within 150m of the site. The land is not identified as being of any special landscape / nature conservation / ecology interest - it is not afforded any such protection status within the current LDP. It is considered that the inclusion of this land for residential development will significantly assist the Local Authority in meeting their housing needs provision. This is the 'next' logical outward expansion of Furnace as the site is bound by residential development on the southern and western boundaries. Furthermore, the quarry site (h10) is located to the north-east of the promoted site and would link well with that expansion of the settlement. The site reference is AS/086/035.

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4011 Stradey Estate (Mr Edward Mansel Lewis) [5122]

Object

**Agent: Geraint John Planning Ltd (Mr Luke Grattarola) [685]**

**Summary:**

Objection to policy HOM1 in that that candidate site SR/086/032 was not allocated. The land lies immediately adjacent to the settlement boundary for Llanelli. The development of the site would not unduly damage the character of the surrounding area, due to location in settlement and strong association with the settlement of Furnace, and Llanelli. The site is located within close association and connection to Furnace, and town centre of Llanelli, which provides a range of services and facilities within convenient walking distance (which would facilitate sustainable growth of the settlement). The sustainability and accessibility credentials of the site lend themselves to supporting residential development at this location - a bus stop is located within 150m of the site. The land is not identified as being of any special landscape / nature conservation / ecology interest - it is not afforded any such protection status within the current LDP. It is considered that the inclusion of this land for residential development will significantly assist the Local Authority in meeting their housing needs provision. This is the 'next' logical outward expansion of Furnace as the site is bound by residential development on the southern and western boundaries. Furthermore, the quarry site (h10) is located to the north-east of the promoted site and would link well with that expansion of the settlement. The site reference is AS/086/032.

**Council's Initial Response**

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**Action**

**No change to the Plan.**



*Representation(s)*

**4015 Stradey Estate (Mr Edward Mansel Lewis) [5122]**

**Object**

**Agent: Geraint John Planning Ltd (Mr Luke Grattarola) [685]**

*Summary:*

Objection to policy HOM1 in that site ref AS/086/082 is not allocated (not a candidate site - alternative 1). Accessible via clos Pen Y Fai, via an access owned by the site promoter, and could allow for a small-scale residential opportunity. This 'rounding' off of the settlement would be a logical extension to the settlement in this location, not least as the proposed site would have built form on the western and southern boundaries. Noting the boundaries, these are natural hedgerows and the southern and south-eastern boundaries have a number of large trees which act as natural boundaries. This smaller option would comprise a site capacity of circa 12 dwellings. This density and quantum of built form would allow the settlement to 'round off' in the area and would allow a lower density proposal on the rural edge of the settlement. This low-volume of built form would also have no material impact on the highway network. A highway technical note has been prepared specifically for this site. Reference is made to representations 4011,4012 and 4013.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The site does not accord with Stage 2 (Phase 2b) of the Site Assessment Methodology for the following reasons - Development would lead to an unnecessary encroachment beyond the development limits. Development of the site for housing will be contrary to general planning principles (unacceptable extension) and would have a detrimental impact on the character and setting of the settlement or its features. In this regard, it is considered that allocating for housing would lead to an illogical and unnecessary eastern departure the from the established urban form of the Pen Y Fai area. The nature of the highway infrastructure is a notable developmental consideration in this part of Llanelli, albeit the proponent has submitted a transport assessment to support this proposal. There is sufficient and more suitable land available for residential development within the settlement to accommodate its housing need.**

**(Cross referencing note - the Council's response to representation reference numbers 4011,4012 and 4013 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**



*Representation(s)*

**4016 Stradey Estate (Mr Edward Mansel Lewis) [5122]**

**Object**

**Agent: Geraint John Planning Ltd (Mr Luke Grattarola) [685]**

*Summary:*

Objection to policy HOM1 in that site ref AS/086/083 is not allocated (not a candidate site - alternative 2). Given the Quarry's allocation to the north-east, the below could be a suitable alternative. This would be 'rounding off' the settlement, and could look to utilise a shared access opportunity with the adjacent promoter of the quarry site. This parcel of land, circa 6ha in size could crudely look to provide (at a notional 20dph density) 100 - 120 units. Reference is made to representations 4011,4012 and 4013.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The site does not accord with Stage 2 (Phase 2b) of the Site Assessment Methodology for the following reasons - Development would lead to an unnecessary encroachment beyond the development limits. Development of the site for housing will be contrary to general planning principles (unacceptable extension) and would have a detrimental impact on the character and setting of the settlement or its features. In this regard, it is considered that allocating for housing would lead to an illogical and unnecessary eastern departure the from the established urban form of the Pen Y Fai area. The nature of the highway infrastructure is a notable developmental consideration in this part of Llanelli. Also, there is sufficient and more suitable land available for residential development within the settlement to accommodate its housing need.**

**(Cross referencing note - the Council's response to representation reference numbers 4011,4012 and 4013 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**

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*Representation(s)*

**4017 Stradey Estate (Mr Edward Mansel Lewis) [5122]**

**Object**

**Agent: Geraint John Planning Ltd (Mr Luke Grattarola) [685]**

*Summary:*

Objection to policy HOM1 in that site ref AS/086/084 is not allocated (not a candidate site - alternative 3). Whilst it is acknowledged that Pen Y Fai Lane has its issues, this alternative option would continue the 'ribbon development' theme along Pen Y Fai Lane, and could offer road improvements for vehicle and pedestrian refuge. The alternative, at 0.4 ha in size could provide circa 8 dwellings which would replicate the density and character of generous plot sizes in the area. Improvements to the road could also be made by allowing for passing bays etc which would improve highway and pedestrian safety. Reference is made to representations 4011,4012 and 4013.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The site does not accord with Stage 2 (Phase 2b) of the Site Assessment Methodology for the following reasons: Whilst there are concerns that the development could result in a detrimental impact on the character and setting as this is a large and prominent infill proposal, the primary concern is the nature of the highway infrastructure which is a notable developmental consideration in this part of Llanelli. Also, there is sufficient and more suitable land available for residential development within the settlement to accommodate its housing need.**

**(Cross referencing note - the Council's response to representation reference numbers 4011,4012 and 4013 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**

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*Representation(s)*

**4044 Mrs D Davies [4075]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

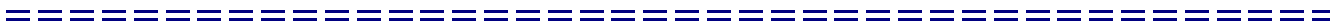
The proposals under this Representation seek the addition of circa 7 residential units to the overall housing supply of Hendy & Fforest, which forms part of the principal service centre centred upon the Llanelli Cluster as defined within the deposit LDP. The indicative proposals to construct circa 7-10 dwellinghouses will not appear at odds to the prevailing spatial pattern of development in Hendy and Fforest. The locality has numerous examples of modern cul-de-sac development being completed at backland locations, which in turn, advocates that the form of development proposed at Oaklands is no different, resulting in it being respectful to the character and setting of the locality. This is a location where housing proposals are deliverable, assisting to meet housing needs in this part of the Llanelli Cluster. An extract of the indicative site layout plan for this site is provided and the candidate site report resubmitted. This is an objection to policy HOM1 in that candidate site SR/069/014 is not allocated for housing. Site reference - AS/069/014

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**





*Representation(s)*

**4073 Mr W R Thomas [5060]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Reference is made to the Council's concerns with regards to the proposed Candidate site SR/086/070 in regards flooding. As a result, the site area has been revised to exclude the southern portion of the grazing field which falls within the Zone C2. The locality has numerous examples of modern cul-de-sac development being completed at backland locations, which in turn, advocates that the form of development proposed at Gwaelod-y-Maes is no different, resulting in it being respectful to the character and setting of the locality. Reference is made to the position with Llangenench WWTW investment also. This is an objection to policy HOM1 in that site AS/086/085 is not allocated (revised site area from the original candidate site). Indicative site layout and original candidate site submission provided. Reference is made to representation 3801.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The site does not accord with Stage 2 (Phase 2b) of the Site Assessment Methodology for the following reasons: The development of the site would be contrary to general planning principles due to it being an unacceptable extension to the settlement. In this regard, the emphasis in this plan period should be on delivering allocation SeC7/h4 - refer to representation 3801 - policy HOM1 housing allocations. The submission of an amended site area is as a means to counter concerns on DAMs C2 zone is noted. Also, there is sufficient and more suitable land available for residential development within the settlement to accommodate its housing need.**

**(Cross referencing note - the Council's response to representation reference number 4072 can be viewed under the Council's HOM1 policy responses - housing allocations)**

*Action*

**No change to the Plan.**



*Representation(s)*

**4096 Mr & Mrs K & T Jones [4052]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

The proposals under this Representation seek the addition of circa 100 residential units to the overall housing supply of Llanelli, which the Bynea / Bryn locality forms part of the Llanelli Cluster as defined within the draft LDP. An indicative site layout plan is provided, and the original candidate site submission is attached. This will not appear at odds to the prevailing spatial pattern of development in Llanelli. The locality has numerous examples of modern cul-de-sac development being completed at backland locations, which in turn, advocates that the form of development proposed at Pencoed Farm is no different, resulting in it being respectful to the character and setting of the locality. It is abundantly clear that this area has a good market demand, where prospective homebuyers are attracted to this part of eastern Llanelli to live. It is ironic that the Council seek to promote locations where housing supply can be effectively delivered, but when presented with such Candidate Sites, they subsequently are fearful that more development would somehow be detrimental to the locality. The development off the eastern side of Pendderi Road would complement the long-since completed "Bryn Emrallt" which lies to the immediate north-west of the Representation Site, and is another example of high market demand of sites in this locality being completed and wholly delivered. This is an objection to policy HOM1 in that candidate site SR/086/071 is not allocated for housing. Site reference - AS/086/071. Reference can be made to 8 objections about the deliverability of allocated sites - including rep 4097. Those 8 Housing allocations should be removed from the plan and units redistributed to Alternative Sites, of up to 100 units such as this one. There is clear evidence that such moderately-sized sites are far more likely to be brought forward and developed in full by regional housebuilders given that construction and development costs are more likely to be viable in relation to house sales and the general housing market in this part of Carmarthenshire.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**(Cross referencing note - the Council's response to representations made by the respondent seeking deletion of allocated housing sites from the Plan - including rep number 4097 - site prc2/h15 - can be viewed under the Council's HOM1 policy responses - housing allocations)**

*Action*

**No change to the Plan.**



*Representation(s)*

**4397 Phyllis Davies [2614]**

**Object**

*Summary:*

The site has been waiting for 45 years to be placed in the development Plan. Drainage/ sewage infrastructure in place for 45 years, also attractive views over Llanelli. Reference made to Council fields adjacent. Access via Dimpeth Lane not Pentrepoeth. Close to schools, hospital - no traffic jams or pollution - also not a flood plain - eg South Llanelli (people need a choice). Last development in this part of the town was in the 60's & 70's - Swiss Valley - long since completed. This is no longer neat and tidy farm land as it was years ago - overgrown etc. Further detailed information provided - including Dwr Cymru Welsh Water information. Reference is also drawn to climate emergency declared by the County Council and the fact that this site has strong attributes in this regard given location close to services etc. This is an objection under policy HOM1 to non allocation of candidate site SR/086/004 (site reference AS/086/004).

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4529 Mr Martin Beynon [3555]**

**Object**

*Summary:*

The deposit plan has excluded the site. I made representations for including this site previously and do not wish to repeat those comments here but instead to respond to the Stage 2a initial detailed site assessment to which I respond to as follows: - (1) 'Development would lead to a sporadic form of development' - The school provides a suitable boundary for the village's development limit and should thereby provide an opportunity for much needed infill development. This site falls within that infill area. With Llanedi being categorised as a "Sustainable Village", greater provision for housing within the village is justified and this plot would make a suitable contribution. The suitability of this site for development was outlined in my previous representation, which addressed the tests set in in your Authority's Stage 2b assessment such as accessibility and infrastructure & utilities. (2) There is a lack of certainty in terms of site ownership. The ownership of this land is registered at HM Land Registry. The owner is willing to negotiate a sale of this land to a suitable developer to bring forward within this plan period. Llanedi is a popular residential village with previous allocations for housing being developed or due to commence. Property values in Llanedi ensure that residential development is viable and sufficient developer interest exists. Consequently, viability and deliverability tests can be met. This is an objection to the non allocation of this site under policy HOM1 - site reference AS/084/003.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site, albeit land ownership issues and intent are confirmed by the respondent. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No Change to the Plan.**



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*Representation(s)***3664 N, L & S Hammer, Casey & Evans [5030]****Object*****Agent: Aled Thomas Planning Design Ltd (Mr Aled Thomas) [3225]******Summary:***

We would like the Authority and the Planning Inspector to re-think its reason for not including this land and urge them to re-read our submitted evidence with our first submission. A copy of the candidate site report is provided - this concludes by stating that this site is believed to be a perfect site for inclusion within the Local Development Plan to allow for further residential properties within the locality for local people. This is an objection under policy HOM1 to non allocation of CS/086/031 - site ref AS/086/031.

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**3776 Mrs Sandra Y Evans [601]****Object*****Summary:***

There is no issue with this site with regards stage 2a constraints - including nature conservation, cultural heritage designations or TAN 15 flood risk zones. Also, I believe it is possible to overcome or mitigate the constraints put forward in the Initial Detailed Site Assessment comments, "A notable deliverability concern is highway access, with reference given to the lack of pedestrian facilities and limited visibility in this regard. The site will remain outside of the development limits." There is currently a planning application which is due for a decision on 27/3/20 which we are hopeful will be approved. If this is the case the planning agreement constraints submitted by the Highways & Transport Division Environment Department as part of the Consultation process will overcome and mitigate the deliverability concern of highway access, lack of pedestrian facilities and limited visibility. (Direct quotes from the Highways consultation document are provided). Therefore I feel the concerns have been addressed and being in a housing high demand area in the heart of Felinfoel the site should be included in the development limits. This is an objection under policy HOM1 to non allocation of CS/086/031 - site ref AS/086/031.

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*Council's Initial Response*

The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non-inclusion set out within the Sites Assessment Table.

However there is now additional information available that requires the above assessment to be reviewed, notably the granting of planning permission S/39676 on the land adjacent to the site.

Reference is made to the Council's initial assessment in this regard, notably in terms of highways/access concerns (refer to Sites Assessment Table).

This new assessment of the site is undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.

The site does not accord with Stage 2b of the Site Assessment Methodology for the following reason : development of the site have a detrimental impact on the character and setting of the settlement or its features. The site's allocation for housing would raise concerns in regards the hedgerow and trees that run along the site boundary and the site levels are also noted.

However, a further assessment of the site based on a smaller site area has also been undertaken.

This further assessment of the amended / reduced site area is undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.

The site does not accord with Stage 2a of the Site Assessment Methodology for the following reason : the site accommodate 5 or more dwellings.

It is considered that development of this smaller site area will not have a detrimental impact on the character and setting of the settlement or its features

As a result, a small portion of the site will be included within the development limits in recognition of its development potential for 1-2 units and the site will not be allocated. This smaller site area than which is requested recognises the importance of the retention of the hedgerow and trees that run along the site boundary and to partially screen the development from the surrounding area. The levels are also noted. Trees may need root protection areas and there is a likely requirement for surveys (eg dormice).

In this regard, the site will require detailed consideration of a range of matters as part of any future planning application.

*Action*

Amend the Plan (focused change) - part of the site to be included within development limits.



*Representation(s)*

**3105 Mr S Cooper [4829]**

**Object**

*Summary:*

The following Submissions have been made to the Local Authority to amend the Development Plan for exclusion and should be rejected: SR/067/015 - CA0892

**3451 Mr H Davies [4985]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of site SR/097/004.  
The inclusion of this site within the development limits for Llangynog would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper.**

**The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)***3853 Estate of W J Thomas [5078]****Object****Agent: Geraint John Planning Ltd (Geraint John) [4730]***Summary:*

Objects to the Deposit LDP on the grounds that the site isn't included as an allocation and is set to be delivered. Outline Application S/38518 for residential development of up to 20 dwellings is under consideration by the Council, with just one outstanding matter before being heard at Planning Committee. This is an objection to policy HOM1 site reference AS/086/081 (not previously a candidate site - note it is white land within development limits). The site is a highly suitable location for housing, and for inclusion as such within the emerging LDP. It lies within the settlement boundary for Llanelli, which is a defined Growth Area. It is currently afforded a residential allocated status within the currently adopted LDP, and this should be considered as the baseline for the site. The development of the site would not unduly damage the character of the surrounding area, due to the site's location within an existing residential area. The site benefits from a close association and connection with the services and facilities provided within Llwnhendy, which are situated within convenient walking distance (which would facilitate sustainable growth of the settlement). The sustainability and accessibility credentials of the site lend themselves to supporting residential development at this location - several bus stops are located immediately north of the site on Heol Llwynhendy. The land is not identified as being of any special landscape / nature conservation / ecology interest - it is not afforded any such protection status within the current LDP. It is considered that the inclusion of this land for residential development will assist the Local Authority in meeting their housing needs provision. The site is wholly deliverable and can realistically come forward within the early years of the Plan period.

*Council's Initial Response*

**The site (in the form of Adopted LDP allocation GA2/h37) has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site (see paragraph 2 below). The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**It is noted that an outline residential application is in place at the time of writing. However, there remains insufficient evidence to identify when the site will be delivered. The site will remain within development limits due to its position in the urban form.**

*Action*

**No change to the Plan.**

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**Representation(s)**

**3514 Mr J W Philips [4998]**

**Object**

**Agent: Nicole Jones (Nicole Jones) [704]**

**Summary:**

Objection to Policy HOM1. Seeking the inclusion of a site in Cwmffrwd.

The proposal is a small parcel of land located partially behind some development with access from the main road A484 through Cwmffrwd. The site is set inland away from any coastal flooding and it lies outside any flood risk area.

The site is not located close or within any nature conservation area, and there is a wide access point off the A484 which would be used for the main access.

All services: mains water supply, foul sewer, electricity and high-speed electronic communications networks, are in close proximity to the site.

**Council's Initial Response**

**It is considered that there are more suitable sites available within Cwmffrwd to meet the housing need within the village.**

**Action**

**No change to the Plan**

*Representation(s)*

**3543 Mr & Mrs Williams [2858]**

**Object**

**Agent: Nicole Jones (Nicole Jones) [704]**

*Summary:*

Objection to the exclusion of a site within the Deposit LDP:

The site lies just outside the local development plan of Four Roads, which the access plots included in the existing LDP. Residential development will sit nicely next to the existing dwellings.

All surrounding roads would be able to cope with the additional traffic without the need of any improvements.

All necessary services are in close proximity.

There is sufficient space for a double access onto the main road and an additional access can be achieved via the new estate roads.

The number of children in the surrounding primary school are decreasing steadily. A new development would safeguard the future of the school and the communities.

*Council's Initial Response*

**Four Roads has been classified as a settlement within Tier 4 of the settlement hierarchy and therefore any site proposal will be considered under policies set out within the revised LDP, most notably Policy HOM3.**

*Action*

**No change to the Plan**



*Representation(s)*

**3588 E McGinley [5001]**

**Object**

**Agent: Geraint John Planning Ltd (Geraint John) [4730]**

*Summary:*

Objection to the exclusion of part of site SR/078/004 from allocation within the Plan.

The northern part of the site was considered suitable for allocation of residential development.

The inclusion of the southern part of the site would comprise a logical extension to the settlement. This would provide sufficient land for the inclusion of circa 40 dwellings along with the inclusion of land to facilitate the Sustainable Urban Drainage (SuDs) requirements which have recently been enforced by national government.

This site could make a meaningful and short-term contribution to the housing delivery in Llanddarog and the surrounding areas and should be re-considered as expanding the allocation to allow for a larger development area.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**The land which has been allocated provides a suitable and sympathetic development within Llanddarog, which meets the housing need within the village. It is considered that the allocation of further land is not needed to accommodate new growth.**

*Action*

**No change to the Plan.**



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*Representation(s)***3206 Mr Derrick Phillips [812]****Object***Summary:*

Object to the non-inclusion of SR/039/001. The land that forms part of this candidate site submission adjoin the existing built form of Cwmffrwd and is available for delivery within the short term. The development of this site would assist in delivering much needed housing, including affordable housing and would be fully compliant with the sustainable principles that underpin national policy. There are no insurmountable constraints. Finally and perhaps more significantly having regard to the sub five year housing land supply within Carmarthenshire, the development would not incorporate any abnormal costs that would restrict its delivery and it would be fully policy compliant and therefore be capable of delivering significant infrastructure and benefit to the local economy.

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**3207 Mr Derrick Phillips [812]****Object***Summary:*

Object to the non-inclusion of SR/039/002. The land that forms part of this candidate site submission adjoin the existing built form of Cwmffrwd and is available for delivery within the short term. The development of this site would assist in delivering much needed housing, including affordable housing and would be fully compliant with the sustainable principles that underpin national policy. There are no insurmountable constraints. Finally and perhaps more significantly having regard to the sub five year housing land supply within Carmarthenshire, the development would not incorporate any abnormal costs that would restrict its delivery and it would be fully policy compliant and therefore be capable of delivering significant infrastructure and benefit to the local economy.

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**3208 Mr Derrick Phillips [812]****Object***Summary:*

Object to the non-inclusion of SR/039/003. The land that forms part of this candidate site submission adjoin the existing built form of Cwmffrwd and is available for delivery within the short term. The development of this site would assist in delivering much needed housing, including affordable housing and would be fully compliant with the sustainable principles that underpin national policy. There are no insurmountable constraints. Finally and perhaps more significantly having regard to the sub five year housing land supply within Carmarthenshire, the development would not incorporate any abnormal costs that would restrict its delivery and it would be fully policy compliant and therefore be capable of delivering significant infrastructure and benefit to the local economy.

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**3209 Mr Derrick Phillips [812]****Object***Summary:*

Object to the non-inclusion of SR/039/004. The land that forms part of this candidate site submission adjoin the existing built form of Cwmffrwd and is available for delivery within the short term. The development of this site would assist in delivering much needed housing, including affordable housing and would be fully compliant with the sustainable principles that underpin national policy. There are no insurmountable constraints. Finally and perhaps more significantly having regard to the sub five year housing land supply within Carmarthenshire, the development would not incorporate any abnormal costs that would restrict its delivery and it would be fully policy compliant and therefore be capable of delivering significant infrastructure and benefit to the local economy.

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*Council's Initial Response*

The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.

There is sufficient and more suitable land available within the locality to meet the county's housing need.

*Action*

**No change to the Plan.**



*Representation(s)*

**3597 Mr B.O. Beynon [5011]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

The proposals under this Representation seek the addition of circa 80 residential units to the overall housing supply of Kidwelly, which forms a local service centre, being part of the Llanelli Cluster as defined within the draft LDP. An indicative site layout plan is provided, and the original candidate site submission is attached. An application for Approval of Reserved Matters is currently under preparation to construct a total of 93 houses on Site SeC3/h4, extensive supporting material taking time to compile but our clients are aiming to be formally submitting such detailed proposals for approval to the Local Planning Authority in May 2020 and confident that that allocation will be implemented by 2024. This representation Site will lead from that development to provide a second phase. This will not appear at odds to the prevailing spatial pattern of development in Kidwelly. The locality has numerous examples of modern cul-de-sac development being completed at backland locations, which in turn, advocates that the form of development proposed at Holloway Farm is no different, resulting in it being respectful to the character and setting of the locality. This is an objection to policy HOM1 in that candidate site SR/074/011 is not allocated for housing. Site reference - AS/074/011. Reference can be made to 8 objections about the deliverability of allocated sites - including rep 3624. Those 8 Housing allocations should be removed from the plan and units redistributed to Alternative Sites, of up to 100 units such as this one as there is clear evidence that such moderately-sized sites are far more likely to be brought forward and developed in full by regional housebuilders given that construction and development costs are more likely to be viable in relation to house sales and the general housing market in this part of Carmarthenshire.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**There is sufficient land available for development within Kidwelly to meet its housing needs for the plan period.**

*Action*

**No change to the Plan**



*Representation(s)*

**3621 Mr & Mrs V & J Griffiths [555]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

The site full planning permission to construct 20 dwellinghouses. It was granted permission in December 2008, under Application S/19881. A technical start has been acknowledged on the development, by virtue of the formation of part of the access off Heol Waunyclun in 2010. The planning is therefore "valid in perpetuity", and we submit that its continued legal status should be recognised through formal allocation as such in the draft Local Development Plan. A site layout is provided together with further supporting information. This site will not appear at odds to the prevailing spatial pattern of development in Trimsaran. The locality has numerous examples of modern cul-de-sac development being completed at backland locations, which in turn, advocates that the form of development proposed here is no different, resulting in it being respectful to the character and setting of the locality. Objection to the omission of current LDP allocation T3/4/h4 from the deposit revised LDP under policy HOM1 - site reference AS/157/014. Reference can be made to 8 objections about the deliverability of allocated sites - including 3645. Those 8 Housing allocations should be removed from the plan and units redistributed to alternative Sites such as this one as there is clear evidence that such moderately-sized sites are far more likely to be brought forward and developed in full by regional housebuilders given that construction and development costs are more likely to be viable in relation to house sales and the general housing market in this part of Carmarthenshire. Refer also to rep 3637.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site.**

**The respondent has the opportunity to develop the site in conjunction with the planning permission.**

*Action*

**No change to the Plan**



*Representation(s)*

**3637 Mr & Mrs V & J Griffiths [555]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

The site has the benefit of outline planning permission granted in January 2018, under Application S/35524. That permission remains extant, with the site layout plan reproduced as The provided site layout indicates that a total of 35 dwellinghouses could be constructed over a cul-de-sac layout, forming a second phase of development from the Heol Waunyclun phase (see representation 3621). Further supporting information is provided. This site will not appear at odds to the prevailing spatial pattern of development in Trimsaran. The locality has numerous examples of modern cul-de-sac development being completed at backland locations, which in turn, advocates that the form of development proposed here is no different, resulting in it being respectful to the character and setting of the locality. Objection to the omission of current LDP allocation T3/4/h5 from the deposit revised LDP under policy HOM1 - site reference AS/157/015. Reference can be made to 8 objections about the deliverability of allocated sites - including 3645. Those 8 Housing allocations should be removed from the plan and units redistributed to alternative Sites such as this one as there is clear evidence that such moderately-sized sites are far more likely to be brought forward and developed in full by regional housebuilders given that construction and development costs are more likely to be viable in relation to house sales and the general housing market in this part of Carmarthenshire.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**





*Representation(s)*

**3099 Mr T Pearce [2802]**

**Object**

**Agent: RPS Planning & Development (Emma Fortune) [681]**

*Summary:*

Whilst we support the inclusion of part of Candidate Site SR/126/001 within the development limits of Pendine, we consider that the site also provides an opportunity to accommodate a slightly larger form of sustainable residential development. The proposed allocation would, however, still be very modest in scale and would not extend the built development limits of Pendine along Tavernspite Road any further than the existing situation to the north.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**The land which has been allocated provides a suitable and sympathetic development within Pendine, which meets the housing need within the village. It is considered that the allocation of further land which is subject to this representation is not needed to accommodate new growth.**

*Action*

**No change to the Plan**

*Representation(s)*

**3205 Mr & Mrs Gary & Lynne Edwards [4671]**

**Object**

*Summary:*

The site reference is AS/016/020. States Plan is sound but is seeking new site. The site is promoted as a natural extension of Dolau Fan Road Housing Estate for 50 houses. The land is derelict. All services are available and adequate with existing access. A Bus service is in operation and the land is for sale. Solar, wind, water power are also highlighted. The main thrust of the representation is for housing however. This is therefore an objection to policy HOM1 in that the land is omitted as a housing allocation. Reference may be made to representation 3204. Supplemental information on access and land ownership provided in addition.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The site does not accord with Stage 2 (Phase 2b) of the Site Assessment Methodology for the following reasons - Development of the site for housing will be contrary to general planning principles (unacceptable extension) and would have a detrimental impact on the character and setting of the settlement or its features. In this regard, it is considered that allocating for housing would lead to an illogical and unnecessary eastern departure from the established urban form of the Dolau Fan area. Also, there is sufficient and more suitable land available for residential development within the settlement to accommodate its housing need. For other potential uses highlighted in the representation - these would be for consideration against the Plan's policy framework.**

**(Cross referencing note - the Council's response to representation reference number 3204 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**



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**Representation(s)****4191 Tata Steel Europe Limited ( \_ \_ \_ ) [5156]****Object****Agent: Turley Associates Ltd (Abi Roberts) [4717]****Summary:**

Our client strongly objects to the failure to also allocate land this site for residential development - site reference AS/086/086. This site originally formed part of an outline planning application covering the adopted LDP allocated site ga2/h35 as a whole but was removed from the application boundary in response to comments raised by NRW in relation to flood risk. In the interests of delivering new homes in the shortest space of time, our client took the decision to amend the application. It is prudent for our client to await the release of the new flood maps and publication of the revised TAN15 to ensure that the technical work supporting a resubmitted outline planning application is not superseded by the updated policy position. The detailed surveys and reports prepared to support the previous outline planning application demonstrate that the site is suitable for residential development. Any future planning application would be supported by appropriate technical work to demonstrate that a scheme could be brought forward that addresses flood risk (specifically in relation to climate change). The land controlled by Tata Steel at Erw Las would provide a viable and deliverable allocation that could be brought forward quickly. An enclosed Property Consultancy letter dated 27 March 2020) confirms that the two parties interested in the site at Maesyrdafen Road (see rep 4187 - allocation prc2/h15) have also registered their interest in the site at Erw Las. Both parties have indicated that they consider the site to be deliverable, subject to appropriate reprofiling. The developers have indicated that they are keen to get confirmation of the impending changes to the NRW flood mapping and TAN 15, which would enable them to progress with the necessary technical work. This is in the acknowledgement that there are deliverable solutions to flood risk. The technical documents prepared to support the original planning application further establish the suitability of the site to provide residential development. During the course of the application, no in principle technical objections were received from statutory consultees (but referenced flood risk as discussed above). The site is sustainably located and has a functional relationship with the allocated site adjacent (pr2/h15). Corrected plan submitted.

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*Council's Initial Response*

Reference is made to the assessment conducted within the site assessment table of current LDP allocation (site ref Ga2/h35). However it is considered that given that this representation is expressly promoting that part of GA2/h35 that has not been allocated in the Deposit Plan it does require its own further assessment. It should be noted that part of the former Ga2/h35 allocated area has been allocated - refer to the Council's response to representation 4187 (allocated site prc2/h15, under responses received to comments on policy HOM1 - Housing Allocations).

This assessment of the site site (i.e. AS/086/086) has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. It does not accord with Stage 2 (Phase 2b) of the Site Assessment Methodology for the following reasons: there is insufficient evidence to confirm that the site is deliverable. In noting the detailed information submitted with the representation, there remain fundamental deliverability concerns - reference is made to the Plan's evidence base in terms of flooding - notably the Stage 1 SFCA, as well as the planning history on this site. Also, there is sufficient and more suitable land available for residential development within the settlement to accommodate its housing need, including that land allocated adjacent (allocation PrC2/h15).

*Action*

**No change to the Plan.**

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*Representation(s)*

**4543 Mr G Jones [5287]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

The inclusion of this site within reinstated development limits for Cynheidre would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community. The site is subject of a permission for the siting of a number of caravans and therefore qualifies as previously developed land. In addition, residential development at this location:- \* would not be detrimental to the amenity of adjacent properties; \* would satisfy recognised housing and sustainability objectives; \* would not have a detrimental impact on the landscape or nature conservation interests. Furthermore, the site is not impeded by any access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints and its delivery, if allocated, is assured. A layout of 5 units is provided. This is an objection to the non allocation the site under HOM1 site ref is AS/046/001 Reference is made to representation 4544 under policy sp16.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**It should be noted that the site is within a tier 4 settlement and therefore no HOM1 housing allocations will be made.**

**Reference should be made to the Council's response to representation reference number 4544 under policy sp16.**

*Action*

**No change to the Plan.**



*Representation(s)*

4243 - RSAI - [4993]

Object

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

*Summary:*

This is a suitable and deliverable site with limited technical or environmental constraints. As explained in our candidate site submission (documents attached again for the Inspector's benefit) we consider that our client's site is suitable for development. It is immediately adjacent to the settlement boundary and within close proximity to the primary school and other facilities such as play areas, playing fields and bus stops. There are very limited physical and environmental constraints and there is no flooding issue - the Council's SFCA confirms that the site is in the best category in terms of flooding. We consider that suitable sites that are of the very lowest flood risk should be allocated ahead of others that have a higher flood risk. This site should be looked at positively in this regard. Including our client's site would assist in ensuring that Llangennech remains a vibrant and viable settlement. Additional housing in this area in the short term will assist in supporting the primary school. There is a risk that in delaying the vast majority of development until 2025-2030 that the settlement and its services and facilities will become stagnant. A critical mass is required in the short term to ensure the vibrancy of the town's facilities and services.

A recent statement from a renowned volume house builder confirming their continued interest in the site (and that they consider the site to be deliverable in the short term) accompanies this representation. We have provided regular updates to the Council regarding the firm developer interest in developing the site in the short term and an update in the form of a statement from the said developer and we are concerned in this regard that a number of sites have been allocated without a developer that is lined up to build out the site, especially those that are to contribute to the development trajectory in the first 5 years (specific site objections have been made to a number of sites in the Plan which have a housing component (along with 1 reserve site) and should be referred to). We have demonstrated that the site is viable given the developer interest, meaning that there is certainty that the site can be delivered. We query whether the proposed allocations benefit from the same certainty in terms of delivery. This is an Objection to non inclusion of candidate site SR/086/075 under HOM1 - site reference AS/086/075 given that the candidate site is not allocated for housing.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**In regards the query on 'whether the proposed allocations benefit from the same certainty in terms of delivery' (as the site being promoted here), the Council would refer to the response provided to representation reference number 4231 under policy SP3.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3326 David Hefin Lewis [2772]**

**Object**

*Summary:*

Objection to the exclusion of the candidate site SR/005/001 (CA0087) comprising 2 fields - Western field for a sewage works and the Eastern site for housing. My land does not flood. According to Welsh Government it is too small to farm. Both LDP Inspectors advised it was suitable for affordable housing.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3739 Mr C Howells [5048]**

**Object**

**Agent: Nicole Jones (Nicole Jones) [704]**

*Summary:*

Objection to the exclusion of candidate site SR/049/008 under Policy HOM1. The site is located immediately adjacent to the development limits for Drefach and abuts designated LDP housing site GA3/h51. There is a current planning application for residential development on GA3/h51 awaiting determination.

The field has got an existing vehicular access off Heol Blaenhirwaun at the northern side of the land. No evidence can be found on the flood maps that the site floods. Mains services are in close proximity to the site. The site lies close to the services and amenities afforded by Drefach and the transport links to Carmarthen, Llanelli and further East are well established.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan**

*Representation(s)*

**3958 Mr Philip George Bsc (Hons) Qs. Dip Con. [521]**

**Object**

*Summary:*

Objection to the exclusion of candidate SR/074/004, which is currently housing allocation T3/3/h3 in the adopted LDP.

The site forms an integral part of Kidwelly and should remain in the LDP. We intend to formalise the planning permission and commence development in the near future.

**3959 Mr Philip George Bsc (Hons) Qs. Dip Con. [521]**

**Object**

*Summary:*

Object to the exclusion of part of the current allocation T3/3/h3 within the adopted LDP under reference AS/074/012.

The site forms an integral part of Kidwelly and it would be a shame to removed it from the LDP in its entirety and therefore half the site (5 acres ) should remain in the LDP! We intend to formalise the planning permission and commence development in the near future and phase one would fit in with this objective!

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan**



**Representation(s)****4516 Lucy Tootle [5279]****Object****Summary:**

I am writing to inform you that we as a family living in the local area support the proposal to remove the scrapyard and replace it with a new housing development and a safeguarded ecology area.

**4512 Mr Gareth Edwards [5276]****Object****Summary:**

We confirm our support to remove the scrapyard and replace it with an attractive, new housing development and a safeguarded ecology area.

**3984 Mr Phil Mann [2574]****Object****Agent: Mr Stuart Owen [731]****Summary:**

Objection to HOM1 seeking inclusion of part of site SR/067/004, and that in not allocating this site for residential development and ensuring removal of an inappropriate use which is detrimental to the amenity and safety of the residents of Gorslas is unsound.

**4507 H Barrell [5269]****Object****Summary:**

Objection to the exclusion of site reference SR/067/004

**4506 Bryan & Lynette Winn [5268]****Object****Summary:**

Agreement with the removal of the scrapyard in the village of Gorslas and be replaced with housing and a safeguarded ecology area. Site AS/067/004

**3781 Cllr. A & D Vaughan Owen & Price [5057]****Object****Summary:**

Objection to the exclusion of candidate site ref SR/067/004 under policy HOM1.

We have received representations from residents in Gorslas who would like to see the former scrap yard on Cefneithin Road included in the Deposit LDP for the purposes of housing. We are aware that discussions have taken place between a proposed developer and local authority officers in terms of the site.

We would support moves to develop part of this site, and would urge officers to do all that they can to reassess whether a scheme could be developed which is both financially viable for the developer and protects the ecology of the area.

**4505 Denise Dixon [5267]****Object****Summary:**

I am a resident of Cross Hands and I would like to support Manor Homes proposal to remove the scrap yard at Cefneithin Road, Gorslas and build new homes there.

**4510 P N Newell [5272]****Object****Summary:**

I wish to support the proposal to remove the scrapyard and replace it with a new housing development and safeguarded ecology area in Gorslas ref SR/067/004.

*Council's Initial Response*

The site does not accord with Stage 2 (Phase 2b) of the Site Assessment Methodology for the following reasons. The site comprises a longstanding allocation, part of which has been developed. The remaining part of the allocation will be deallocated as it comprises an area of ecological value and there are concerns regarding the delivery of the site. There is sufficient and more suitable land available for residential development within the town/village to accommodate its housing needs.

*Action*

No change to the plan

*Representation(s)*

3438 Mr D Williams [3994] Object

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the omission of candidate site SR/115/003. The inclusion of this site within the development limits for Mynyddcerrig would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table.

Mynyddcerrig has been defined as a Tier 4 settlement, and therefore the village does not have development limits. Any proposal will be considered against the policies set out within Policy HOM3 of the revised LDP.

*Action*

No change to the Plan

*Representation(s)*

**3661 Mr & Mrs Evans [3692]**

**Object**

**Agent: Aled Thomas Planning Design Ltd (Mr Aled Thomas) [3225]**

*Summary:*

Seeks the inclusion of SR/083/002. This site is believed to be a perfect site for inclusion within the Local Development Plan to allow for further residential properties within the locality for local people.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**The site would be an illogical extension to the settlement by impacting on the rural nature of Llandyfaelog and the character of the area.**

*Action*

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*Representation(s)*

**3241 Richard Williams [2671]**

**Object**

*Summary:*

The site reference is AS/049/013 (previously promoted as candidate site SR/049/013). The site adjacent has had its LDP status withdrawn after some 15 years because it failed to deliver any houses. This happened because the site had no access to a main sewer. This site has a gravity fed main sewer on site and can deliver homes with proper sized front and back gardens that people will want to purchase. This is therefore an objection to policy HOM1 in that the land is omitted as a housing allocation.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers.**

*Action*

**No change to Plan**

=====

*Representation(s)*

**3278 Miss Joy Richards [605]**

**Object**

*Summary:*

Seeks the inclusion of site SR/004/004 - Land at Penybank Road

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to Plan**

*Representation(s)*

**3424 Ms K Mottram [4978]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the omission of SR/158/003. The inclusion of this site within the development limits for Tumble would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the Plan**

*Representation(s)*

**3431 Ms K Mottram [4978]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the omission of SR/158/004. The inclusion of this site within the development limits for Tumble would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to Plan**

*Representation(s)*

**4400 Mr Ken Davies [5164]**

**Object**

*Summary:*

Objection to the non-inclusion of site SR/075/002 from the Deposit LDP under Policy HOM1 Development Limits.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4464 Mrs Bethan Thomas [2311]**

**Object**

*Summary:*

Seek the inclusion of land within the revised LDP, and provides information relating to the planning history of the allocated site which is adjacent this candidate site.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3436 Mr & Mrs H Davies [3990]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of a site.  
The inclusion of this site within the development limits for Foelgastell would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the Plan**

*Representation(s)*

**3440 Mr A Thomas [4025]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the omission of candidate site SR/018/003.

The inclusion of this site within the development limits for Capel Hendre would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the Plan**

*Representation(s)*

**3448 Mr A Rees [3910]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of site SR/004/025.

The inclusion of this site within the development limits for Betws would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to Plan**

*Representation(s)*

**3450 Messrs D & T H Jones [4100]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of site SR/040/004.

The inclusion of this site within the development limits for Cwmgwili would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the Plan**

*Representation(s)*

**3397 mrs julie james [4929]**

**Object**

*Summary:*

Objection to the exclusion of site SR/021/005 Capel Dewi Road, Llangunnor Carmarthen:

This site is wholly acceptable for development from a site selection perspective.

This site is level and south facing with immediate access to multiple road links .

Bus links , wide pavements and cycle paths are directly opposite and it is within easy walking distance to employment / Carmarthen Town. There is good road lighting, and services in place.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



**Representation(s)****3454 Mr E Salini [4088]****Object****Agent: JCR Planning Ltd (Mr Craig Jones) [4665]****Summary:**

Objection to the omission of site SR/004/036 - Land at Wern Ddu Road, Ammanford. The inclusion of this site within the development limits for Ammanford would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

**3460 Mr G Thomas [4987]****Object****Agent: JCR Planning Ltd (Mr Craig Jones) [4665]****Summary:**

Objection to the exclusion of site SR/040/005.

The inclusion of this site within the development limits for Cwmgwili would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

**3452 Mr A Williams [3980]****Object****Agent: JCR Planning Ltd (Mr Craig Jones) [4665]****Summary:**

Objection to the exclusion of site SR/040/003.

The inclusion of this site within the development limits for Cwmgwili would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

**3458 Mr & Ms W & R Lawrence [4986]****Object****Agent: JCR Planning Ltd (Mr Craig Jones) [4665]****Summary:**

Objection to the exclusion of site SR/004/041.

The inclusion of this site within the development limits for Ammanford would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers

*Action*

No change to Plan



*Representation(s)*

3455 Mr E Davies [4097] Object

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of site SR/067/013.

The inclusion of this site within the development limits for Cross Hands would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers

*Action*

No change to Plan



*Representation(s)*

**3464 Messrs T & B Evans & Owen [4984] Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of site SR/082/010.

The inclusion of this site within the development limits for Llandybie would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the Plan**

*Representation(s)*

**3427 Mrs E Humphries [4981] Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the non-inclusion of site SR/067/014 within the development limits for Gorslas. Allocation of this site would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community. Its inclusion will reflect a previous planning permission which confirmed its acceptability for residential development.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the Plan**

*Representation(s)*

**3517 Mr Clive Douch [2924]**

**Object**

**Agent: Nicole Jones (Nicole Jones) [704]**

*Summary:*

Objection to Policy HOM1. Seek inclusion of site SR/138/005 in Pontyberem.

There is an existing access points onto Llannon Road which is wide enough for a new development site, with good visibility standard in both directions.

No evidence can be found that the site floods.

All services: mains water supply, foul sewer, electricity and high-speed electronic communications networks, are in the next field along.

Pontyberem is a small town which has got all necessary amenities in close proximity, and the transport links to the towns of Carmarthen and Llanelli are well established and developed.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the Plan**



*Representation(s)*

**3542 Mr Clive Douch [2924]**

**Object**

**Agent: Nicole Jones (Nicole Jones) [704]**

*Summary:*

Objection to the exclusion of site SR/138/006 from the development limits of Pontyberem:

Access can be achieved either though the adjoining field which was already include in the LDP or through another adjoining field which the owner has put forward as a candidate site.

Flooding: The site lies well above the water level and in good distance from any water course. No activities have taken place which would have resulted in a contamination of the soil or the sub soil.

All services: mains water supply, foul sewer, electricity and high-speed electronic communications networks, are in the next field along.

Pontyberem is a small town which got all necessary amenities in close proximity.

The transport links to Carmarthen and Llanelli town are well established and developed.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the Plan**



*Representation(s)*

**3549 Gwenego Homes Ltd [5003]**

**Object**

**Agent: Atriarc Planning and Construction (Mr Wayne Reynolds) [745]**

*Summary:*

Objection to the exclusion of site SR/082/003 from the Deposit LDP:

When comparing this site to those allocated within the Llandybie settlement, considering services are already in-situ, the allocation of this site is considered preferable in comparison to those sites where greater infrastructure works would be required to facilitate development. The nature of this site would also allow options for self-build plots, which are considered to be underrepresented in the deposit LDP. The inclusion of this site would have a minimal impact on the overall number of dwellings proposed in the deposit LDP, however due to its peculiarities, we consider it's inclusion is well supported from a LDP Planning assessment and policy perspective.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the Plan**



*Representation(s)*

**3601 Mr A Pritchard [5153]**

**Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Objection to the exclusion of candidate site SR/082/005 under policy HOM1:

Although currently undeveloped, the Candidate Site represents a sustainable and deliverable opportunity to provide new housing within the settlement of Llandybie. With the land already capable of being easily served by all services and an adopted means of access by virtue of the adjoining public highway, together with the Site's greenfield and agricultural form, there are no barriers to the its delivery within the early stages of the forthcoming Plan.

In addition, the Site lies within close proximity and walking distance of the existing community services and local facilities of the adjoining settlement, which will ensure it makes a positive contribution to both national and local sustainable development objectives.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the Plan**

*Representation(s)*

**3402 Aled & Sarah Jones & Holmes [3654]**

**Object**

*Summary:*

Objection to the exclusion of site SR/021/21  
Providing more smaller sites directly in the heart of the Town would provide a more varied choice for people, in-keeping with the unique market town / community feel of Carmarthen, for those who want to remain or move into the area, rather than limiting people's options with just a 'shoebox' house, engulfed within a large housing estate built by Large National House Builders.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non-inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3617 Mr & Mrs D Rourke [3925]**

**Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Objection to the exclusion of candidate site SR/132/008.

The Site forms a logical extension to the existing settlement, being well related to it and being positioned at a location within the wider landscape to not form a prominent or logical part of the surrounding open countryside. The Site also represents a logical subsequent phase of the adjoining recently constructed residential development, which in itself sustains the argument of the Site's deliverability and viability.

In addition, the Site lies within close proximity and walking distance of the existing community services and local facilities of the adjoining settlement.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the Plan**

*Representation(s)*

**3622 Union Tavern Estate [3913]**

**Object**

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

*Summary:*

Candidate Site SR/067/008 should form a housing allocation. The site is not within or near any statutory cultural heritage, landscape or ecological designations. There are no technical constraints on the site that cannot be overcome or would preclude residential development. The site is sustainably located, there are no pre-requisite infrastructural requirements to enable it to be developed. It is deliverable and in an area where there is demand for residential development. The enclosed Transport Statement demonstrates that site is accessible to pedestrians, cyclists and public transport users; a safe and appropriate access, that meets current design standards, can be provided.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the Plan**



*Representation(s)*

**3649 Landview Developments Ltd [5020]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

We seek the allocation the land for a mix of residential development, areas of formal and informal amenity space, habitat enhancement areas, as well as improvements to local pedestrian and cycle link provision and linkages. The site comprises a series of existing enclosures, with vehicular access gained off the access estate road shared with a recently constructed residential development to its north east, although multiple pedestrian and cycle linkages would also be available along all boundaries of the site. Locationally, the site is also within close proximity to the range of community facilities and local services the settlement and surrounding area has to offer. A detailed report is provided as to why the site (SR/159/007) should be considered for a mixed use site under policy HOM1.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the Plan**

*Representation(s)*

**3659 Mr Clive Douch [2924]**

**Object**

**Agent: Nicole Jones (Nicole Jones) [704]**

*Summary:*

Seeks the inclusion of candidate site SR/138/009 with the representation identifying a number of positive reasons for its inclusion.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the Plan**

*Representation(s)*

**3285 Mr C B Jones [710]**

**Object**

*Summary:*

The Council's concerns in the candidate site assessment are acknowledged with an option for access put forward from the south eastern corner and locked gate. Meeting held with the County Council's corporate property with regards a south west access and I feel that issues with parked cars, width of road and public footpath can be overcome. I am aware of the costs included by using Council roads and land as an access route to this site. 3 options available - south west corner access for social housing or 4 private houses and south east corner - 2 private houses. This site is of no use agriculturally - (reference can be made to representation 3767 where the respondent objects to allocation prc2/h1 - notably describing that site as beautiful grazing land). Therefore, Policy HOM1 is objected to due to the fact that candidate site SR/086/001 is not allocated for housing in the deposit Plan. Site reference AS/086/001.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**(Cross referencing note - the Council's response to representation reference number 3767 can be viewed under the Council's HOM1 policy responses - housing allocations - site prc2/h1)**

*Action*

**No change to the Plan.**



*Representation(s)*

**3426 Mr & Mrs I & S Howell & James [4980] Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to Policy HOM1 in that site SR/016/006 has not been allocated: The inclusion of this site within the development limits for Pembrey would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community. Objection site reference AS/016/006.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3443 Mr R Nicholls [4057] Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

The inclusion of this site within the development limits for Five Roads would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community. Objection to non inclusion of candidate site SR/061/008, objection site reference is AS/061/008.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

**Representation(s)****4272 Persimmon Homes West Wales (Stuart Phillips) [5154]****Object****Agent:****WYG PLANNING & ENVIRONMENT (Louise Darch) [598]****Summary:**

It is considered that the land at Fforest Road should be allocated for new homes as proposed as it is free from environmental constraints and is evidently deliverable the short term. The respondent notes that the Council deems that there is sufficient residential land allocated in the settlement (site assessment by the Council). Planning Policy Wales edition 10 makes clear that sites should be free or readily freed from planning, physical and ownership constraints and be economically viable. The land at Fforest Road site compasses all necessary elements, meets the Sustainability Assessment criteria and is clearly deliverable / viable as demonstrated by the precedent set at SeC6/h4. In regard to site deliverability / viability, a note has been prepared and submitted. A Masterplan is provided. Reference may be made to representation 4276 (comment on policy sp3), whilst a series of objections have been made to a number of allocations in the County - notably within the Hendy / Fforest settlement are sites SeC6/h2 and SeC6/h5.

This is an objection to the non allocation of option 1 (area beyond allocation SeC6/h4) under policy HOM1.

The site reference is AS/069/016 (amended from SR/069/003 as part of that candidate site submission area was in fact allocated under SeC6/h4).

**4275 Persimmon Homes West Wales (Stuart Phillips) [5154]****Object****Agent:****WYG PLANNING & ENVIRONMENT (Louise Darch) [598]****Summary:**

It is considered that the land at Fforest Road should be allocated for new homes as proposed as it is free from environmental constraints and is evidently deliverable the short term. The respondent notes that the Council deems that there is sufficient residential land allocated in the settlement (site assessment by the Council). Planning Policy Wales edition 10 makes clear that sites should be free or readily freed from planning, physical and ownership constraints and be economically viable. The land at Fforest Road site compasses all necessary elements, meets the Sustainability Assessment criteria and is clearly deliverable / viable as demonstrated by the precedent set at SeC6/h4. In regard to site deliverability / viability, a note has been prepared and submitted. A Masterplan is provided. Reference may be made to representation 4276 (comment on policy sp3), whilst a series of objections have been made to a number of allocations in the County - notably within the Hendy / Fforest settlement are sites SeC6/h2 and SeC6/h5.

This is an objection to the non allocation of option 2 (area beyond allocation SeC6/h4) under policy HOM1.

The site reference is AS/069/017 (amended from SR/069/015 as part of that candidate site submission was in fact allocated under SeC6/h4 - note site area SR/069/015 was never plotted as a candidate site but was included on the register - clerical error).

*Council's Initial Response*

Reference is made to the site assessment table where relevant previous assessments were undertaken at candidate site stage - notably references SR/069/001, SR/069/003, SR/069/005 & SR/069/015.

This further / new assessment of the site is as a result of a representation made to the deposit version of the Revised LDP and in the interests of clarity given this objection site area excludes that area allocated for housing under reference SeC6/h4.

This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The site has proceeded through the site assessment methodology stages, however it will not be allocated as there is sufficient land available for residential development within the settlement to accommodate its housing need.

Also, in noting the outcomes of this and previous site assessments, a wider review of the settlement (with reference to the Role and Function Paper - January 2020) would indicate that the release of this site (even as a reasonable alternative) will be resisted by the Council due to the level of growth proposed in Pontarddulais, along with the notable level of growth already seen within Hendy in recent years (part immediately preceding and part within the revised LDP plan period). Therefore, the release of a site of this scale cannot be supported.

Cross referencing note - the Council's response to representations made by the respondent seeking deletion of allocated housing sites from the Plan - including SeC6/h2 (representation number 4312) can be viewed under the Council's HOM1 policy responses - housing allocations.

Also, the Council's response to the Council's response to representation number 4276 can be found under the Council's response to representations made under policy SP3.

*Action*

No change to the Plan.



*Representation(s)*

**3373 Mr J Davis [672]**

**Object**

*Summary:*

Please see attached document.

LPA summary: Site AS/148/001 should be included as it has greater sustainability values compared to site SuV33/h1. The site is directly adjacent to the development limits and is within an existing urbanised environment. The layout has individual access points and would be deliverable and would be immediately available for development.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3432 Mr & Mrs Harrison [3978]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of SR/098/002.

The inclusion of this site within the development limits for Llanllwch would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**Agree to the inclusion of a smaller part of site AS/098/002 as requested by representation 3276, it is considered acceptable to include the site within the development limits to allow the flexibility for potential future development within a settlement with otherwise very limited growth. Any potential proposal will be considered against the policies set out within the revised LDP.**

**In terms of the wider site being included as a housing allocation, the reasons for its non-inclusion are set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**Amend development limits in Llanllwch to include site AS/098/004.**

*Representation(s)*

**3441 Mr R Chadzy [3905]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to exclusion of site SR/121/005.

The inclusion of this site within the development limits for Newcastle Emlyn would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3518 Amanda Arter [834]**

**Object**

**Agent: Geraint John Planning Ltd (Mr Luke Grattarola) [685]**

*Summary:*

Objection to Policy HOM1. Seeking an extension to a housing allocation in Llanybydder.

The site within our client's ownership has been allocated under site reference Sec13/h1 for residential development. We fully support this policy and allocation while also encouraging an extension of the land included. A detailed case is provided in the attachment.

*Council's Initial Response*

**Disagree to the extension of the housing allocation on the site. The site lies within the development limits and if there is potential for the incorporation of the house and outbuildings in a scheme for the adjoining site, this will be considered as under the policies of the Plan.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3606 Mr N Davies [4032]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

We seek the inclusion of the unallocated part of candidate site referenced SR/021/042 under Policy HOM1 in addition to that part which has been allocated in the Deposit LDP.

The Candidate Site forms a logical extension to the existing settlement, being well related to established residential development off the very long western perimeter which forms a continuous developed boundary with intervening mature trees able to be fully retained.

In addition, the site lies within immediate proximity and walking distance of Glangwili Hospital. The local Primary School, filling station and store and nearby public house are located only a short distance to the site, with Carmarthen Town Centre a short drive of only 5 minutes.

*Council's Initial Response*

**Part of the site has been included within the Plan as a housing allocation. In terms of the remainder of the land it is has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the additional land. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**





*Representation(s)*

**3409 Avison Young (Michael Southall) [755] Object**

***Agent: Avison Young (Michael Southall) [755]***

***Summary:***

Objection to the non-inclusion of site SR/075/002.

Accordingly, this representation is made with respect to the land adjacent to Pludds Meadow in Laugharne for residential purposes. The extent of which is shown on the site location plan (enclosed at Appendix I). This same site was promoted for residential purposes as part of the call of candidate sites consultation exercise that was carried out by the council in June 2018.

Access is gained via a field gate with the adjacent Pludds Meadow development site, into which an access has been created onto the A4066 (this land falls within the ownership of our client).

***Council's Initial Response***

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

***Action***

**No change to the Plan.**

*Representation(s)*

**3676 Mr Paul Evans [3701] Object**

***Agent: Hayston Development & Planning Ltd (Mr Andrew Vaughan Harries) [5042]***

***Summary:***

Objection to the non inclusion of the new candidate site AS/163/012, and provides a supporting statement for its inclusion.

***Council's Initial Response***

**There is sufficient and more appropriate land available for residential development within the town to accommodate its housing needs. A part of the site will continue to be within the development limits to match the existing urban form at Spring Gardens.**

***Action***

**No change to the Plan.**

*Representation(s)*

**3341 LR HM & IR Lewis [4945]**

**Object**

**Agent: Asbri Planning Ltd (Mr Keith Warren) [592]**

*Summary:*

Land at Dolau Fields/N of Dan y Crug, Llandovery Sec15/h1:  
This Housing Allocations is objected to on the basis that the numbers associated with SeC15/h1 be extended to 61 dwellings to reflect the extant planning permission.

The Proposals Map is also objected to on these grounds.

*Council's Initial Response*

**There are concerns over the deliverability of the site in its entirety, as allocated in the current LDP. The site has been allocated for housing for a number of years and has not been developed. For this reason it was deemed necessary to reduce the size of the allocation to frontage only (in keeping with the adjacent built form) with reference SeC15/h1, and to exclude the remainder from development limits.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3260 Matthew Utting [2833]**

**Object**

*Summary:*

Furthermore, enlarging allocation ref. PrC3/h4 to yield circa 80 additional dwellings over and above the 'committed' 289 dwellings that are already consented on the site would avoid the need to make an equivalent allocation elsewhere in the County. As such, my client requests that housing allocation ref. PrC3/h4 in Policy HOM1 of the Deposit Revised LDP is confirmed for circa 330 dwellings, using the boundaries of Candidate Site ref. CA0326 (Site Ref. SR/004/012) contained within your Authority's Candidate Sites Register of December 2018. We therefore seek the inclusion of the entire candidate site SR/004/012.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**There is sufficient and more suitable land available for residential development within the town, to meet it's housing need.**

*Action*

**No change to the Plan**

*Representation(s)*

**3610 Dr J Thomas [5015]**

**Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Objection to the exclusion of candidate site ref SR/148/002 under Policy HOM 1:

The Site forms a logical extension to the existing settlement, as well an opportunity to facilitate the delivery of adjoining land previously considered appropriate for development by the Authority. The Site's close association to existing and proposed development to its west and north respectively also result in the ability of the Site being developed without detriment to visual amenity, in either the immediate or wider context.

The Site lies within close proximity and walking distance of the existing community services and local facilities of the adjoining settlement, which will ensure it makes a positive contribution to both national and local sustainable development objectives.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3662 C & J & J Wilson, Griffith & Jenkins [5028]**

**Object**

**Agent: Aled Thomas Planning Design Ltd (Mr Aled Thomas) [3225]**

*Summary:*

Seek the inclusion of site SR/021/018 within the HOM1 allocations. The site is believed to be a perfect site for inclusion within the Local Development Plan to allow for further residential properties within the locality for local people. In a climate where there are not enough housing available, it is considered that the authority should re-asses their assessment of this site and consider it's inclusion due to the land owners being keen in developing the land.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3663 Mr Islwyn Evans [5029]**

**Object**

**Agent: Aled Thomas Planning Design Ltd (Mr Aled Thomas) [3225]**

*Summary:*

Seek the inclusion of site SR/021/006 within the HOM1 allocations. This site is believed to be a perfect site for inclusion within the Local Development Plan to allow for further residential properties within the locality for local people.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3665 Arwel & Martin Davies & Jones [5031]**

**Object**

**Agent: Aled Thomas Planning Design Ltd (Mr Aled Thomas) [3225]**

*Summary:*

Seek inclusion of new candidate site AS/021/054. This site is believed to be a perfect site for inclusion within the Local Development Plan to allow for further residential properties within the locality for local people. In a climate where there are not enough housing available, it is considered that the authority should re-asses their assessment of this site and consider it's inclusion due to the land owners being keen in developing the land.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. It is considered that there is sufficient and more suitable land available for residential development within the town/village to accommodate its housing needs.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3713 Harold Metcalfe Partnership (Mr D A Jones) [706]**

**Object**

*Summary:*

We request the inclusion of this parcel of land as an extension to housing allocation SUV32/h1 for the following reasons:

- It lies between developed land and land which is allocated for housing, access could be gained through the currently allocated land.
- If only part of the site is included, then suitable access could be gained from the main road.
- The land compares favourably in ecological terms.
- Sewer connection, water and electricity supplies are available.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence.**

**Disagree to include the site as a housing allocation as it is considered that the site would create a backland/tandem style of development. Furthermore, it is considered that there is sufficient and more suitable land available for residential development within the town/village to accommodate its housing needs.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3401 Mrs Paula Lewis [4813]**

**Object**

*Summary:*

Objection to the exclusion LDP site T3/5/H2:

We believe the proposed plan is incorrect and incomplete. In the 2006 - 2021 LDP a portion of the land, situated alongside Parc Mansant, Pontyates (T3/5/H2) was allocated for residential development. This is missing from the proposed plans and should be reinstated. When Parc Mansant was built in the early 1990's planning permission took into consideration future development - therefore access, drainage and utilities were laid along the road at the entrance to the field in preparation for this.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3674 Richard James [848]**

**Object**

*Summary:*

Seeks the inclusion of candidate site SR/019/003. The site has not been included as there is sufficient & more suitable sites available but SR/019/007 is further away from the village. Planning has been awarded on sites for 20 years with no development. These sites are blocking new developments.

*Council's Initial Response*

**The land has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the additional land. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan**

*Representation(s)*

**3675 Richard James [848]**

**Object**

*Summary:*

Seeks the inclusion of candidate site SR/019/004. The site has not been included as there is sufficient & more suitable sites available but SR/019/007 is further away from the village. Planning has been awarded on sites for 20 years with no development. These sites are blocking new developments.

*Council's Initial Response*

**The land has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the additional land. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4478 Mr Alun Cole [5182]**

**Object**

*Summary:*

Unquestionably a genuine need for additional affordable housing in Llansteffan and Llanybri. The Candidate site is very close indeed to the current Development Limits, and there is housing to either side of the proposed Candidate site, as well as immediately above (i.e. to the north of ) it. Indeed, a large house along Old School Road and to the West of the site is still in the process of being developed.

The Candidate Site Application ought not to have fallen at the 'first hurdle' but warranted substantive and detailed consideration , which it appears it did not receive. Had the Application received such consideration, it would have become apparent from the full and comprehensive Statement which accompanied the Application shows that the site is not only consistent with but is aligned with and would positively promote all of the relevant Planning.

The Statement and the several plans which accompanied it made it clear that the proposed development at the site comprises approximately 1 acre of a 12 acre field. It was proposed that on the 1 acre, 4 affordable and 1 private dwelling be developed. The Statement details that the remaining 11 acres would be gifted in Trust to the communities of Llansteffan and Llanybri as an environmental, education and recreational amenity, together with an annual stipend for a number of years

In addition, there are procedural inadequacies relating to the publication of the maps and candidate site submission.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**In consideration of the area of land potentially being gifted to the community, the types of proposals considered within the representation can be determined under current LDP policies.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3284 Mrs Barbara Jones [3134]**

**Object**

*Summary:*

This is an objection to candidate site SR/091/002. Concerns are raised in terms of access. Half of the site is in the current LDP and subject to planning application W/38125 which seeks to use Dol-y-Dderwen as an access. The majority of Llangain residents along with myself oppose the current plans for using Dol-y-Dderwen as the access. Therefore, Policy HOM1 is objected to due to the fact that candidate site SR/091/002 forms part of housing allocation suv8/h1 in the deposit Plan.

*Council's Initial Response*

**A part of the candidate site is currently under consideration at planning appeal and is identified in the revised LDP as SuV8/h1. The remainder of the candidate site is not allocated in the plan.**

**Further evidence will be provided at examination into the deliverability of the site within the revised LDP.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3837 Mr C Stack [3950]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Our clients consider the LDP to be unsound as it "will no deliver" and seek the inclusion of site SR/021/030 as a housing allocation under Policy HOM1. A detailed assessment of the site's potential is provided. It is also considered that the addition of this site, providing an estimated 32 units will not add to the over-supply of housing in the Carmarthen town area.

*Council's Initial Response*

**The land has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the land. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3897 Mr C Jenkins [3627]**

**Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

We seek the inclusion of this site (SR/088/003) within the development limits for Llanfihangel-ar-Arth. A detailed assessment is supplied to support the request for inclusion justifying the site's potential for development. The continued inclusion of the allocated housing site is questioned, as is the inclusion of white land suitable for small scale development, a comparison is provided to our clients land in this respect.

**3667 Mrs Samantha Brunell [5034]**

**Object**

**Agent: Aled Thomas Planning Design Ltd (Mr Aled Thomas) [3225]**

*Summary:*

Seek the inclusion of SR/147/001 under policy HOM1. This site is believed to be a perfect site for inclusion within the Local Development Plan to allow for further residential properties within the locality for local people. In a climate where there are not enough housing available, it is considered that the authority should re-assess their assessment of this site and consider it's inclusion due to the land owners being keen in developing the land.

*Council's Initial Response*

**The land has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the land. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3900 \_ \_ Jones, Douch, T.A.C Morgan, Bromley Davenport, Boggis-Rolfe [5085]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

We seek the inclusion of site SR/021/038 as a housing allocation within the Carmarthenshire LDP. The site is suitable for 250 dwellings and will not appear at odds to the prevailing spatial pattern of development in Llangunnor. The locality has numerous examples of modern cul-de-sac development being completed at backland / edge of settlement locations, which in turn, advocates that the form of development proposed at Llangunnor is no different, resulting in it being respectful to the character and setting of the locality. Comprehensive evidence is provided in support of the representation.

*Council's Initial Response*

**The land has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the land. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3118 Mr David Wyn Jenkins [4844]**

**Object**

*Summary:*

SR/009/001 LDP does not meet what is required in Blaenau. There is no scope for any new builds in the area at all. The Candidate Site CA0080 SR/009/001 is said to be divorced from Blaenau, but is actually inside where the sign says welcome to Blaenau. We were hoping to build on our land so that my wife could be close to her elderly parents who live just across the road at 161 Penygroes Road with their health deteriorating as time goes on. The family has owned the land for the last twenty years and are looking for a single dwelling, with the possibility of maybe more properties being built in the future, such as Affordable housing to enhance Blaenau.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence**

*Action*

**No change to the Plan**

*Representation(s)*

**3918 Mr Vaughan Davies [2808]**

**Object**

**Agent: Geraint John Planning Ltd (Geraint John) [4730]**

*Summary:*

We seek the inclusion / allocation / retention of the site (SR/021/001) as a housing allocation in the LDP. The site is already an identified housing allocation within the extant LDP, and a live outline planning application is currently under consideration by the Local Planning Authority, with a positive decision expected in the near future and a subsequent reserved matters application due to be submitted swiftly thereafter. It is considered appropriate to maintain the allocation as it will contribute towards housing delivery through the redevelopment of an existing brownfield site, in a sustainable location. Further detailed evidence is provided to support the inclusion of the site.

*Council's Initial Response*

**The land has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the land. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3922 Mr P Morris [3844]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

The objector's land ownership amounts to one large field at Penbryn Farm, Llangynnw. Approximately half of this field has been identified as being suitable for residential development, the remaining half however has been excluded. The inclusion of part of the field is obviously supported, but an objection is hereby made to the remaining part of the field that has been excluded. The justification for including only part of the objector's land will apply to all of the field.

It's inclusion would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The land has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the land. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence. The inclusion of part of the field is welcomed (covered by representation number 3920), the additional land is not considered appropriate for the reasons covered in the Site Assessment table.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3187 Mr Emyr John [4549]**

**Object**

*Summary:*

Site edged blue - Seeks inclusion of LDP site (GA3/h2 forms part of)

*Council's Initial Response*

**Noted.**

**Whilst it is noted that the site has planning permission and is under construction it is located within the C2 flood risk zone as identified on the Development Advice Maps (DAMs). Consequently, the identification of the site would be contrary to the provisions of national policy and TAN15.**

*Action*

**The dwellings being built will be accounted for as part of the Plans windfall allowance.**

**Representation(s)**

**3429 Mr R Williams [4982]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

**Summary:**

Objection to the non-inclusion of a new site - Land opposite Derwendeg, Porthyrhyd (Lower Site B):

The inclusion of this site within the development limits for Porthyrhyd would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its' development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community

**3428 Mr R Williams [4982]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

**Summary:**

Objection to the non inclusion of a site - Land opposite Derwendeg, Porthyrhyd (Upper Site A):

The inclusion of this site within the development limits for Porthyrhyd would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. It's development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

**Council's Initial Response**

**There is sufficient and more appropriate land available for residential within the village to accommodate its housing need.**

**Action**

**No change to the Plan.**

*Representation(s)*

**3388 Kidwelly Town Council (Mr Mark Stephens) [4958]**

**Object**

*Summary:*

Objection to the exclusion of candidate site SR/116/004. This site has been the subject of candidature during previous consultations. Kidwell Town Council wishes the site to be developed as housing on a co-operative basis, and the supplementary documents are provided as evidence of deliverability.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3512 Mr J W Philips [4998]**

**Object**

**Agent: Nicole Jones (Nicole Jones) [704]**

*Summary:*

Object to Policy HOM1 and request the allocation of new candidate site AS/039/008

*Council's Initial Response*

**The inclusion of the site would result in an illogical extension to the settlement. There is sufficient and more suitable land available for development within the village to accommodate its housing needs.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3600 Mr J W Phillips [5009]**

**Object**

**Agent: Nicole Jones (Nicole Jones) [704]**

*Summary:*

Objection to the exclusion of a site from the Plan under Policy HOM1:

The site lies outside any flood risk area;  
 The site is not located close or within any nature conservation;  
 There are 2 existing access points onto the whole of the field at present and the whole of the field frontage will give good visibility standard in both directions;  
 All services: mains water supply, foul sewer, electricity and high-speed electronic communications networks, are in close proximity;  
 The site is surrounded by residential development;  
 The site is in close proximity to the amenities afforded by the nearby town of Carmarthen and the transport links to Carmarthen are well established and developed.

*Council's Initial Response*

**The inclusion of the site would result in an illogical extension to the settlement. There is sufficient and more suitable land available for development within the village to accommodate its housing needs.**

*Action*

**No change to the Plan.**

**Representation(s)****4374 Mrs Lynn C C C Bushin [4817]****Object****Summary:**

This part of the objection relates to the part of the Candidate Site (SR/124/011) that falls outside of the allocation SeC14/h4.

I wish to object to this site being included in the Deposit LDP.

This site is incorrectly named & identified - There are three areas in close proximity that are called "Glanawmor" in the village of Pencader. The proposed site currently makes up part of the holding of Glanawmor Uchaf Farm and should be identified as such.

The plan supplied by the applicants to identify this site shows two fields and does not show the full extent of the land and buildings owned by the applicants, and by its omission is erroneous and misleading. The full extent of the land in ownership of the applicant and its current use should be taken in account when making this decision to include a site in the LDP.

**4004 Mrs Lynn C C C Bushin [4817]****Object****Summary:**

I object to the above site (AS/124/010) not being included in the draft LD for the following reasons:

\* This is an infill site.

\* Part of this site did have approval for a bungalow and garage to be built on it in 1990.

\* The proposed site has access to Sewerage and Water in the main road which runs past the site and directly into the centre of the village.

\* The site is served by adjacent street lighting. The 30mph road alongside the site is wide, with excellent visibility.

\* The site is large enough to accommodate attractive development to take place without the need for ribbon development and avoid cramming - unlike SR/124/002 which is crammed in alongside the adjacent housing of Maescader along the side of the busy B4459 road,

\* Comparing this proposed site against one that has been included in the Draft LDP SR/124/002 shows how more suitable this proposed site is. Not over crammed with housing, making housing development top heavy in this area of the village which is away from key facilities in the middle of the village along a narrow busy road.

\* I challenge the agricultural classification of the land, this is incorrect, this is general agricultural land.

\* This site is within the village, between and opposite existing housing and would have no more of a detrimental impact on the character and setting of the settlement as nearby site SR/124/001 which has been included in the LDP.

\* This site could provide the needed appropriate accommodation for the growing number of older people in the community.

\* Carmarthenshire County Councils own wellbeing goals and, Well-Being of Wales National Goals and indicators would be met and supported by the inclusion of this site

4001 Mrs Lynn C C C Bushin [4817]

Object

*Summary:*

I object to the above site (SR/124/009) not being included in the draft LDP and should be included as a proposed site for the following reasons:

- \* This is an infill site.
- \* The site has access to Sewerage and Water, is served by adjacent street lighting, has three routes into the centre of the village to access key facilities, with wide pavements and public footpaths.
- \* The 30mph road alongside the site is wide, with excellent visibility.
- \* The site is large enough to accommodate attractive development to take place without the need for ribbon development and avoid cramming - unlike SR/124/002 which is crammed in alongside the adjacent housing of Maescader along the side of the busy B4459 road,
- \* Comparing this proposed site against one that has been included in the Draft LDP SR/124/002 shows how more suitable this proposed site is. Not over crammed with housing, making housing development top heavy in this area of the village which is away from key facilities in the middle of the village along a narrow busy road.
- \* I challenge the agricultural classification of the land, this is incorrect, this is general agricultural land.
- \* This site is within the village, between and opposite existing housing and would have no more of a detrimental impact on the character and setting of the settlement as nearby site SR/124/001 which has been included in the LDP.
- \* This site could provide the needed appropriate accommodation for the growing number of older people in the community.
- \* Carmarthenshire County Councils own wellbeing goals and, Well-Being of Wales National Goals and indicators would be met and supported by the inclusion of this site

*Council's Initial Response*

**The land has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the land. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence. There is sufficient and more suitable land available for residential development within the town/village to accommodate its housing needs.**

*Action*

**No change to the Plan.**





*Representation(s)*

**4023 Mr P Morris [3844]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection - non inclusion of candidate site SR/021/035- site ref AS/021/035 under policy HOM1. The inclusion of this site within the development limits for Llangynnwr would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

In addition, residential development at this location (1) would not be detrimental to the amenity of adjacent properties (2) would satisfy recognised housing and sustainability objectives (3) would not have a detrimental impact on the landscape or nature conservation interests. Furthermore, the site is not impeded by any access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints and its delivery, if allocated, is assured.

A full description of the site's development potential and merits has previously been provided in the candidate site submission, to which reference should be made.

*Council's Initial Response*

**The land has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the land. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence. There is sufficient and more suitable land available for residential development within the town/village to accommodate its housing needs.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3613 Mr & Mrs J T J Davies [4132]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Objection to Policy HOM1 and seek an extension to the allocated site SeC2/h2, and include the remainder of candidate site SR/058/003:

The Candidate Site forms a logical extension to the existing settlement, being well related to established residential development.

*Council's Initial Response*

**There is sufficient land available within the village to meet its housing needs.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3096 Mr Paul Dyer [879]**

**Object**

*Summary:*

Objection to the omission of a candidate site from the settlement of Felingwm Uchaf under Policy HOM1.

With the Country crying out for housing, we think this site is ideal. Road access is not impaired. At least half would be allocated to social housing.

I enclose proposals and copy of Land Registry Map.

*Council's Initial Response*

**Felingwm Uchaf has been classified as a settlement within Tier 4 of the settlement hierarchy and therefore any site proposal will be considered under policies set out within the revised LDP, most notably Policy HOM3.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4087 Mr & Mrs C Jones [5138]**

**Object**

**Agent: Crompton Land & Development Ltd (Mr Andrew Crompton) [3047]**

*Summary:*

Objection to the exclusion of site SR/021/004 from the Revised LDP, and the representation provides a supporting statement for its inclusion.

*Council's Initial Response*

**The land has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the land. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence. There is sufficient and more suitable land available for residential development within the town/village to accommodate its housing needs.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3764 Ffos Las Ltd [3885]**

**Object**

**Agent: White Young Green (Mr Rob Mitchell) [2371]**

*Summary:*

Objection to the exclusion of candidate site SR/023/003 under Policy HOM1.

We note from the Council's Site Assessment document the above referenced candidate site was discounted after the completion of a Stage 3 assessment; this is despite, scoring very strongly in the LPA's Sustainability Appraisal. It is curious therefore, that this site is not proposed to be allocated. On the ground, the site represents the logical infill of Carway, abutting Carway's existing settlement boundary to the north and the committed housing allocation currently being delivered to the south (SC40/h3 (SeC8/h1)). Indeed, it is our view it is more appropriate for this site to be allocated than not, as it currently physically separates the existing allocation from the remainder of Carway.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non-inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3884 Welsh Government (Mr Mark Newey) [13]**

**Object**

*Summary:*

Category B - Best and Most Versatile Agricultural Land

PPW is clear agricultural land of grades 1, 2 and 3a is the best and most versatile and should be conserved as a finite resource. In the Council's SA Scoping Report (Appendix B) it identifies a patchwork of grade 3 land but does not provide detail on the split between grade 3a and 3b nor the data source of this information. Whilst the Scoping Report identifies that the majority of land in Carmarthenshire is grade 4 some of the allocated housing sites totalling 725 units are located on BMV land including PrC1/MU1 and SeC18/h6. The Council must be able to robustly justify any loss of BMV land linked to the search sequence in PPW and findings in the SA.

*Council's Initial Response*

**Noted. Further information addressing the respondents points will be prepared to support the identification of the sites contained within the Plan.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3434 Mrs J Powell [3941]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of candidate site SR/164/002. The inclusion of this site within the development limits for Ystradowen would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3459 Mr R Winterton [4026]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of site SR/060/002. The inclusion of this site within the development limits for Ffarmers would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**It should be noted that part of the site is included within the development limits and would represent an appropriate infill opportunity.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3462 Mrs S Slaymaker [4989]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of candidate site SR/090/004.

The inclusion of this site within the development limits for Llangadog would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3544 Mrs H Wight [5000]**

**Object**

**Agent: Geraint John Planning Ltd (Mr Luke Grattarola) [685]**

*Summary:*

Objection to the exclusion of candidate site reference SR/015/004 which includes current LDP allocation T3/9/h4 under policy HOM1:

\* The site benefits from a close association and connection with the services and facilities provided within Brynamman, which are situated within convenient walking distance (which would facilitate sustainable growth of the settlement).

\* The sustainability and accessibility credentials of the site lend themselves to supporting residential development at this location - several bus stops are located immediately north of the site on Cwmgarw Road.

\* It is considered that the inclusion of this land for residential development will assist the Local Authority in meeting their housing needs provision.

\* The site is wholly deliverable and can realistically come forward within the early years of the Plan period.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3589 Harold Metcalfe Partnership (Mr D A Jones) [706]**

**Object**

*Summary:*

Objection to the exclusion of candidate site SR/015/007 under policy HOM1.

This site will allow an opportunity to provide an estate, in comparison with the ribbon development which is the general arrangement along Cwmgarw Road.

Mains water and electricity are available in the vicinity of the site.

A second access is available to the land shown in red on the attached location plan.

There is no issue with flooding.

A plot within the overall site has the benefit of planning permission.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**It should be noted that part of the site (a frontage plot) is included within the development limits and would represent an appropriate infill opportunity.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3599 Mr & Mr D & P Sims & Cromwell [5012]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of site SR/135/003 under policy HOM1:

The site lies within walking distance of the village centre, and two public houses and public bus stops. It forms a logical extension to the existing settlement, being well related to established residential development. The development of the Site will form an accessible cluster at the western side of Pontargothen, mirroring similar modern residential development off the eastern side of the village.

The site lies within close proximity and short driving distance of the existing community services and local facilities of Nantgaredig. It will also benefit from well served excellent public transport links to the nearby settlements, specifically the towns of Llandeilo and Carmarthen, together with other locations within and adjoining the County.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**





*Representation(s)*

**3848 Mr A Douch [593]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Objection to the exclusion of candidate site SR/117/006 under Policy HOM1.

The Candidate Site forms a logical extension to the existing settlement, being well related to established residential development.

The site lies within close proximity and walking distance of the existing community services and local facilities of Nantgaredig - particularly the Primary School and Medical Surgery, which will ensure it makes a positive contribution to both national and local sustainable development objectives.

The Site also benefits from well served excellent public transport links to the nearby settlements, specifically the towns of Llandeilo and Carmarthen.

The Site has no access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3962 Ms and Mr L & E Edwards [5103] Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Objection to the exclusion of candidate site ref SR/076/003 under policy HOM1.

The Candidate Site comprised of part of a single enclosure, with its northern boundary fronting onto the adjoining public highway, from which access to it was gained. Its eastern and western boundaries are then well defined by existing development, whilst it's remaining southern boundary then leads on to the remainder of the agricultural enclosure it forms part of. The land therefore clearly represented a logical infill opportunity within the settlement and its extents are illustrated by the red line

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**Whilst it is acknowledged that the site has been reduced in size since the one submitted as at the candidate site stage, the reasons for the non inclusion of this smaller site nevertheless remain the same.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4059 Mr E Hughes [5126] Object**

**Agent: Roger Parry & Partners LLP (Richard Corbett) [2925]**

*Summary:*

The site is available and deliverable and is suitable for development for the following reasons: i) the site is well related in both physical and visual terms to existing development, is in character with the adjoining housing and would be a logical extension to Llangadog ii) the development and its future households will contribute to the economy and help Llangadog retain the critical mass necessary to retain services and facilities iii) there is active interest in developing the site (named party/developer). This is therefore an objection to the exclusion of candidate site ref SR/090/002 under policy HOM1 - site ref AS/090/002

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4401 E Thomas [5165]**

**Object**

*Summary:*

Objection to the exclusion of a new candidate site AS/099/007 under policy HOM1. The area of land should be included within the Deposit Plan as a residential site allocation. The site is 1.7 hectares and would be able to accommodate approximately 40 dwellings. The site borders on the main settlement area of the village, with the village shop, school and amenities within walking distance. It is within a speed-restricted area, making it safer, and more suitable to walk to the village amenities.

**4402 E Thomas [5165]**

**Object**

*Summary:*

Objection to the exclusion of a new candidate site AS/099/008 under policy HOM1. The area of land should be included within the Deposit Plan as a residential site allocation. The site is 1.7 hectares and would be able to accommodate approximately 40 dwellings. The site borders on the main settlement area of the village, with the village shop, school and amenities within walking distance. It is within a speed-restricted area, making it safer, and more suitable to walk to the village amenities.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. There is sufficient and more suitable land available for residential development within the town/village to accommodate its housing needs. The site is detached from the main built up part of Llanllwni and would result in a fragmented development.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4086 Mr G Green [5137]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Objection to the exclusion of candidate site ref SR/080/007 under policy HOM1.

We consider its exclusion to be an erroneous decision by the Authority and consider therefore that the LDP is "unsound" and should be changed.

The Site lies within close proximity and walking distance of the existing community services and local facilities of Ffairfach, which will ensure it makes a positive contribution to both national and local sustainable development objectives. Furthermore, the Site will also benefit from well served excellent public transport links to the larger towns of Llandeilo, Carmarthen and Ammanford.

Within the Candidate Site having no access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints, its delivery if allocated is assured.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4113 Mr M Jones [5147]**

**Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Object to the non inclusion of candidate site SR/080/002 from the Revised LDP

We consider site's exclusion to be an erroneous decision by the Authority and consider therefore that the LDP is "unsound" and should be changed.

The Candidate Site forms a logical extension to the current form of Llandeilo, and the Site's development could be delivered without resulting in a detriment to visual amenity in the immediate and wider setting of the landscape and adjoining settlement.

In addition, the Site lies within close proximity and walking distance of the existing community services and local facilities of Llandeilo which will ensure it makes a positive contribution to both national and local sustainable development objectives.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4457 Aled & Sarah Jones & Holmes [3654]**

**Object**

*Summary:*

Due to Covid-19 and the probable recession that will follow, and the effect this will have on the rate of development, there is a strong case that more smaller sites should be allocated, so as to minimise the risk for the Local Authority, thus ensuring supply is maintained throughout the plan period. More smaller sites will also benefit the local supply chain. Candidate site SR/021/021 should be allocated to address these concerns.

*Council's Initial Response*

**The land has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the land. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence. There is sufficient and more suitable land available for residential development within Carmarthen to accommodate its housing needs.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4556 Ms J Wilkinson [5292]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

The inclusion of this site within revised development limits for Capel Dewi would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

In addition, residential development at this location:-

- would not be detrimental to the amenity of adjacent properties;
- would satisfy recognised housing and sustainability objectives;
- would not have a detrimental impact on the landscape or nature conservation interests.

Furthermore, the site is not impeded by any access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints and its delivery, if allocated, is assured.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4549 Mr D L Thomas [5290]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

The inclusion of this site within the development limits for Llandeilo would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

In addition, residential development at this location:-

- would not be detrimental to the amenity of adjacent properties;
- would satisfy recognised housing and sustainability objectives;
- would not have a detrimental impact on the landscape or nature conservation interests.

Access to this site would be achieved via the proposed adjoining Glynceirch development land, as identified in the current LDP.

Furthermore, the site is not impeded by any ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints and its delivery, if allocated, is assured.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3768 Mr Lynn Griffiths [3589]**

**Object**

*Summary:*

Objection to the exclusion of current LDP allocation T2/2/h5, candidate site ref SR/08/009 under policy HOM1.

The Initial Assessment published in December 2018 raised no fundamental objection and a more detailed analysis demonstrates that the site is suitable for development.

With regard to the concerns over the deliverability of the site, there have been attempts to bring the development to market with the application lodged in 2009 being withdrawn over uncertainty over the proposed Llandeilo bypass leading to conflicting requirement over the access. In 2015 approaches from a developer were not pursued due to personal reasons however recent enquiries are demonstrated progression of the site is possible.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3773 Mr M Scarlioli [5054]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection, seeking allocation of a new proposed residential site in Llandeilo under policy HOM1.

The inclusion of this site within the development limits for Llandeilo would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

In addition, residential development at this location:-

- \* would not be detrimental to the amenity of adjacent properties;
- \* would satisfy recognised housing and sustainability objectives;
- \* would not have a detrimental impact on the landscape or nature conservation interests.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table (refer to the assessment of current LDP allocation T2/2/h1, of which this site forms a part). The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and he supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3903 Davies Richards Developments Ltd (N/A N/A N/A) [5087] Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Object to the exclusion of candidate site SR/080/013 under Policy HOM1.

The Site forms a logical expansion of the existing settlement's urban form and lies within close proximity and walking distance of the existing community services and local facilities of the adjoining settlement.

From a wider sense, the Site will also benefit from well served excellent public transport links to the nearby settlements, the larger towns of Ammanford and Carmarthen.

With the Candidate Site having no access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints, its delivery if allocated is assured. Combined therefore with its locational characteristics, the Site in question represents a sustainable candidate for future housing development.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table (site ref: SR/080/013). The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4109 Mr & Mrs G Mainwaring [5144]**

**Object**

**Agent: Mr Stuart Owen [731]**

*Summary:*

Objection to the exclusion of part of candidate site SR/080/004.

The site adjoins current development limits and existing built form, has good horizontal and vertical visibility on to Heol Myrddin, and would reflect the in depth form of recent development in the locality.

Whilst it is understood that the original candidate site proposing 101 dwellings may be considered inappropriate, what does also appear to be inappropriate is the total imbalance of allocated residential sites, with all three clustered in Llandeilo and none in Ffairfach.

So what is now put forward as a revised submission on just 0.824 hectares of the original site is a residential allocation of low cost/affordable housing, offered on completion to a housing Association for a reduced rate to market value.

This form of development would make an invaluable contribution to the social fabric of the town.

*Council's Initial Response*

**This site forms part of site that has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table (site ref: SR/080/004). The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**Whilst it is acknowledged that the site is much smaller than SR/080/004, there is sufficient residential land allocated within the Llandeilo/Ffairfach area. The site will remain excluded from residential allocation and from within the development limits.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3779 Mr T E Hughes [5056]**

**Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Objection to the exclusion of part of candidate site reference SR/090/001 and seeking its inclusion within the revised LDP.

The Council consider that the allocation of the whole site for the purposes of residential development is unnecessary due to their view that alternative allocations within Llangadog will deliver sufficient housing for the settlement.

We however consider the exclusion of the southern portion of the site to be an erroneous decision by the Authority. Llangadog with its associated high level of community facilities, local services and recently expanded Primary School has asignificantly higher level of sustainability than the proposed level of housing provision by the Deposit LDP gives it merit for. In fact, due to its close proximity to the A40 Trunk Road, the settlement serves a wider catchment than that of its current physical extents.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table (site ref: SR/090/001). The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3878 Dr William D Rees [541]**

**Object**

*Summary:*

Objection to the exclusion of a site for housing.

I would like to suggest that the land off Maesywern Road, Glanamman be considered for inclusion in the LDP as a new site. You will note that part of this land was previously within the development boundary. The site is close to existing amenities and the Bro Ryan sheltered housing complex. The site has access to mains water and to the existing sewerage system. There is access to public transport with busses serving Bro Ryan.

*Council's Initial Response*

**There is sufficient residential land allocated within the settlement. The allocation of this site for housing site would constitute an unnecessary and illogical extension to the development limits.**

*Action*

**No change to the Plan.**

**Representation(s)**

**3943 Dr William D Rees [541]**

**Object**

*Summary:*

Objection to the exclusion of a site for housing.

I would like to suggest that the land off Llwynceilyn Road, Glanamman be considered for inclusion as a new site. The site has potential for residential housing. The site is close to existing amenities and there is access to public transport with a regular bus service on the main road.

**Council's Initial Response**

**There is sufficient residential land allocated within the settlement. The allocation of this site for housing site would constitute an unnecessary and illogical extension to the development limits.**

**Action**

**No change to the Plan.**

**Representation(s)**

**4024 Mr E Hughes [5126]**

**Object**

**Agent: Roger Parry & Partners LLP (Richard Corbett) [2925]**

*Summary:*

The site would provide for future growth needs in the Manordeilo/Cwmifor/Penybanc Ward with land for up to 5 dwellings. This submission promotes a highly suitable site that would help meet the housing needs of the area. The land is available for development within the next LDP period. It is available and deliverable with active interest in developing the site. Objection policy HOM1 - Site reference AS/005/002. Reference is made to representation 4022 also.

**Council's Initial Response**

**This site is located to the south east of the village of Ashfield Row from which it is detached from and separated by the A40.**

**Ashfield Row has itself been classified as a settlement within Tier 4 of the settlement hierarchy and therefore does not have development limits. Any site proposal within or adjacent to Ashfield Row will be considered under policies set out within the revised LDP, most notably Policy HOM3.**

**Action**

**No change to the Plan.**

*Representation(s)*

**4106 Mr A Thomas [4025]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the part exclusion of former LDP allocation SC30/h1 under policy HOM1. Part of the site has been allocated and given the reference number SuV51/h1.

The justification for including only part of the objector's land will apply to all of the field.

Inclusion of the whole field would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site forms part of an existing residential allocation in the current LDP (SeC30/h1). The allocation has been reduced in size in the Deposit Revised LDP and the objection site is the part that has been excluded.**

**The overall site (SeC30/h1) has been duly considered in the formulation and preparation of the LDP with the reasons for the reduction in size set out within the Site Assessment Table. Whilst it is acknowledged there is a current planning application for three dwellings on the front portion of the current allocation, the representation raises no additional information to justify inclusion of the objection site.**

**The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

=====

*Representation(s)*

**4381 Mrs H Wight [5000]**

**Object**

**Agent: Geraint John Planning Ltd (Mr Luke Grattarola) [685]**

*Summary:*

Objection to the exclusion of current LDP allocation T3/9/h4 under policy HOM1:

\* The site benefits from a close association and connection with the services and facilities provided within Brynamman, which are situated within convenient walking distance (which would facilitate sustainable growth of the settlement).

\* The sustainability and accessibility credentials of the site lend themselves to supporting residential development at this location - several bus stops are located immediately north of the site on Cwmgarw Road.

\* It is considered that the inclusion of this land for residential development will assist the Local Authority in meeting their housing needs provision.

\* The site is wholly deliverable and can realistically come forward within the early years of the Plan period.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table (reference: T3/9/h4). The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4387 Harold Metcalfe Partnership (Mr D A Jones) [706] Object**

*Summary:*

Objection to the exclusion of a site (part of candidate site SR/015/007) under policy HOM1.

This is a smaller parcel of land that could be considered with a development to the south of the plot as shown highlighted in green on the attached plan.

This site will allow an opportunity to provide an estate, in comparison with the ribbon development which is the general arrangement along Cwmgarw Road.

Mains water and electricity are available in the vicinity of the site.

There is no issue with flooding.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table (reference: SR/115/007). The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**Whilst it is noted that this objection site is smaller than site SR/115/007, the same reasons for non-inclusion of the site apply.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4571 Mr Brian Birch [5297] Object**

**Agent: Asbri Planning Ltd (Mr Keith Warren) [592]**

*Summary:*

Objection to Policy HOM1 - in that the site should be allocated for housing development and shown as such on the Proposals Map.

The site has benefitted from previous planning permissions and as part of an allocation in the former Unitary Development Plan. However the number of units has been reduced to 11 in order to address flood risk issues associated with land to the south. The site area has also been reduced accordingly.

A layout drawing has been prepared which shows a scheme along the frontage of Tan-Y-Gelli which links existing development to the west and east and rounds off the settlement pattern at this location.

A Sustainability Assessment (SA) is provided which shows that the development of the site would meet the LDP SA objectives.

*Council's Initial Response*

**Sufficient residential opportunities exist within the settlement.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4498 Neil Evans [5187]**

**Object**

*Summary:*

We seek the amendment of the development limits to include the site for residential development. Our ambition is for the site to offer suitable homes for 1st / 2nd time buyers, hopefully with, or wanting to start a family, who will benefit immensely from all the amenities this site location can offer. Homes suitable for those who want to stay locally but may be forced away from the locality by the current costs of local housing. The site can be serviced via safe and appropriate access points and is viable with water, electricity, superfast broadband & good access to the site. A detailed supporting statement is provided with the representation.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. There is sufficient and more suitable land available for residential development within the town/village to accommodate its housing needs.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4499 J E Rees & Son [5264]**

**Object**

**Agent: Feniton Park Ltd (Paul Willis) [5263]**

*Summary:*

Site Sc1/h2 Land adjacent to Aweldeg, Felindre is allocated for residential development of 30 dwellings in the current Carmarthenshire LDPlan. The site was granted outline planning permission for residential development on 24/10/89. The site is ready for the delivery of 30 dwellings and could be started within 2 years and completed within 4 years. It is able to make a rapid contribution to housing supply and delivery. The site should continue to be allocated for residential development in the Revised LDP.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. There is sufficient and more suitable land available for residential development within the Drefach Felindre to accommodate its housing needs. There are concerns about the delivery of the site, planning permission has been granted on the site in 1989 and has not been delivered in this time. It is for this reason that the site has been removed as a housing allocation.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3981 Sancler 3 Ltd ( \_ \_ \_ ) [5112]**

**Object**

**Agent: Avison Young (Michael Southall) [755]**

*Summary:*

Objection under Policy HOM1 seeking the inclusion of a new candidate site in Pontwelly (part allocation SC21/h1 in current LDP. The site comprises a residential allocation in the adopted LDP and benefits from extant outline planning permission for the development of 14 no. dwellings. Most recently, a Section 73 application has been submitted to the council to extend the time period for the submission of further reserved matters applications on the remaining plots for a further 5 years.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. There is sufficient and more suitable land available for residential development within the town/village to accommodate its housing needs. There are concerns about the delivery of the site, planning permission has been granted on the site for many years, dating at least from 1986 for residential development with no signs of delivery. It is for this reason that the site has been removed as a housing allocation.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4522 Mr P G Head [5283]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

It is considered that the site (AS/145/004) is a suitable site for housing. It lies opposite a current residential development and can be considered as a logical addition to Rhydargaeau. A detailed supporting statement is provided to support the representation.

*Council's Initial Response*

**The land has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the land. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence. There is sufficient and more suitable land available for residential development within the town/village to accommodate its housing needs.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4536 Mr Richard Moses [409]**

**Object**

*Summary:*

The site is considered suitable for residential development as it is the next phase to existing development SuV10/01.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. There is sufficient and more suitable land available for residential development within the town/village to accommodate its housing needs.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3687 West Wales Developments Ltd (Nigel & Jane Evans) [859]**

**Object**

*Summary:*

Object to the non-inclusion of candidate site SR/149/008 from the LDP, and provides a supporting statement for its inclusion.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3689 West Wales Developments Ltd (Nigel & Jane Evans) [859]**

**Object**

*Summary:*

Object to policy HOM1 and the non-inclusion of SR/132/003 from the LDP. The representaiton also provides a supporting statement to promote the site's inclusion.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4591 Ceredigion County Council (Anjuli Davies) [5303]**

**Object**

*Summary:*

To summarise the numbers of units planned in relevant cross-border settlements is:

Newcastle Emlyn = 51

Llanybydder = 63

Cwmann - 50

Pontyweli = 19

Ceredigion County Council is particularly concerned that the level of growth planned in Cwmann and Pontyweli will detract from meeting housing needs within the service centres of Lampeter and Llandysul. If these levels of growth are retained, Ceredigion County Council would welcome a strong emphasis on the provision of affordable housing for local people within allocated sites. Furthermore, in considering an appropriate scale of growth for these settlements, the level of growth planned in Llanybydder and Cwmann is considered high and could absorb housing demand from within Ceredigion.

*Council's Initial Response*

**Noted. The strategy of the revised LDP seeks to support the distribution of housing and economic growth which is of a scale and nature appropriate to its cluster. In this respect the revised LDP seeks to ensure that development is appropriate its settlements and reflective of their ability to accommodate growth and the services and facilities available.**

**The revised LDP makes provision for affordable homes on allocated site in conjunction with policy AHOM1 of the Plan. The council will seek to maximise the delivery of affordable homes during the plan period.**

*Action*

**No change to the Plan**

=====

*Representation(s)*

**4420 Julie & Ian Evan Jones [5166]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

The inclusion of part SR/004/028 within the development limits for Betws would not lead to additional environment pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4607 Mrs C M Bevan [4250]**

**Object**

*Summary:*

Objection to Policy HOM1 due to the exclusion of Abertrinant Fields, Carmel in the Deposit Revised LDP. The fields amount to 30 acres and are located adjacent to the development limits of Carmel in the current LDP. We would like the site included for housing in the Revised LDP.

*Council's Initial Response*

**The site does not accord with Stage 2 (Phase 2b) of the Site Assessment Methodology in that it would be an illogical extension to the settlement and impact upon the rural character of this area of Carmel.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4608 ms roxane lawrence [2986] Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of candidate site reference SR/004/001 from the revised LDP.

**4609 ms roxane lawrence [2986] Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of candidate site reference SR/004/003 from the revised LDP.

**4610 ms roxane lawrence [2986] Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of candidate site reference SR/004/041 from the revised LDP.

**4611 ms roxane lawrence [2986] Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of candidate site reference SR/004/002 from the revised LDP.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan**

*Representation(s)*

**4554 Mr R Robinson [4092]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

The site's inclusion within reinstated development limits for Capel Seion would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type.

Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

In addition, residential development at this location:-

- \* would not be detrimental to the amenity of adjacent properties;
- \* would satisfy recognised housing and sustainability objectives;
- \* would not have a detrimental impact on the landscape or nature conservation interests.

Furthermore, the site is not impeded by any access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints and its delivery, if allocated, is assured.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table.**

**Capel Seion has been defined as a Tier 4 settlement, and therefore the village does not have development limits. Any proposal will be considered against the policies set out within Policy HOM3 of the revised LDP.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3995 Westacres (- Westacres -) [5116] Object**

**Agent: Asbri Planning Limited (Mr Richard Bowen) [591]**

*Summary:*

Objection to Policy SD1 - seeks an increase to the area of housing allocation PrC3/h18 and the consequent area included within development limits.

The proposed housing land allocation under Candidate Site Reference PrC3/h18 which provides for the development of the site for an indicative number of 29 units is initially welcomed.

Notwithstanding the above, this submission therefore objects to the Deposit Plan on the grounds that the larger area of land should be included as a housing land allocation PrC3/h18. A Sustainability Assessment (SA) is provided at Appendix F which shows that the development of the site would meet the Deposit Plan SA objectives.

*Council's Initial Response*

**The inclusion of the Candidate Site would result in an illogical extension to the settlement, whilst there is sufficient and more suitable land available elsewhere in the settlement to accommodate it's housing need.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4557 Ms S McNeill [5293] Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

The inclusion of this land within revised development limits for Cross Hands would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type.

Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

In addition, residential development at this location:-

- \* would not be detrimental to the amenity of adjacent properties;
- \* would satisfy recognised housing and sustainability objectives;
- \* would not have a detrimental impact on the landscape or nature conservation interests.

Furthermore, the site is not impeded by any access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints and its delivery, if allocated, is assured.

*Council's Initial Response*

**Development of the site would result in a ribbon pattern of development contrary to general planning principles.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4560 K, D, E & G Fakes, James, Roberts & Jones [5296] Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Seeking the allocation of a new alternative site within the Deposit Revised LDP. Although currently undeveloped, the Alternative Site forms a logical extension to the existing settlement, being well related to and encapsulated by it, as well as being positioned at a location within the wider landscape to not form a prominent or logical part of the surrounding open countryside. From a wider sense the site also benefits from well served excellent public transport. With the Alternative Site having no access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints, its delivery if allocated is assured. Combined therefore with its locational characteristics, the Site in question represents a sustainable candidate for future housing development.

**4142 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:**

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

*Summary:*

We respectfully request the site's allocation for residential development. It is deliverable in the short-medium for up to 67 homes and is free from environmental constraints - it is evidently deliverable in the short term. Planning Policy Wales edition 10 makes clear that sites should be free or readily freed from planning, physical and ownership constraints and be economically viable. Whilst the land at Church Road, Gorslas site does not utilise previously developed land, it does utilise land at the edge of a settlement that would form a logical extension to the settlement which encompasses all necessary elements, meets the Sustainability Assessment criteria and is clearly deliverable / viable in the short term. In regards to site deliverability / viability, a note has been prepared and submitted. A Masterplan is provided. This is an objection to the non allocation of candidate site SR/067/002 (site ref. AS/067/002) from the Plan under policy HOM1. A response is provided by the representor in respect of the Council's reasons for the candidate site's failure at stage 2b of the site assessment process. Reference can be made to representation 4143, whilst a series of objections have been made to a number of allocations in the County - including sites within PrC3.

*Council's Initial Response*

**There is sufficient and more suitable land available within the area to accommodate the settlement's housing need.**

*Action*

**No change to the Plan.**

*Representation(s)*

4525 J Eirian Thomas [2907]

Object

*Summary:*

Objection to the exclusion of SR/067/007 from within the Deposit Revised LDP

*Council's Initial Response*

The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.

*Action*

No change to the Plan.

*Representation(s)*

4413 Mrs V, Mrs A, Mr E, Mr & Mrs J. Davies, Davies, Davies & Davies [5096] Object

*Agent: Evans Banks Planning Limited (Richard Banks) [4967]*

*Summary:*

Object to the exclusion of site SR/082/002 from the housing allocations as being suitable for 5 units.

*Council's Initial Response*

The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.

*Action*

No change to the Plan.

*Representation(s)***4213 Mr C Howells [5048]****Object*****Agent: Nicole Jones (Nicole Jones) [704]******Summary:***

This site has many attributes and is appropriately situated in close physical proximity to the existing built form. It can be seen as a logical extension of the village boundaries and would not result in an intrusion into open countryside or a ribbon development -it would not lead to additional environmental pressure. Careful consideration has to be given to the style of any future development, however with the site sitting below the road level any development would be visually unobtrusive. Further investigation should be taken into the vegetation and animal life at these fields - however there are no mature trees or wooded areas that would impact development. The existing footpath could easily be incorporated into any future development by diverting it. This would protect the brock at the western boundary as well as maintain a natural habitat for wildlife. An increase of traffic would occur by this possible small development, however with an existing access onto the main road of Heol Blaenhirwaun, the local housing sites would not be affected. All surrounding main roads would cope. Any development would have a positive effect on the local economy and local community's well-being by providing homes at a sustainable location in a growth area. Realignment of the LDP's development limits to a more logical physical edge to the settlement - inclusion of this site. In addition, the inclusion of this site will provide for an improved access to development site GA3/h51, which is currently facing technical difficulties in bringing an access alongside Bron-Yr-Ynn housing estate. Objection to the non inclusion of candidate site SR/049/007 (site ref AS/049/007) under policy HOM1. Reference may be made to reps 4212 & 3739.

**4212 Mr C Howells [5048]****Object*****Agent: Nicole Jones (Nicole Jones) [704]******Summary:***

This site has many attributes and is appropriately situated in close physical proximity to the existing built form. It can be seen as a logical extension of the village boundaries and would not result in an intrusion into open countryside or a ribbon development -it would not lead to additional environmental pressure. Careful consideration has to be given to the style of any future development, however with the site sitting below the road level any development would be visually unobtrusive. Further investigation should be taken into the vegetation and animal life at these fields - however there are no mature trees or wooded areas that would impact development. The existing footpath could easily be incorporated into any future development by diverting it. This would protect the brock at the western boundary as well as maintain a natural habitat for wildlife. An increase of traffic would occur by this possible small development, however with an existing access onto the main road of Heol Blaenhirwaun, the local housing sites would not be affected. All surrounding main roads would cope. Any development would have a positive effect on the local economy and local community's well-being by providing homes at a sustainable location in a growth area. Realignment of the LDP's development limits to a more logical physical edge to the settlement - inclusion of this site. In addition, the inclusion of this site will provide for an improved access to development site GA3/h51, which is currently facing technical difficulties in bringing an access alongside Bron-Yr-Ynn housing estate. Objection to the non inclusion of candidate site SR/049/009 (site ref AS/049/009) under policy HOM1. Reference may be made to reps 4213 & 3739.

*Council's Initial Response*

The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.

*Action*

**No change to the Plan.**



*Representation(s)*

**3376 Barratt David Wilson Homes (Mrs Francesca Evans) [4879]**

**Object**

*Summary:*

BDW wish to add a new site allocation - Land off Heol-y-Mynydd, Bryn, previously submitted as a Candidate Site (ref. no. SR/086/053). Please see attached documents in support of this submission.

Council Summary (extracted text from detailed submission): BDW has prepared a site-specific representation in support of the proposed allocation of Land off Heol-y-Mynydd, Bryn for residential use within the Deposit Revised Carmarthenshire Local Development Plan. This was previously submitted at the Candidate Sites stage of the LDP's preparation together with a Candidate Site Assessment Questionnaire. The proposed allocation of Land off Heol-y-Mynydd, Bryn for residential development within the LDP is fully compliant with the requirements of local and national planning policy as well as the Well-being of Future Generations (Wales) Act 2015. We have undertaken a number of technical studies which support the allocation of the Site for residential use, and there are no other identified constraints which would prevent the Site from coming forward. Moreover, the Site falls entirely within the boundary of a single title and a national housebuilder is actively promoting the Site. Accordingly, the Site is considered to be readily freed from physical and ownership constraints and is capable of making a significant contribution to the Council's supply of housing land in the short-to-medium term, in accordance with PPW. In light of the above, we respectfully request that Land off Heol-y-Mynydd, Bryn is included within the emerging LDP as a residential allocation for up to 160 homes. This is an objection to the non allocation of candidate site SR/086/053 under policy HOM1 - site reference AS/086/053.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**As a cross reference aid - reference can also be made to the Council's response to a range of other representations which were made as part of promoting this site. This includes the Council's response to objections made to housing allocations in the Plan which can be viewed under the Council's responses to comments received under policy HOM1 - housing allocations - whilst the Council's response to representation reference number 3375 can be viewed under the Council's responses to comments received under policy MR3: Mineral Safeguarding.**

*Action*

**No change to the Plan**



**Representation(s)****4094 John Price [2620]****Object****Summary:**

Yn gwrthwynebu peidio â chynnwys SR/067/001 o'r CDLI adneuo ac yn ceisio ei gynnwys.

Objects to the non-inclusion of SR /067/001 from the Deposit LDP and seeks its inclusion.

I gloi mae'r cynllun yn arloesol mewn sawl ffordd; Tai fforddiadwy, Byngalos ar gyfer yr henoed, Cyfle i nifer o bobl leol prynu plot adeiladu er mwyn i adeiladu tai ei hunain Pensaeriaeth arloesol. Defnyddio technoleg ddiweddaraf i adeiladu tai Cynaliadwy Eco cyfeillgar. Ardal wyrdd gymunedol. Creu cymuned clos. Cynorthwyo i Ddiogelu'r iaith Cymraeg.

**Council's Initial Response**

**Ystyriwyd y safle'n briodol wrth lunio a pharatoi'r CDLI gyda'r rhesymau dros beidio â chynnwys yn y CDLI wedi'i nodi yn y Tabl Asesu Safleoedd. Nid yw'r sylwad yma yn codi unrhyw wybodaeth ychwanegol i gyfiawnhau cynnwys y safle newydd a awgrymir. Roedd y gwaith o asesu safleoedd yn cael ei gynnal yn unol â chanllawiau cenedlaethol a'r methodoleg asesu'r safle a phapurau cefndir/pwnc a'r dystiolaeth ategol.**

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence**

**Action**

**Dim newidiad i'r Cynllun.**

**No change to the Plan.**

=====

*Representation(s)*

**4091 Jonathan Edwards MP (Jonathan Edwards ) [4049]**

**Object**

*Summary:*

Objection to the exclusion of candidate site ref SR/159/008, and seeks its inclusion within the revised LDP.

The proposed land adjoins the development limits. Development has been undertaken to the east where four houses have been built to the rear of the Hendre Road frontage. The proposed site is a natural and logical extension to the existing settlement.

I am very critical of the local authority's approach of granting planning permission for housing estates for hundreds of dwellings. A development of this small size on the land proposed to be included in the local development plan is far more sustainable. It would also be sustainable when construction work is undertaken by small local building companies rather than big multinationals, with the local economy benefiting.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4080 Davies Richards Developments Ltd (N/A N/A N/A) [5087] Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Objection to the exclusion of candidate site SR/082/012 under policy HOM1.

We consider its exclusion to be an erroneous decision by the Authority and consider therefore that the LDP is "unsound" and should be changed.

The Site represents a sustainable and deliverable opportunity to provide new housing for the settlement of Llandybie in a strategic fashion, as well as the larger Growth Area it forms part of. With the land already capable of being easily served by all services and an adopted means of access by virtue of the adjoining public highway, there are no barriers to its delivery within the early stages of the forthcoming Plan.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4069 Llannon Community Council (Ms Susan James) [5134] Object**

*Summary:*

We seek inclusion of candidate site referenced SR/031/006.

Local residents have highlighted concern over the current state of the site and anti-social use by young people. We understand that part of the site is listed under the Haywood Homes development, but we ask that the unassigned piece of brown land also be considered on the LDP plan.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4019 Mr & Mrs Davies [5123]**

**Object**

**Agent: Aspinalls Planning & Legal (David Lucas) [5125]**

*Summary:*

Objection to Policy HOM1 - and the representation provides a supporting statement seeking the inclusion of SR/004/004 into the revised LDP

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4008 Mr Clive Douch [2924]**

**Object**

**Agent: Nicole Jones (Nicole Jones) [704]**

*Summary:*

Objection to the exclusion of candidate site SR/138/008 under Policy HOM1.

It is worth emphasising that the site:

- \* will help sustain the community by providing dwellings in a location that reinforces the traditional settlement pattern;
- \* would fully comply with established planning policies that direct development to sustainable locations in terms of proximity to urban facilities and a public transport route.
- \* it is closely related to the main public transport corridors;
- \* the site is conveniently located in terms of schools and other services and facilities;
- \* the site is not constrained by any significant environmental considerations, including ecological designations;
- \* it will be contained within existing defensible boundaries and will not give rise to any harmful precedent for further residential development.

**4009 Mr Clive Douch [2924]**

**Object**

**Agent: Nicole Jones (Nicole Jones) [704]**

*Summary:*

Objection to the exclusion of candidate site SR/138/007 under Policy HOM1.

It is worth emphasising that the site:

- \* will help sustain the community by providing dwellings in a location that reinforces the traditional settlement pattern;
- \* would fully comply with established planning policies that direct development to sustainable locations in terms of proximity to urban facilities and a public transport route.
- \* it is closely related to the main public transport corridors;
- \* the site is conveniently located in terms of schools and other services and facilities;
- \* the site is not constrained by any significant environmental considerations, including ecological designations;
- \* it will be contained within existing defensible boundaries and will not give rise to any harmful precedent for further residential development.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3998 Mr B Owen [5118]**

**Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Objection to the exclusion of candidate site reference SR/018/002 under policy HOM1.

We consider its exclusion to be an erroneous decision by the Authority and consider therefore that the LDP is "unsound" and should be changed.

The Site forms a logical extension to the existing settlement, being well related to it and being positioned at a location within the wider landscape.

The Site lies within close proximity and walking distance of the existing community services and local facilities of the adjoining settlement.

The Site also benefits from well served excellent public transport links to the nearby settlements, the larger towns of Ammanford and Cross Hands.

The development of the Site will in turn ensure a deliverable source of future housing for the settlement and Growth Area in which it lies.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3963 Mr Harries Mrs Sainty [5104]**

**Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Objection to the exclusion candidate site ref SR/067/012.

Seeking inclusion of their land for future residential development within the defined settlement limits of Gorslas within the Revised Local Development Plan. The Candidate Site comprises an undeveloped field enclosure set primarily to the rear of residential properties which front the eastern flank of Church Road in Gorslas. The site has an undeveloped plot which lies between detached houses on Church Road which leads directly to the field at the rear.

We have noted that the frontage plot is included within the draft settlement limits, however the adjoining, rear field has not been included. This formal Representation relates solely to the unsuccessful part of the Candidate Site.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3952 Ms & Mr England & Davies [5102]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Objection to the exclusion of site ref SR/149/010 under policy HOM1

The Site forms a logical addition to the existing settlement, being well related to it on two sides and representing an opportunity to complete an otherwise undeveloped frontage element of its principle access route.

The Site lies within close proximity and walking distance of the existing community services and local facilities of the adjoining settlement, which will ensure it makes a positive contribution to both national and local sustainable development objectives. The Site also benefits from well served excellent public transport links to the nearby settlements, the larger town of Ammanford,

The development of the Site will ensure a deliverable source of future housing for the settlement and Growth Area.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3945 Landview Developments [5100]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Objection to the exclusion of candidate site SR/004/0032 under policy HOM1

This Representation has sought to examine the Council's reasons for non-allocation of a Candidate Site. It has successfully addressed the reason put forward by the Authority for its exclusion and has identified that currently proposed allocations are undeliverable.

The development of the site for the purposes of residential development can be undertaken in a manner that would not result in a form of overdevelopment, an instance of ribboning, nor would it result in a detriment to any ecological, highway safety, flooding, contamination or amenity related interest.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4488 Mr Dewi Rees [355]**

**Object**

*Summary:*

Seeking the inclusion of field no.9640 as a new residential site within the Deposit Revised LDP. Also seeking the siting of a small organic farm.

*Council's Initial Response*

**There is sufficient and more suitable land available within the area to accommodate its housing needs.**

**With respect to the representation relating to an organic farm, the use proposed will be considered against the policies set out within the revised LDP.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4497 Mr Bryn Jones [3991]**

**Object**

**Agent: Asbri Planning Limited (Mr Richard Bowen) [591]**

*Summary:*

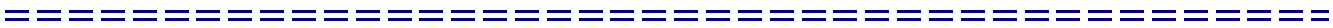
Objection to policy HOM1 seeking the allocation of part of the candidate site SR/031/008 within the Deposit Revised LDP.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4405 Julie & Ian Evan Jones [5166]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

The inclusion of part SR/004/027 within the development limits for Betws would not lead to additional environment pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type.

Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

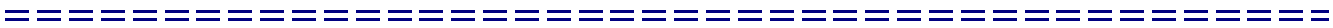
*Council's Initial Response*

**The inclusion of this site would lead to an inappropriate ribbon development of the settlement which would have a detrimental impact on the character of this area.**

**On the reference map, this site is identified as AS/004/047.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4039 Davies Richards Developments [5131]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Objection to non inclusion of SR/004/022 under policy HOM1 - site ref AS/004/022. We consider its exclusion to be an erroneous decision by the Authority and consider therefore that the LDP is unsound. Alternative allocations within the settlement and wider growth area are neither appropriate nor deliverable (refer to site specific objection representations - including 4043). It is stated that this representation has sought to examine the Council's reasons for non-allocation of a Candidate Site and that it has successfully addressed the reason put forward by the Authority for its exclusion ( that there is sufficient and more suitable land available for residential development within the town to accommodate its housing need) and has identified that currently proposed allocations are undeliverable.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4421 Julie & Ian Evan Jones [5166]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

The inclusion of part SR/004/031 within the development limits for Betws would not lead to additional environment pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**On the reference map, this site is identified as AS/004/049, owing to the smaller area being considered.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3777 Mr Clive Douch [2924]**

**Object**

**Agent: Nicole Jones (Nicole Jones) [704]**

*Summary:*

Objection to the omission of current LDP allocation T3/6/h5 under Policy HOM1.

The site consists of a grassed parcel of land of a rectangular shape just South of the center of Pontyberem. The owner is in the process of maintaining an outline planning permission for 3 double story dwellings on the site. All services: mains water supply, foul sewer, electricity and high-speed electronic communications networks, are in Ashgrove.

Pontyberem is a small town which has all necessary amenities in close proximity.

The transport links to Carmarthen and Llanelli towns are well established and developed.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table (T3/6/h5). The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3819 Lightwood Planning (Mr Richard Walker) [5065]**

**Object**

*Summary:*

Against this background of the need for increased housing growth, additional land at Penygroes should be allocated. The Plan already allocates land for 290 homes across 5 sites and these these all have planning permission. (PrC3/MU1) and (PrC3/h22) (79 homes) account for 88% of proposed new homes.

Land west of Waterloo Road and south of Maesglas should be allocated.

A site plan and testing layout shows an indicative layout for 44 homes. The site is already contained on 3 sides, including the relatively recent development at Clos Ael-Y-Bryn.

We assess that the SA of this new candidate site is identical to that prepared by the Council or land adj Pant y Blodau (PrC3/h22) in respect of significant effects.

*Council's Initial Response*

**There is sufficient and more suitable land available for development within the settlement to accommodate its housing need.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3820 Mr L W Jones [5066]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

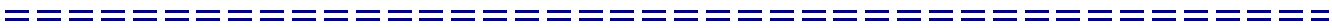
Seeks inclusion of area of land comprising new candidate site SR/159/018 and provides a supporting statement to promote the sites in inclusion as a housing allocation.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table (SR/159/013). The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3323 Mr Chris Lloyd [4928]**

**Object**

**Agent: M&M Design Consultancy (Mr Mike Morgan) [5022]**

*Summary:*

Aallocate the proposed site for residential development to meet the needs for local people. The site is an almost rectangular parcel of land which would logically round off the settlement limits to the north. The council has allocated a large housing site for residential development under SU41h1 for 19 dwellings. The proposed development would be a much suitable infill development than the proposed allocation. It would appear unreasonable that the Council has identified large Greenfield sites with no defensible boundary for development within the area and yet excluded this land from the village envelope when it is clearly a much more suitable parcel of land for development. The illustrative layout indicates 4 properties will front the main road and 5 properties via the existing access which serves a cluster of properties. The proposal could be easily amended and purely highlights how the site could be developed. The site is a more logical rounding off of the settlement. This is an objection to non inclusion of candidate site SR/070/004 (part) as a housing allocation. Reference is also made to representation 3322 where an objection to Heol Ddu as a Tier 4 settlement is made.

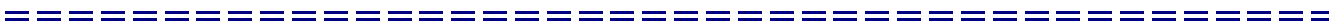
*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table.**

**Heol Ddu has been defined as a Tier 4 settlement, and therefore the village does not have development limits. Any proposal will be considered against the policies set out within Policy HOM3 of the revised LDP.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3968 Mr Stuart Thomas [5105]**

**Object**

**Agent: CDN Planning (Mr Graham Carlisle) [5017]**

*Summary:*

Seek the allocation of a new site AS/067/xxx within the Deposit LDP.

The site at Black Lion Road has an area of 4.3 hectares and based on a fairly low density of development it would provide in the region of 50 new houses. It is suggested, therefore, that serious consideration be given to the inclusion of this land as a new residential allocation. The site is in an attractive and sustainable location and there are no constraints to prevent an early start to the building process. As with all development plans the certainty of a site going forward within the plan period is all important. Other less attractive and potentially less viable sites could be set aside for this purpose.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence.**

**There is sufficient and more suitable land available for residential development within the town/village to accommodate its housing needs and the development would lead to the removal of extensive trees and hedgerows which would impact upon the character of the area.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4376 Mr R Robinson [4092]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of candidate site SR/020/002 under Policy HOM1.

Residential development at this location:-

- \* would not be detrimental to the amenity of adjacent properties;
- \* would satisfy recognised housing and sustainability objectives;
- \* would not have a detrimental impact on the landscape or nature conservation interests.

Furthermore, the site is not impeded by any access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints and its delivery, if allocated, is assured.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table.**

**Capel Seion has been defined as a Tier 4 settlement, and therefore the village does not have development limits. Any proposal will be considered against the policies set out within Policy HOM3 of the revised LDP.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3654 Lady Julie Romani [817]**

**Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Seek the inclusion of candidate site SR/149/002 under policy HOM1. The site consists of two enclosures, accessed either via an adjoining recently constructed residential development or the public highway. We have noted that the western part of the Candidate Site is included within the draft settlement limits, however the eastern portion has not been included within the draft settlement limits. This formal Representation relates solely to the unsuccessful part of the Candidate Site, with full support being given to the decision to include the western portion. A comprehensive accompanying report sets out further reasons to support the inclusion of the site.

*Council's Initial Response*

**There is sufficient and more appropriate residential land allocated within the settlement to accommodate its housing needs.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3893 T Richard Jones (Betws) Ltd (Owain Jones) [5084]**

**Object**

**Agent: Asbri Planning Ltd (Mr Keith Warren) [592]**

*Summary:*

Objection to the site's exclusion from Policy HOM1.

The site benefits from a planning permission - E/09709 for 4 pairs of semi-detached bungalows. Furthermore a start has been made on site, following the discharge of pre-commencement conditions.

This submission seeks therefore objects to the Deposit Plan on the grounds that the site be included as a housing land allocation, or at least identified as a commitment.

TRJ would therefore respectfully request that Carmarthenshire County Council considers these representations with a view to making appropriate Focused Changes to the Plan prior to its formal submission to the Planning Inspectorate.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The respondent notes that the site has permission dating back to 2000 which is extant, this is not sufficient to warrant it's inclusion as a housing allocation as no evidence of deliverability has been supplied. The site is located within the development limits and should the site be developed, it can be picked up within the windfall allowance.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3894 T Richard Jones (Betws) Ltd (Owain Jones) [5084]**

**Object**

**Agent: Asbri Planning Ltd (Mr Keith Warren) [592]**

*Summary:*

Objection to the exclusion of site from Policy HOM1.

The site represents the undeveloped part of a wider allocation - GA3/h9 in the adopted LDP.. The site benefits from reserved matters planning permission - E/24742, for 66 dwellings,. Furthermore a start has been made on site, following the discharge of pre-commencement conditions.

The site which represents the final phase of a mixed use residential and employment scheme on the former colliery site has an extant planning permission and should be included as a housing land allocation, or at least identified as a commitment.

TRJ Ltd would therefore respectfully request that Carmarthenshire County Council considers this representation with a view to making appropriate Focused Changes to the Plan prior to its formal submission to the Planning Inspectorate.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The respondent notes that the site has permission dating back to 2011 which is extant, this is not sufficient to warrant it's inclusion as a housing allocation as no evidence of deliverability has been supplied. Should the site be developed, it can be picked up within the windfall allowance.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3898 T Richard Jones (Betws) Ltd (Owain Jones) [5084] Object**  
**Agent: Asbri Planning Ltd (Mr Keith Warren) [592]**

*Summary:*

This submission objects to the Deposit Plan on the grounds that the site be included as a housing land allocation under Policy HOM1 to reflect its status in the adopted LDP - GA3/h54. The site has previously benefitted from a full planning permission - S/24072, for 10 bungalows, It is contained by existing residential uses and supported accommodation. The site should be allocated for 10 dwellings to reflect the previous planning permission and be identified accordingly on the Proposals Map. Supporting evidence is provided.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The respondent notes that the site has in the past benefitted from planning permission in the past which has now lapsed. This is not sufficient to warrant it's inclusion as a housing allocation as no evidence of deliverability has been supplied. There is sufficient and more suitable land available for residential development within the town/village to accommodate its housing needs.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3636 - - John Roberts Family Trust [5018] Object**  
**Agent: Barton Willmore (Joe Ayoubkhani) [646]**

*Summary:*

The site is allocated within the adopted LDP (GA3/h59) and benefits from planning permission S/31677 granted on 19/01/17. We therefore consider that the site should form part of an allocation for residential development in the Revised LDP.

The site is not within or near any statutory cultural heritage, landscape or ecological designations. There are no technical constraints on the site that cannot be overcome or would preclude development. The site is sustainably located, there are no pre-requisite infrastructural requirements to enable it to be developed, it is deliverable and in an area where there is demand.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3941 Pegasus Group (Daniel Millward) [5095]**

**Object**

*Summary:*

Objection to Policy HOM1 and seeking the inclusion of a new site.

The site is well related to development around the 6-way junction along the A476 in Gorslas which is home to a number of services and facilities that would meet the day to day needs of future residents.

The site is also well related to existing and future large-scale employment and commercial development areas at Cross Hands.

The site is free from any land use allocation or other designations that would otherwise constrain development; it could be made available for development in the short-term and be built out comfortably within a five-year time frame once detailed planning permission is granted.

*Council's Initial Response*

**There is sufficient and more suitable land available for development within the settlement to accommodate its housing need.**

**The Mineral Resource Map for Wales indicates that the site may contain high carbon soil.**

*Action*

**No change to the Plan.**





*Representation(s)*

**3969 Magnet Properties Limited ( \_ \_ \_ ) [5107]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Objection to the non-inclusion of the current adopted LDP allocation number GA3/h47 from the Deposit Revised LDP.

Our clients own a substantial land holding off the western flank of Carmarthen Road in Cross Hands, known locally as the "former Ennis Caravan site". It lies within the defined settlement limits of Cross Hands as contained within the 2014-adopted Local Development Plan and allocated for Residential Development as Site GA3/h47, capable of providing 80 dwellinghouses. We note that the western rear half of the site has been omitted from the settlement limits, and the whole site is no longer allocated for housing. Whilst our clients acknowledge some recognition of the role at least half of the site can play in bringing forward residential development in the Plan Period, we are concerned at the limitation applies to only half the land currently allocated in the 2014-adopted LDP

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**The site is currently a Reserve Site within the revised LDP. The list of reserved sites identifies those which may come forward as part of a plan review process. In this regard, the review will enable additional sites to be promoted where there may be issues in relation to plan delivery. Consequently opportunities will exist for this site to be considered as part of this review process.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4064 Mr Phil Mann [2574]**

**Object**

**Agent: Mr Stuart Owen [731]**

*Summary:*

We seek inclusion of a site which reflects a smaller area of the previously proposed candidate site SR/132/007. The site sits behind a road frontage development of 4 plots being developed by Mannor Homes. Sufficient land remains to provide satisfactory access to the site with an indicative layout of 6 bungalows. The area has good access to the A48 corridor. No site being developed near this proposed allocation proposes bungalows for local people, built by a local company, employing local tradesmen and labour.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence.**

**There is sufficient and more suitable land available for residential development within the settlement to accommodate its housing need.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4036 Mr & Mrs P & J Knight [3953]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Objection to the non-inclusion of part of SR/159/008 within the Deposit LDP under policy HOM1, therefore the new site reference is AS/159/017. Reference is made representation 4037 and it is argued that the deletion of that housing allocation means that houses should be redistributed to modest sites, of up to 15-25 units such as this one. There is clear evidence in Tycores, Capel Hendre and Saron that such modest sites are far more likely to be brought forward and developed in full by regional and small housebuilders given that construction and development costs are more likely to be viable in relation to house sales and the general housing market in this part of Carmarthenshire. The indicative proposals for this site are to construct circa 13-15 dwellinghouses as a second phase to the former commercial yard re-development, which will not appear at odds to the prevailing spatial pattern of development in Tycores and Saron.

*Council's Initial Response*

**The land has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the land. As part of this assessment process a detailed site pro forma has been prepared. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence. There is sufficient and more suitable land available for residential development within the town/village to accommodate its housing needs.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3975 Dolawen Cyf (Owain Jones) [3841]**

**Object**

**Agent: Asbri Planning Ltd (Mr Keith Warren) [592]**

*Summary:*

Objection to Policy HOM1, seeking inclusion of new site.

The site comprises candidate site SR/009/003 with additional land adjoining its northern boundary.

The site is well related to the existing settlement pattern, and its development will not result in any material harm in planning terms. Furthermore an agreement has been reached to provide a suitable access to the site.

There are no allocations proposed in the linked village of Caebryn/Blaenau.

This submission also seeks to demonstrate that the site is deliverable by a proven local building company and provisions would be incorporated which would seek to ensure a high quality of design and layout.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3916 Mr V Vijayasundaram [5091]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Objection to the exclusion of candidate site SR/064/015 under Policy HOM1.

The Site forms a logical extension to the existing settlement, and would be seen as a physical extension of the Maes-y-Beddol estate.

In addition, the site lies within close proximity and walking distance of the existing community services and local facilities of the settlements of Garnant and Glanamman which will ensure it makes a positive contribution to both national and local sustainable development objectives.

The Site also benefits from well served public transport links to the nearby settlements, specifically the town of Ammanford, together with other locations within and adjoining the County.

The Site has no access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table (SR/064/015). The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**No change to the Plan.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3106 sarah eyles [4645]**

**Support**

*Summary:*

Supports the exclusion of SR/088/006 (Candidate Site application for Land at Heol Mafon originally submitted by JCR Planning on behalf of Mr. M. Evans). There are a number of reasons for the objection of development at this location:

1. The effect of development on the solar farm which lies in close proximity to the site.
2. Western Power Distribution powerlines cross the site.

*Council's Initial Response*

**The support for the exclusion of site AS/088/006 is welcomed.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3399 Mr Jeff Davies [3781]**

**Support**

*Summary:*

Support the exclusion of site SR/098/001 from being a housing allocation for the following reasons:

- The B road leading to this proposed development is very narrow.
- Small bridge that only allows a single car at a time to cross, causing a lot of issues.
- Llanllwch village is already seeing increased traffic from the Travelers Rest housing development, this will only add to the daily congestion.
- Lack of visibility
- Narrow track leading into the site which I have right of way on, so I'm concerned that my rights may be affected, if this development went ahead.

**3120 Mr & Mrs C K Davies [4513]**

**Support**

*Summary:*

We live next to the site (SR/098/001) and strongly object to any developments.

The main reason for objection relates to traffic in in the village, using it as a shortcut which is causing concern for the highway safety. In addition to this site, the 1200 houses to be built at Travellers Rest will cause highway concerns. The infrastructure through the village is dangerous, due to narrow roads, a lack of footpaths and a narrow bridge. Access to the site is also a concern.

*Council's Initial Response*

**The respondent is objecting to the whole submitted candidate site, which consists of a large site. Whilst the majority of the site has been excluded from the development limits, part of the site is considered appropriate in terms of small scale rounding off, suitable for 1 or 2 plots.**

*Action*

**No change to the Plan.**

**Representation(s)**

**3198 Mr Lawrence Aldridge [495] Support**

*Summary:*

Supports the exclusion of AS/019/003 - (candidate site SR/019/003) - for residential development. The issues cited include determinantal impact on the character of the village, lack of amenities and population/traffic impact. It is stated that there is plentiful provision of building plots which are not being delivered. This representation is therefore supporting policy HOM1 of the Deposit Plan in that the site is not allocated for residential development.

**3200 Mr Lawrence Aldridge [495] Support**

*Summary:*

Supports the exclusion of AS/019/008 - (candidate site SR/019/008) - for residential development. The issues cited include determinantal impact on the character of the village, lack of amenities and population/traffic impact. It is stated that there is plentiful provision of building plots which are not being delivered. This representation is therefore supporting policy HOM1 of the Deposit Plan in that the site is not allocated for residential development.

**3197 Mr Lawrence Aldridge [495] Support**

*Summary:*

Supports the exclusion of AS/019/001 - (candidate site SR/019/001) - for residential development. The issues cited include determinantal impact on the character of the village, lack of amenities and population/traffic impact. It is stated that there is plentiful provision of building plots which are not being delivered. This representation is therefore supporting policy HOM1 of the Deposit Plan in that the site is not allocated for residential development.

**3202 Mr Lawrence Aldridge [495] Support**

*Summary:*

Supports the exclusion of AS/019/004 - (candidate site SR/019/004) - for residential development. The issues cited include determinantal impact on the character of the village, lack of amenities and population/traffic impact. It is stated that there is plentiful provision of building plots which are not being delivered. This representation is therefore supporting policy HOM1 of the Deposit Plan in that the site is not allocated for residential development.

**Council's Initial Response**

**Support for the exclusion of the site is welcomed.**

**Action**



*Representation(s)*

**3152 Mr Gwyn Lewis [4342] Support**

*Summary:*

Support the exclusion of SR/163/005 at Spring Gardens, Whitland.

**3137 Mr Christopher Bowen [2957] Support**

*Summary:*

Support the exclusion SR/163/005

I would like to object to any planning proposals relating to the above reference for land development at Ael-y-Bryn fields in Spring Gardens, Whitland.  
I previously objected to this development on the basis that it would obstruct the country views from our property and also de-value our home.  
The country views we're a huge deciding factor in our decision to purchase the property in December 2017.

**3136 Mr David Kirk [3848] Support**

*Summary:*

Support the exclusion of SR/163/005

1. There are a number of sites in Whitland with current planning approved that are not shown on the candidate sites plans , many on brown field sites so why apply to develop a green field site?
2. The above brown field sites are near all the amenities so why develop a green field site.
3. We would suffer immense loss of visual amenity if the above were to proceed.
4. Why not extend the Magstim development or some of the larger estates in Whitland.
5. Nothing is happening with the old Dairies site and hasn't for a number of years , why is this as it is central to the town and its amenities ? This area could be a mix of residential builds selling plots off individually.
6. The development of the Dairies site would promote and augment the current regeneration of the town that the council are currently looking at.

*Council's Initial Response*

**Support Welcomed**

*Action*

**No change to the Plan**

*Representation(s)*

**3191 Mr Rod Davies [2881]**

**Support**

*Summary:*

Objection to the future planning on the field Ael y Bryn, Spring Gardens, the use of this green field at the top of Whitland for building when there are brown field sites in Whitland itself seems to be going backwards, that old factory site has been empty for 20 years and it is a eyesore in the town, it should be used before any other site in the town. Also there are other sites closer to the town for building that would be a lot better suited than a field right out on the outskirts of the town.

**3229 Mr Richard Lewis [4887]**

**Support**

*Summary:*

Support exclusion of site SR/163/005 from the revised LDP.

*Council's Initial Response*

**Support Welcomed**

*Action*

**No change to the Plan**



*Representation(s)*

**3261 Mr Gareth Phillips [3854]**

**Support**

*Summary:*

We refer to the County council's planning proposals for extending local development under reference SR/163/005, sub reference CA0302 and in particular to the proposed planning in the field to the rear of our property at Ael y Bryn, Spring Gardens, Whitland.

We formally object to the proposal to include this field within the proposed development plan for the following reasons

*Council's Initial Response*

**The site is located outside the development limits. Therefore support is welcomed**

*Action*

**No change to the Plan**





*Representation(s)*

**3477 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]**

**Support**

*Summary:*

DCWW provide an analysis of the allocations within an appendix and there are no objections. DCWW have confirmed that this analysis can be logged and responded to within the LDP Infrastructure Assessment/Study. DCWW ask that the general comments that they have included at the introduction of the appendix be transferred over in addition

*Council's Initial Response*

**Comments noted.**

**The Infrastructure Assessment will be prepared / updated by the Council.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3583 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Support**

*Summary:*

NRW provide an analysis of the allocations and there are no objections, other than 4 sites (see reps 3584,3586,3678,3679) . NRW have confirmed that this analysis can be logged and responded to within the LDP Infrastructure Assessment with regards to all housing allocation comments they made, other than these 4 specific objection sites (see reps 3584,3586,3678,3679).

*Council's Initial Response*

**Comments noted.**

**The Infrastructure Assessment will be prepared / updated by the Council.**

**Reference should be made to the Council's responses to representation reference numbers 3584 (prc3/h4) ,3586 (sec7/h3),3678 (prc2/h10) and 3679 (prc3/h30) - these can be viewed under the responses to representations received under policy HOM1 - housing allocations.**

*Action*

**No change to the Plan as a result of this representation.**

*Representation(s)*

**3481 Mrs Margaret Teal [4952]**

**Support**

*Summary:*

Having attended the consultation session at St Clears, I was made aware that site SR/126/006 for residential use has not been moved forward to the LDP for various reasons. I thank you for that decision.

*Council's Initial Response*

**Support Welcomed**

*Action*

**No change to the Plan**

*Representation(s)*

**3092 Mr D W Taylor [4823]**

**Support**

*Summary:*

Proposals for housing development would be unsound. A number of concerns are cited - most notably in relation to access/traffic issues and parking. Therefore, Policy HOM1 is supported due to the fact that candidate site SR/067/012 is not allocated for housing in the deposit Plan.

**3091 Mr D W Taylor [4823]**

**Support**

*Summary:*

Proposals for housing development would be unsound. A number of concerns are cited - most notably in relation to access/traffic issues and parking. Therefore, Policy HOM1 is supported due to the fact that candidate site SR/067/002 is not allocated for housing in the deposit Plan.

**3093 Mr D W Taylor [4823]**

**Support**

*Summary:*

Proposals for housing development would be unsound. A number of concerns are cited - most notably in relation to access/traffic issues and parking. Therefore, Policy HOM1 is supported due to the fact that candidate site SR/067/015 is not allocated for housing in the deposit Plan.

*Council's Initial Response*

**Support is welcomed**

*Action*

**No action to be taken**

**Representation(s)****4569 Mrs Sharon Meek [4220]****Support****Summary:**

I am writing in regards to the proposed development which are to the back and side of my property, I am extremely concerned as to the effect of these developments on the traffic and damage to the roads. The single track road behind our property is at present only to supply the farm and the few houses of the Dell. If this road is to be used for access to new developments then there is a good possibility that there will be structural damage, caused to the road running behind our house and that of Rock House due to the degrading etc to the road caused by heavy plant machinery and excess traffic. The single track road has less than a meter of land before it drops 30ft off the quarry wall, to the ground on which the two houses sit. In bad weather this bit of land has already started to move, dropping debris down onto the properties. It will also effect the entrance to our drive which is situated on the blind bend leading down from the Dell. Where is the proposed site entrance to be? This is a very large proposal site of agricultural land, when just up the road there has sat a development of houses left to go to ruin. I hope my concerns are heard. This is a support for the site's non inclusion under policy HOM1 as a housing allocation in the deposit Plan. Site reference is AS/086/032.

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**4570 Mrs Sharon Meek [4220]****Support****Summary:**

I am writing in regards to the proposed development which are to the back and side of my property, I am extremely concerned as to the effect of these developments on the traffic and damage to the roads. The single track road behind our property is at present only to supply the farm and the few houses of the Dell. If this road is to be used for access to new developments then there is a good possibility that there will be structural damage, caused to the road running behind our house and that of Rock House due to the degrading etc to the road caused by heavy plant machinery and excess traffic. The single track road has less than a meter of land before it drops 30ft off the quarry wall, to the ground on which the two houses sit. In bad weather this bit of land has already started to move, dropping debris down onto the properties. It will also effect the entrance to our drive which is situated on the blind bend leading down from the Dell. Where is the proposed site entrance to be? This is a very large proposal site of agricultural land, when just up the road there has sat a development of houses left to go to ruin. I hope my concerns are heard. This is a support for the site's non inclusion under policy HOM1 as a housing allocation in the deposit Plan. Site reference is AS/086/036.

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4568 Mrs Sharon Meek [4220]

Support

*Summary:*

I am writing in regards to the proposed development which are to the back and side of my property, I am extremely concerned as to the effect of these developments on the traffic and damage to the roads. The single track road behind our property is at present only to supply the farm and the few houses of the Dell. If this road is to be used for access to new developments then there is a good possibility that there will be structural damage, caused to the road running behind our house and that of Rock House due to the degrading etc to the road caused by heavy plant machinery and excess traffic. The single track road has less than a meter of land before it drops 30ft off the quarry wall, to the ground on which the two houses sit. In bad weather this bit of land has already started to move, dropping debris down onto the properties. It will also effect the entrance to our drive which is situated on the blind bend leading down from the Dell. Where is the proposed site entrance to be? This is a very large proposal site of agricultural land, when just up the road there has sat a development of houses left to go to ruin. I hope my concerns are heard. This is a support for the site's non inclusion under policy HOM1 as a housing allocation in the deposit Plan. Site reference is AS/086/035.

*Council's Initial Response*

**Support welcomed/comments noted.**

*Action*

**No change to the Plan.**

*Representation(s)*

4551 Mr Chris Carrott [2997]

Support

*Summary:*

It is a poorly thought out position as the road into it from Garreglwyd cannot handle increased traffic. This supports the non allocation of the site under Policy HOM1 - site ref AS/016/017.

*Council's Initial Response*

**Support welcomed/comments noted.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3104 Mr S Cooper [4829]**

**Support**

*Summary:*

The following Submissions have been made to the Local Authority to amend the Development Plan for exclusion and should be rejected: SR/067/012 - CA0697

**3103 Mr S Cooper [4829]**

**Support**

*Summary:*

The following Submissions have been made to the Local Authority to amend the Development Plan for eclusion and should be rejected: SR/067/002 - CA0340

*Council's Initial Response*

**Support welcomed**

*Action*

**No action to be undertaken**

*Representation(s)*

**3113 Mr Dennis Alexander [3310]**

**Support**

*Summary:*

Land between Heol Hafod Road & Heol Brown (previously promoted for safeguarding from development under candidate site SR/159/005) should be entirely outside the development area and should remain as recreation land. Therefore, Policy HOM1 is supported due to the fact that this land is not allocated for housing in the deposit Plan.

*Council's Initial Response*

**Support welcomed**

*Action*

**No action to be taken**

*Representation(s)*

**3178 Mr Emyr John [4549] Support**

*Summary:*

SR/004/041 Land at Myddynfych Farm, Bonllwyn.

Support that the above site has not been included.

**3177 Mr Emyr John [4549] Support**

*Summary:*

SR/004/003 En.0851 Dol y Derwen, Myddynfych

Support that the above site has not been included.

**3179 Mr Emyr John [4549] Support**

*Summary:*

SR/004/001 Enclosure 0608 Myddynfych Farm

Support that the above site has not been included.

*Council's Initial Response*

**Support welcomed**

*Action*

**No action to be taken**

*Representation(s)*

**3243 Mr J A C Davies [4892] Support**

*Summary:*

Proposals for housing development are objected to. A number of concerns are cited - most notably in relation to access/traffic issues - with reference made to the increased popularity of Llyn Llech Owain, the proposed new school and the industrial estate. Therefore, Policy HOM1 is supported due to the fact that candidate site SR/067/012 is not allocated for housing in the deposit Plan.

**3244 Mr J A C Davies [4892] Support**

*Summary:*

Proposals for housing development are objected to. A number of concerns are cited - most notably in relation to access/traffic issues - with reference made to the increased popularity of Llyn Llech Owain, the proposed new school and the industrial estate. Therefore, Policy HOM1 is supported due to the fact that candidate site SR/067/015 is not allocated for housing in the deposit Plan.

*Council's Initial Response*

**Support welcomed**

*Action*

**No action to be taken**

*Representation(s)*

**3250 Mr & Mrs R Geddes [4897] Support**

*Summary:*

Concerns raised in regards publicising the proposals. There may be demand for new houses - but the infrastructure is not here - inc water treatment/supply and amenities. Various issues with traffic and access (eg safety and amenity). School was extended but already full and there is a deficiency of play opportunities. There is a right of way and ecology interest. Concerns on ground conditions and history of the site following its handover to community. Plentiful supply of housing - including empty homes. Therefore, Policy HOM1 is supported due to the fact that candidate site SR/159/007 is not allocated for housing in the

**3249 Mr & Mrs R Geddes [4897] Support**

*Summary:*

Concerns raised in regards publicising the proposals. There may be demand for new houses - but the infrastructure is not here - inc water treatment/supply and amenities. Various issues with traffic and access (eg safety and amenity). School was extended but already full and there is a deficiency of play opportunities. There is a right of way and ecology interest. Concerns on ground conditions and history of the site following its handover to community. Plentiful supply of housing - including empty homes. Therefore, Policy HOM1 is supported due to the fact that candidate site SR/159/005 (which sought protection from development) is not allocated for housing in the deposit Plan.

**3251 Mr & Mrs R Geddes [4897] Support**

*Summary:*

Concerns raised in regards publicising the proposals. There may be demand for new houses - but the infrastructure is not here - inc water treatment/supply and amenities. Various issues with traffic and access (eg safety and amenity). School was extended but already full and there is a deficiency of play opportunities. There is a right of way and ecology interest. Concerns on ground conditions and history of the site following its handover to community. Plentiful supply of housing - including empty homes. Therefore, Policy HOM1 is supported due to the fact that candidate site SR/159/015 (which sought protection from development) is not allocated for housing in the deposit Plan.

**3248 Mr & Mrs R Geddes [4897] Support**

*Summary:*

Concerns raised in regards publicising the proposals. There may be demand for new houses - but the infrastructure is not here - inc water treatment/supply and amenities. Various issues with traffic and access (eg safety and amenity). School was extended but already full and there is a deficiency of play opportunities. There is a right of way and ecology interest. Concerns on ground conditions and history of the site following its handover to community. Plentiful supply of housing - including empty homes. Therefore, Policy HOM1 is supported due to the fact that candidate site SR/159/014 (which sought protection from development) is not allocated for housing in the deposit Plan.

*Council's Initial Response*

**Support welcomed**

*Action*

**No action to be taken**

*Representation(s)*

**3780 Cllr. A & D Vaughan Owen & Price [5057] Support**

*Summary:*

Support for the proposed level of housing allocation in Gorslas and Drefach under Policy HOM1.

In terms of housing allocation within the Gorslas ward, we welcome the fact that a number of the candidate sites have not been taken forward and included in the Deposit Plan - particularly in the village of Drefach and the area of Church Road, Gorslas, following concerns expressed to us around over-development.

*Council's Initial Response*

**Support welcomed**

*Action*

**No action to e taken**

*Representation(s)*

**3212 Mr Christopher Williams [3938] Support**

*Summary:*

I would like to support the removal of development SR/117/001 as these additional dwellings would increase the traffic using the junction between the A40 and the B4310.

**3223 Mr Christopher Williams [3938] Support**

*Summary:*

I would like to support the removal of development SR/117/002

**3224 Mr Christopher Williams [3938] Support**

*Summary:*

I would like to support the removal of development SR/117/006

**3211 Mr Christopher Williams [3938] Support**

*Summary:*

I would like to support the removal of development SR/117/003 from the Local Development Plans

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**



**Representation(s)**

**3309 Mrs Mandy Rogers [3206]**

**Support**

**Summary:**

I just wanted to state my gratitude that the previously candidate site submission ref.SR/080/008 at Maerdy Road SA19 6PN has not been included. I appealed when the proposed candidate sites were put forward last year and I stand with my reasons for appeal at that time, therefore I am grateful to see this proposed area has not been included in the Local Development Plan.

**Council's Initial Response**

**Support welcomed.**

**Action**

**No change to the Plan.**

**Representation(s)**

**4465 Mr & Ms N & L Beckett & Williams [5253]**

**Support**

**Summary:**

We are residents of Gorslas ward and we have received a flyer through our door asking us to get in touch with you to support an application for the old breakers yard (SR/067/004) to be included in the LDP. We would like to comment that we would not support the inclusion of the site in the LDP until such time as NRW are willing to accept the surrender of the current permit and Carmarthenshire County Council are satisfied that biodiversity concerns have been addressed.

**4495 Lisa Orwig [5260]**

**Support**

**Summary:**

The deposit revised Carmarthenshire local development plan 2018-2033 proposals map shows PrC3/h18 as the only residential allocation within the development limits in Gorslas. The written statement for views and comments shows PrC3/h18, land adj. Brynlluan (opposite the breakers yard), as the only site in Gorslas, for 29 units within the 11-15 year delivery timescale.

Flyer tries to stir up previous opposition to the scrapyard: 'at the end of the current lease period (dec. 2021) the scrapyard will return to full usage.....with no planning conditions restricting hours of operation, height of scrap storage, numbers of vehicles,etc'

However, remedial works would be required to bring up to operational standards due to the fire there at end July 2020.

The whole candidate site SR/067/004, cannot just be added in automatically to the LDP as a result of the influence of the last minute flyer. Number of vehicles would increase with even more housing anyway.

A lot of lorries use this road as a thoroughfare now. Lots of locals and tourists visit Cwmcerrig farm shop as its a restaurant and a shop in an agricultural setting.

Gorslas should keep its own identity rather than being added to the Cefneithin conurbation

**Council's Initial Response**

**Support Welcomed**

**Action**

**No change to Plan**

*Representation(s)*

**3112 Mr Dennis Alexander [3310]**

**Support**

*Summary:*

Land between Heol Hafod Road & Heol Brown (previously promoted for safeguarding from development under candidate site SR/159/014) should be entirely outside the development area and should remain as recreation land. Therefore, Policy HOM1 is supported due to the fact that this land is not allocated for housing in the deposit Plan.

*Council's Initial Response*

**Support welcomed**

*Action*

**No change to plan**

*Representation(s)*

**4085 Mr Owen Williams [3158]**

**Support**

*Summary:*

Support for the site's exclusion (SR/147/001).

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4574 Mr & Mrs P & S Newman [5213]**

**Support**

*Summary:*

Support for Policy HOM1.

Support for the exclusion of candidate site (SR/064/001) from the Revised Deposit LDP.

The site is located on a bad bend and very poor access, with no drainage or sewage facilities and even with this Lock-down our road still carries a lot of traffic. We've seen many a car or trailer end up in a ditch because of this.

Plus the water; over the last forty years there have been several buildings converted to dwellings & also the property at the very top of the road, Trumyrhwch has been put on the water main causing all sorts of problems with the water pressure low for them & high for us and others. Last time the water board came out ours was 11 bars they said they've fixed it like they did last time and before that.

**4573 Mr & Mrs P & S Newman [5213]**

**Support**

*Summary:*

Support for Policy HOM1.

Support for the exclusion of candidate site (SR/064/013) from the Revised Deposit LDP.

The site is located on a bad bend and very poor access, with no drainage or sewage facilities and even with this Lock-down our road still carries a lot of traffic. We've seen many a car or trailer end up in a ditch because of this.

Plus the water; over the last forty years there have been several buildings converted to dwellings & also the property at the very top of the road, Trumyrhwch has been put on the water main causing all sorts of problems with the water pressure low for them & high for us and others. Last time the water board came out ours was 11 bars they said they've fixed it like they did last time and before that.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4077 Mr & Mrs Barney & Pat Gill [4820]**

**Support**

*Summary:*

This is the site of a former toxic waste tip and is totally unsuitable for any development. This landfill site received waste from the Borough of Llanelli from 31st December 1959 to 31st December 1975. According to the Environment Agency site details (May 2012) all five types of waste have been buried in this landfill site over this period, including hazardous waste. (attachments/copies provided).The land was used to bury large amounts of asbestos. The Environment Agency took samples from the boundary ditch between this proposed development land and the adjacent land opposite Trem - y - Dderwen and stated that this land should be left undisturbed due to the toxic elements dumped at this former waste tip and bound up in the soil. They are of the opinion that provided the land was left intact the potential for serious pollution of the River Gwili would be minimised. Concerns are therefore focused upon the history / former uses on the site. This is a support for the non-inclusion of the candidate site SR/084/004 - site reference is AS/084/004 under policy HOM1.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

**Representation(s)****4466 Aled Davies [3266]****Support****Summary:**

Support is given to the decision to exclude land at Mounthill Farm, rear of Brynhyfryd and along the southern side of Roman Road as a large residential development site (site reference AS/021/038). A number of reasons in support of the representation are provided.

**4519 Mr Llew Thomas [3286]****Support****Summary:**

My purpose in writing is to thank the County Council for listening to the views of the community and indeed the Community Council and removing the proposed large scale development from the revised plan (candidate site ref SR/021/038). It is much appreciated by locals who feared that the development would swamp the area and change the character and nature of the community. We are most grateful to the County Council for taking a stand and supporting the community over profit.

**4524 Tegwen Thomas [4325]****Support****Summary:**

There have been a number of developments in the area but, from discussions with the Community Council, the view amongst locals is that the Roman Road forms what would be considered a natural boundary for developments in the area and they would not wish for future developments on that side of the Roman Road (Candidate site reference SR/021/038). Thank you for respecting that view of where a boundary should be drawn to define and retain the unique character of the Llangunnor community.

**4467 Carys Davies [3353]****Support****Summary:**

Support is given to the decision to exclude land at Mounthill Farm, rear of Brynhyfryd and along the southern side of Roman Road as a large residential development site (site reference AS/021/038). A number of reasons in support of the representation are provided.

**Council's Initial Response**

**Support for the exclusion of the site is welcomed.**

**Action**

**No change to the Plan.**



*Representation(s)*

**3994 Mrs Lynn C C C Bushin [4817]**

**Support**

*Summary:*

This part of the objection relates to the part of the Candidate Site (SR/124/001) that falls outside of the allocation SeC14/h4.

I wish to object to this site being included in the Deposit LDP.

This site is incorrectly named & identified - There are three areas in close proximity that are called "Glanawmor" in the village of Pencader. The proposed site currently makes up part of the holding of Glanawmor Uchaf Farm and should be identified as such.

The plan supplied by the applicants to identify this site shows two fields and does not show the full extent of the land and buildings owned by the applicants, and by its omission is erroneous and misleading. The full extent of the land in ownership of the applicant and its current use should be taken in account when making this decision to include a site in the LDP.

*Council's Initial Response*

**Support for the exclusion of the Candidate Site is welcomed.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4455 Mr Wyn Davies [3276]**

**Support**

*Summary:*

Support is given to the Deposit Plan and agreement with the decision to exclude the land at Mounthill Farm, rear of Brynhyfryd and along the southern side of Roman Road as a large residential development site (Site Reference SR/021/038. Detailed reasons are provided as part of the representation.

*Council's Initial Response*

**Support for the exclusion of the site is welcomed.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4417 Llanedi Community Council (Mr J L Griffiths) [2922] Support**

*Summary:*

SR/159/014 support to the exclusion

**4416 Llanedi Community Council (Mr J L Griffiths) [2922] Support**

*Summary:*

The respondent supports the exclusion of candidate site SR/159/005.

**4418 Llanedi Community Council (Mr J L Griffiths) [2922] Support**

*Summary:*

SR/159/015 support to the exclusion

*Council's Initial Response*

**Noted. The site is excluded from the Revised LDP.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3193 Mr Wyn Humphreys [4580] Support**

*Summary:*

I wish to support the exclusion of site SR/162/002, Land adjacent to Maesawelon, Whitemill from the housing allocations list.

The proposed siting of the development is particularly ill-considered

The development represents an outward extension of built development into open countryside resulting in a visual intrusion into the countryside and a coalescence of settlements to the detriment of the appearance and character of the area.

The development doesn't fit in with the character of the village form and landscape, and it cannot be classified as a logical extension or rounding of the development due to location and nature of its surroundings

*Council's Initial Response*

**Support for the exclusion of the site is welcomed.**

*Action*

**No change to the Plan.**

**Paragraph HOM1: Housing Allocations, PrC1/h1**

*Representation(s)*

**4145 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4278 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275

*Council's Initial Response*

**The site has planning permission for residential development. The principle of development on this site has been established.**

*Action*



## Paragraph HOM1: Housing Allocations, PrC1/h2

### Representation(s)

**4031 Mr and Mrs Robert and Gaynor Hathway [5129]**

**Object**

#### *Summary:*

Opposition to further housing development off Springfield road and Cwmoernant - this is based on the the following facts 1. Traffic along Wellfield road is already chaotic - for most part of the road there is insufficient width for two cars to pass each other which results in cars driving up onto the narrow pavements. 2. Springfield road itself is quite narrow and has a choke point about 2/3rds of the way up. Adding more housing with say 2 cars per household would significantly increase the traffic problems which already exist 3. The area to be included in the development plan adjacent to these areas support a large array of wildlife.

With the enormous housing development going on the west of the town already why is it necessary to destroy these oases of wildlife so close to the town centre.

**4088 Mr & Mrs C Jones [5138]**

**Object**

**Agent: Crompton Land & Development Ltd (Mr Andrew Crompton) [3047]**

#### *Summary:*

Objects to the inclusion of site PrC1/h2 under policy HOM1. It is an extremely difficult site to develop due to the extreme topographical level changes across the site that will require significant earthworks and retaining walls - as illustrated by the indicative cross sections included within the application drawings.

**3294 Mr Chris Still [4907]**

**Object**

#### *Summary:*

We object to further parcels of land in the Springfield and Cwmoernant area being developed upon for the following reasons...

- it is a Conservation area
- it will drive the wildlife away (rabbits, birds, foxes, hedgehogs, bats, lizards, and birds of prey)
- the roads are unsafe currently as they are narrow and a further increase in traffic will worsen the problem up Springfield Road where there are no pavements and a substantial number of pedestrian traffic including school children
- it will increase air and noise pollution

**4154 Persimmon Homes West Wales (Stuart Phillips) [5154]**

**Object**

#### **Agent:**

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

#### *Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**3391 Mr & Mrs S & L John [4960]****Object****Summary:**

Objection to housing allocation PrC1/h2 in Carmarthen:

My comments relate to the impact on the local roads which impact me in Heol Y Delyn. I assume that with the proposed development will come 50-60 cars belonging to the residents. There will be addition traffic from deliveries etc.

What impact on Wellfield Road and Long Acre Road will there be from this additional traffic?

Will the local roads cope with the extra traffic, particularly at certain times of the day eg school, shop opening times? Are traffic lights envisaged ?

**3422 Ms Sally Bere [3602]****Object****Summary:**

Objection to allocation PrC1/h2

The site should be the subject of further analysis of physical & nature conservation constraints.

This site has been "in play " in the planning system for 30 years, yet it remains undeveloped.

It is difficult to see how the 29 units can be achieved because of the slope of the land.

This junction of Capel Evan Road is the only route out for over 500 dwellings.

Nature conservation and biodiversity constraints of the site were not assessed.

The public right of way which crosses the site is part of the strategic rights of way network.

**4282 Persimmon Homes West Wales (Stuart Phillips) [5154]****Object****Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**3712 Mr Derek Edwards [4951]****Object****Summary:**

We object to further development (site PrC1/h2) for the following reasons:

- The approach road is hazardous;
- The area is dangerous to pedestrians as there are no pavements;
- The junction at the bottom of Springfield Hill and Wellfield Road often has parked cars;
- Extra traffic will add to these hazards.

**3771 Mr Ceredig Emanuel [4942]**

**Object**

*Summary:*

This is an objection to the inclusion of the housing allocation PrC1/h2 for the following reasons:

- Increased vehicular traffic to Springfield Road will exacerbate an already busy and narrow road which has no pavement for pedestrians.
- There is also considerable congestion at the junctions for Longacre Road (no footpaths), Capel Evan Road, and Park Hall Road as they approach Richmond Terrace. There is a similar problem at the junctions of Wellfield Road, Penlan Road and Brewery Road as they access Waterloo Terrace.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The site has the benefit of outline planning permission.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, PrC1/h4**

*Representation(s)*

**4280 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 11-15 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4150 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 11-15 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**3295 Mr Chris Still [4907] Object**

*Summary:*

We object to further parcels of land in the Springfield and Cwmoernant area being developed upon for the following reasons...

- it is a Conservation area
- it will drive the wildlife away (rabbits, birds, foxes, hedgehogs, bats, lizards, and birds of prey)
- the roads are unsafe currently as they are narrow and a further increase in traffic will worsen the problem up Springfield Road where there are no pavements and a substantial number of pedestrian traffic including school children
- it will increase air and noise pollution

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3974 Dolawen Cyf (Owain Jones) [3841] Support**

**Agent: Asbri Planning Ltd (Mr Keith Warren) [592]**

*Summary:*

representation which is supporting housing allocation PrC1/h4 and policy HOM1.

Further to the candidate site submission in 2018, the identification of the site as a residential development allocation - PrC1/h4 is welcomed, The Deposit LDP is supported on the basis. As such, in relation to this site the overall soundness of the Plan is also accepted. The aim is to work with the Council in progressing detailed proposals for the site which will be informed by information, particularly relating to site capacity and the scale of the house types proposed, This will be provided at future stages of the LDP Review process in the lead up to the Examination. Further evidence is provided in the submission to demonstrate that the site is deliverable and in a future development provisions would be incorporated which would seek to ensure a high quality of design and layout, and which would also address site issues including access considerations.

*Council's Initial Response*

**Support is welcomed.**

*Action*

**No change to the Plan.**

**Paragraph HOM1: Housing Allocations, PrC1/h10**

*Representation(s)*

**3920 Mr P Morris [3844] Support**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

The inclusion of part of the field within the deposit draft development limits for Llangynnwr is supported.

*Council's Initial Response*

**Support is welcomed.**

*Action*

**No change to the Plan.**

**Paragraph HOM1: Housing Allocations, PrC1/h11**

*Representation(s)*

**4281 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4151 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**The site has planning permission and is currently under construction for 12 dwellings.  
The principle of development on this site has been established.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, PrC1/h12**

*Representation(s)*

**3906 \_\_ Mcdermott, Howell, Evans [5089]**

**Support**

***Agent: Evans Banks Planning Limited (Richard Banks) [4967]***

***Summary:***

Our clients wholeheartedly welcome the decision of the Authority to concur with the representation previously made in relation to our Clients land and fully support their decision to include the land as a Residential Allocation within the development limits. They intend enacting upon this inclusion shortly after the LDP is formally adopted, by means of a formal planning application, and thereafter commence implementation of the development of the site within the early years of the Plan Period.

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***Council's Initial Response***

**Support is welcomed.**

***Action***

**No change to the Plan.**

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**Paragraph HOM1: Housing Allocations, PrC1/h13**

*Representation(s)*

**4149 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-15 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4279 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-15 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to, and in a manner consistent with the Sustainability Appraisal. The allocation, along with the others within Carmarthen, makes sufficient provision for the housing needs of this settlement. The site has the benefit of outline planning permission and is currently for sale.**

*Action*

**No change to the Plan.**



## Paragraph HOM1: Housing Allocations, PrC1/MU1

### Representation(s)

**3872 Evans Banks Planning Limited (Richard Banks) [4967] Object**

**Summary:**

An objection is raised about the delivery of the West Carmarthen housing site (PrC1/MU1). Numbers in support of the current, and past delivery rate illustrate that the level of development anticipated will not be achieved.

**3607 Mr O Evans [3966] Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

**Summary:**

Objection to the allocation of Carmarthen West (PrC1/MU1), and seeking a reduction in allocation size under policy HOM1.

Only 10% (114 units out of 1100 units) of the Strategic Site PrC/MU1 have been completed in the LDP period, and by the Council's own calculations (reproduced in the JHLAS) only a further 115 units are optimistically predicted to be completed by late 2021, resulting in an overall total of 229 units out of a predicted 1100 units (21%).

Clearly, there is no historic demand for a site of this scale in this part of Carmarthen.

**3901 Jones, Douch, T.A.C Morgan, Bromley Davenport, Boggis-Rolfe [5085] Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

**Summary:**

Concern is raised about the delivery of the West Carmarthen housing site (PrC1/MU1). Numbers in support of the current, and past delivery rate illustrate that the level of development anticipated will not be achieved.

**3611 Mr N Davies [4032] Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

**Summary:**

We submit that the site PrC1/MU1 West Carmarthen be omitted from the Plan, and that housing allocation be redistributed to modest Candidate Sites, of up to 90 units such as that proposed at Dolgwili. There is clear evidence in the Bronwydd Road area of Carmarthen, such as the completion of the "Coed-y-Neuadd" and "Pantglas" developments, that such modest sites are far more likely to be brought forward and developed in full by regional and small housebuilders given that construction and development costs are more likely to be viable.

**3614 Mr & Mrs J T J Davies [4132] Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

**Summary:**

We submit that the draft allocation at West Carmarthen (PrC1/MU1) be omitted from the Plan, and that the site's housing allocation be redistributed to modest Candidate Sites, of up to 10-25 units such as that proposed at Parc-y-Ffynnon. There is clear evidence in Ferryside, such as the completion of the Parc-y-Ffynnon development, that such modest sites are far more likely to be brought forward and developed in full by regional and small housebuilders given that construction and development costs are more likely to be viable in relation to house sales and the general housing market in this part of Carmarthenshire.

3838 Mr C Stack [3950]

Object

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

**Summary:**

Concern is raised about the delivery of the West Carmarthen housing site (PrC1/MU1). Numbers in support of the current, and past delivery rate illustrate that the level of development anticipated will not be achieved.

**Council's Initial Response**

It is considered that the continued allocation of the West Carmarthen Strategic site remains as a strategic site in the LDP. A Development Brief has been adopted on the site in order to ensure a comprehensive and integrated development is undertaken on the site. Since the adoption of the Brief in 2010, the link road has been completed and houses have been completed on the southern side of the site. The Council along with partners, landowners and housebuilders have invested time and resources into delivering this site over recent years. Planning applications are now coming forward for the site and it is considered that the site remains to be appropriate and deliverable for the mixed uses described within the Planning and Development Brief.

**Action**

No change to the Plan.



*Representation(s)*

**3238 E & O & E Jones & Elias [5052] Support**

**Agent: RPS Planning & Development (Mrs Kate Gapper) [797]**

*Summary:*

In order to meet the requirement of 8,835 homes, provision is made for 10,160 homes in accordance with the identified settlement framework. This includes allocating sites for new homes in established settlements. Policy HOM1 allocates land at West Carmarthen (Site Ref: PrC1/MU1) for the development of 700 new homes within the plan period and makes provision for a total of 84 units (12%) to be affordable units. Policy HOM1 identifies this allocation coming forward within years 6-10 and 11-15 of the plan period i.e. 2024 onwards. We agree and support this housing allocation for West Carmarthen.

**3841 Mr James Bromhead [5053] Support**

**Agent: RPS Planning & Development (Mrs Kate Gapper) [797]**

*Summary:*

In order to meet the requirement of 8,835 homes, provision is made for 10,160 homes in accordance with the identified settlement framework. This includes allocating sites for new homes in established settlements. Policy HOM1 allocates land at West Carmarthen (Site Ref: PrC1/MU1) for the development of 700 new homes within the plan period and makes provision for a total of 84 units (12%) to be affordable units. Policy HOM1 identifies this allocation coming forward within years 6-10 and 11-15 of the plan period i.e. 2024 onwards. We agree and support this housing allocation for West Carmarthen.

**3190 RPS Planning & Development (Mrs Kate Gapper) [797] Support**

*Summary:*

In order to meet the requirement of 8,835 homes, provision is made for 10,160 homes in accordance with the identified settlement framework. This includes allocating sites for new homes in established settlements. Policy HOM1 allocates land at West Carmarthen (Site Ref: PrC1/MU1) for the development of 700 new homes within the plan period and makes provision for a total of 84 units (12%) to be affordable units. Policy HOM1 identifies this allocation coming forward within years 6-10 and 11-15 of the plan period i.e. 2024 onwards.

We agree and support this housing allocation for West Carmarthen.

*Council's Initial Response*

**Support is welcomed**

*Action*

**No change to the Plan.**



## Paragraph HOM1: Housing Allocations, PrC1/MU2

### Representation(s)

- 3839 Mr C Stack [3950]** **Object**  
**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**  
**Summary:**  
 The allocation of the Pibwrlwyd allocation (Site PrC1/MU2) is questioned. The current adopted SPG for the site states that "residential use on this site is not considered appropriate". No explanation has been provided to warrant a departure from the adopted SPG. New housing at this location would be alien in form to the long-established business and education uses at Pibwrlwyd.
- 
- 3612 Mr N Davies [4032]** **Object**  
**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**  
**Summary:**  
 We submit that the site PrC1/MU2 Parc Pibwrlwyd be omitted from the Plan, and that housing allocation be redistributed to modest Candidate Sites, of up to 90 units such as that proposed at Dolgwili. There is clear evidence in the Bronwydd Road area of Carmarthen, such as the completion of the "Coed-y-Neuadd" and "Pantglas" developments, that such modest sites are far more likely to be brought forward and developed in full by regional and small housebuilders given that construction and development costs are more likely to be viable.
- 
- 3615 Mr & Mrs J T J Davies [4132]** **Object**  
**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**  
**Summary:**  
 We submit that the draft allocation at Pibwrlwyd be omitted from the Plan, and that it's housing allocation be redistributed to modest Candidate Sites, of up to 10-25 units such as that proposed at Parc-y-Ffynnon. There is clear evidence in Ferryside, such as the completion of the Parc-y-Ffynnon development, that such modest sites are far more likely to be brought forward and developed in full by regional and small housebuilders given that construction and development costs are more likely to be viable in relation to house sales and the general housing market in this part of Carmarthenshire.
- 
- 3902 \_ \_ Jones, Douch, T.A.C Morgan, Bromley Davenport, Boggis-Rolfe [5085]** **Object**  
**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**  
**Summary:**  
 The allocation of the Pibwrlwyd allocation (Site PrC1/MU2) is questioned. The current adopted SPG for the site states that "residential use on this site is not considered appropriate". No explanation has been provided to warrant a departure from the adopted SPG. New housing at this location would be alien in form to the long-established business and education uses at Pibwrlwyd.
- 
- 3908 Evans Banks Planning Limited (Richard Banks) [4967]** **Object**  
**Summary:**  
 The allocation of the Pibwrlwyd allocation (Site PrC1/MU2) is questioned. The current adopted SPG for the site states that "residential use on this site is not considered appropriate". No explanation has been provided to warrant a departure from the adopted SPG. New housing at this location would be alien in form to the long-established business and education uses at Pibwrlwyd.

*Council's Initial Response*

The allocation of the site within the LDP for mixed use has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. Further evidential work will be undertaken prior to the examination in to the revised LDP

The proposed use for the site is for a mix of potential uses, including residential, education and commercial uses consisting of offices and light industrial. It is also considered that part of the site is appropriate for residential development in order to support the other uses, and to ensure the site's viability.

*Action*

No change to the Plan.



**Paragraph HOM1: Housing Allocations, SuV1/h1**

*Representation(s)*

**4288 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4161 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

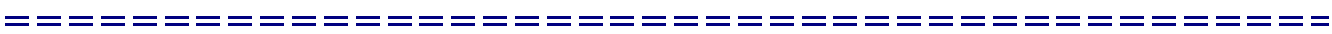
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to, and in a manner consistent with the Sustainability Appraisal. The allocation, along with the others within Cynwyl Elfed, makes sufficient provision for the housing needs of this settlement. The site has the benefit of outline planning permission on part, reserved matters on part and a number of plots are currently for sale.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, SuV1/h2**

*Representation(s)*

**4289 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

**Summary:**  
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4162 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

**Summary:**  
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to, and in a manner consistent with the Sustainability Appraisal. The allocation, along with the others within Cynwyl Elfed, makes sufficient provision for the housing needs of this settlement.**

*Action*

**No change to the Plan.**

**Paragraph HOM1: Housing Allocations, SuV3/h1**

*Representation(s)*

**4477 Mr Alun Cole [5182]**

**Object**

*Summary:*

No consideration has been given to the distinct possibility that the development of the site at Maes Griffith, might well not go ahead for lack of viability. If the development of this site for housing does not go ahead, then Llansteffan will have insufficient new housing ( including affordable housing ) to meet the requirements of the LDP.

The possibility that the site at Maes Griffith will prove to be unviable is very real. It is well documented that this site has been available for development for many years , but that due to the requirements imposed in respect of it for affordable housing, and other adverse factors relating to the site itself, to date it has not proved possible to bring forward a financially viable development - and hence the site has remained undeveloped. The current prospective developer is Cartrefi Croeso, and to the best of my knowledge the issue of viability remains alive and unresolved.

Another factor bearing upon the prospective availability of Maes Griffith site to provide housing , is the very immediate and pressing issue of parking on the main street through the village creating dangers for both pedestrians and vehicles. The pedestrian paving is very narrow. The dangers of personal injury and damage to vehicles is obvious and manifest.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

*Action*

**No change to the Plan**

**Paragraph HOM1: Housing Allocations, SuV5/h1**

*Representation(s)*

**3210 Mr Derrick Phillips [812]**

**Object**

*Summary:*

There are no plots left available within the allocation and the Council have got their figures in relation to the plots available in the plan period incorrect

*Council's Initial Response*

**The Council has undertaken background evidential work in line with previous Joint Housing Land Availability Studies. Whilst a number of plots have been developed on the site since the revised LDP base date, their numbers are included within the housing commitment section of the Housing trajectory set out in Appendix 7.**

*Action*

**No change to the Plan**



**Paragraph HOM1: Housing Allocations, SuV8/h1**

*Representation(s)*

**4163 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4290 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The site is currently under consideration at planning appeal. further evidence will be provided at examination into the viability and deliverability of the site within the the revised LDP**

*Action*

**No change to the Plan**



**Paragraph HOM1: Housing Allocations, SuV10/h1**

*Representation(s)*

**4291 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4164 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

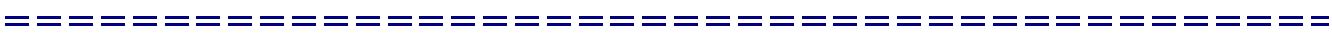
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to, and in a manner consistent with the Sustainability Appraisal. The allocation, along with the others within Peniel, makes sufficient provision for the housing needs of this settlement. The site has the benefit of outline planning permission on part, reserved matters on part and a number of plots are currently for sale.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, SuV10/h2**

*Representation(s)*

**4108 Pennant Homes (Dyfan Williams) [5143]**

**Support**

**Agent: Geraint John Planning Ltd (Mr Luke Grattarola) [685]**

*Summary:*

The site within our client's ownership has been allocated under site reference SuV10/h2 for residential development. We fully support this policy and allocation. A detailed case is provided in the full representation

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*Council's Initial Response*

**Support is welcomed.**

*Action*

**No change to the Plan.**

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**Paragraph HOM1: Housing Allocations, SuV12/h1**

*Representation(s)*

**4165 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4293 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to, and in a manner consistent with the Sustainability Appraisal. The allocation makes sufficient provision for the housing needs of Llanpumpsaint. Contact has been made with the landowner who has confirmed that the site is deliverable during the Plan period.**

*Action*

**No change to the Plan.**

**Paragraph HOM1: Housing Allocations, SuV14/h1**

*Representation(s)*

**3745 Mr & Mrs C J Griffin [623]**

**Object**

*Summary:*

This is an objection to candidate site SR/145/010. The supporting documentation by the agent for the candidate site contains a number of errors and a number of statements are also disputed.

The recent/current Cefn Farm site development promised only 9 houses would be built; consideration would be given to providing an area of amenity land for community use and every effort would be made to preserve existing hedgerows and increase them by new planting of boundary hedges between the new properties all of which proved to be untrue.

Rhydargaeau is a small village with no employment opportunities, retail services or public facilities. It has very limited public transport services thus forcing people to use private transport. The latest proposal, on top of the recent and current development within the village, represents in percentage terms a disproportionate development of the area and should therefore not be supported.

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*Council's Initial Response*

**The objector's comments are noted, however, it is considered that the site is an appropriate site for the future growth of Rhydargaeau, for which this is the only housing site identified in the village. The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3808 Moelfre Developments Ltd [498]**

**Support**

***Agent: Evans Banks Planning Limited (Richard Banks) [4967]***

***Summary:***

Supports the inclusion of site SuV14/h1 within the HOM1 allocations.

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*Council's Initial Response*

**Support is welcomed.**

*Action*

**No change to the Plan.**

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**Paragraph HOM1: Housing Allocations, SuV15/h1**

*Representation(s)*

**4166 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4292 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The site has planning permission and is under construction, with only a few units remaining at the time of writing. It is considered that there is sufficient evidence to prove the site is able to be delivered within the Plan period.**

*Action*

**No change to the Plan.**

## Paragraph HOM1: Housing Allocations, SuV16/h1

### Representation(s)

**4167 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4294 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4055 Evans Banks Planning Limited (Mr Jason Evans) [2988] Object**

**Summary:**

Allocated in current LDP and former UDP - the site has only delivered one unit in a 15 year lifespan and so has made no real contribution to meet the local level of housing need. What is of further concern is that the Authority continues to allocate the land - for 8 units - in a settlement with such a low level of community facilities and local services. The above is of significant concern, as it is clear that the level of housing allocation for Capel Dewi in comparison with - for example - Llanarthne when taking into consideration their respective sustainability level, is clearly disproportionate. This is against not only the guidance of national planning policy, but also against that of the Council's own LDP Preferred Strategy in terms of the distribution of growth. The site's allocation results in the Deposit LDP being unsound.



*Council's Initial Response*

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

Parts of the site have planning permissions (or applications being determined at the time of writing). It is considered that there is sufficient evidence to prove the site is able to be delivered within the Plan period.

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, SuV17/h1**

*Representation(s)*

**4168 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4295 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The landowner/developer has made active progress towards delivery of the site through a recent pre-application process for a housing scheme.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, SuV18/h1**

*Representation(s)*

**4296 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4169 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**The site has reserved matters planning permission for 15 dwelling houses. The principle of development on this site has been established.**

**The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. The allocation identified within the LDP makes sufficient provision for the housing needs of this settlement.**

*Action*



**Paragraph HOM1: Housing Allocations, SuV19/h1**

*Representation(s)*

**4297 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4170 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

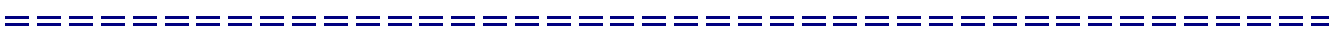
*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**The site has a pending Reserved Matters application awaiting determination. Further evidential work will be provided at the examination in to the revised LDP.**

*Action*

**No change to the Plan**



## Paragraph HOM1: Housing Allocations, SuV19/h2

### Representation(s)

**3219 Mr Shaun Burgess [3027]**

**Object**

*Summary:*

This proposal increases the village by 25% in an area with few supporting facilities and where planning has already been awarded for a further 15 dwellings. It's more appropriate in larger settlements close to areas of employment, shops, transport, GPs, a more preferable option than pepper potting growth areas within rural communities. The proposal will increase car journeys of new residents when accessing employment, shops, education.

Pepper potting rural communities goes against the sustainability agenda which the local authority should be supporting.

The school is currently at capacity and unable to accommodate increase and further development, compromising the children's safety.

**3743 Annette Gregory [382]**

**Object**

*Summary:*

I am objecting to any further development to the area already granted to SuV19/h2. The area is accessed beside Llanddarog School and the land adjacent to Haulfan.

Objections include impacts on the local school, traffic, habitat, over development of Llanddarog, impact on health and well being, unsustainable strain on infrastructure, loss of agricultural land

**3738 Mrs Sheila Mills [549]**

**Object**

*Summary:*

Any development will destroy the wonderful habitat across the field. Over the years my friends have visited from Germany, Finland and the Netherlands and all are so impressed by this small, quiet, unspoilt village. They were dismayed when new large houses were built, about 25% extra in my time. It would get noisier, traffic increased, no Sunday buses for non-drivers. Existing homes will lose value.

After the bungalows here were all occupied the sewers on the site couldn't cope and we had it flowing onto our garden. The infrastructure cannot take all this extra pressure.

**3227 Mr Allan Haskins [4884]**

**Object**

*Summary:*

Whilst I accept that there's a urgent need for new housing to be provided for an ever expanding population sporadic development as proposed for Llanddarog is in my opinion not the answer, the infrastructure simply would not support the number of houses that could be built on the proposed area, I believe it would be more cost effective to site new builds where the infrastructure already exists by expanding larger conurbations this would have the added benefit of not increasing traffic flow on an already overloaded road network. I believe this proposal should be removed from the LDP.

*Council's Initial Response*

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.

The site has not been subject to any objection from infrastructure or statutory consultees.

Further evidential work will be provided at the examination in to the revised LDP.

*Action*

No change to the Plan.



**Paragraph HOM1: Housing Allocations, SuV20/h1**

*Representation(s)*

**4068 Mr Dafydd Jones [3402]**

**Object**

*Summary:*

I register my opposition to this site SuV20 /h1 being included in the revised Local Development Plan. This site borders with one of our farm's fields and it is a site that was categorically refused in 2014. From my understanding of the situation, following a long period of consultations, tests and assessments, and a Public Hearing, it was unanimously decided that this particular field - now presented as SuV20/h1 - was not suitable for development. The Forward Planning Department presented a list of arguments recommending that the site be turned down for a number of Planning issues. Amongst those issues raised was the fact that it would result in unnecessary intrusion of development into the countryside as well as having a detrimental impact on the character and setting of the settlement. There were other various sound arguments that led to the decision not to allocate this field. At the Public Hearing the Independent Inspector agreed. What, then, has changed? If this field was refused for development in 2014 why is it under consideration for development now? The arguments against its development remain unchanged. I wish to attend the Public Hearing to have the opportunity to present evidence to the Independent Inspector

**3405 Gwyneth & Eddie Jones [4968]**

**Object**

*Summary:*

Objection to the inclusion of site SvV20/h1 for the following reasons:

1. This land is not a suitable site for development. Surface water flows down from surrounding area and drains in this field.
2. Another concern is the fact there will be need of an entrance to a proposed development site. If this entrance is to be located at the small junction there will be potential danger regarding poor visibility.
3. In the past numerous developments were refused based on the fact that they were considered as being out of character with the surrounding area.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. The allocation identified within the LDP make sufficient provision for part of the housing/employment needs of this settlement.**

*Action*

**No change to the Plan**



**Representation(s)****3824 Mudiad Amddiffyn Porthyrhyd [4349]****Object****Summary:**

Estyniad di-alw amdano a digyfiawnhad o ardal fechan ynysig yng nghefn gwlad fyddai datblygiad o'r fath - a hynny ar safle a ddyfarnwyd yn anaddas yn 2014.

O ystyried y safle dan sylw (SuV20/h1) nid yw'r ffaith bod modd cael mynediad arall yn datrys yr holl broblemau dwys eraill.

Nid yw'r ffaith bod y safle'n llai o faint yn gwneud unrhyw wahaniaeth gwirioneddol 'chwaith na'r ffaith mai chwech o breswylfeydd yw'r nifer a glustnodir bellach ar gyfer y safle. Yn 2014, pan ystyriwyd pob safle amgen posib gan gynnwys y safle hwn, deuthpwyd i gonsensws barn nad oedd safle addas i ddatblygu arno ym Mhorth-y-rhyd. Does dim wedi newid.

This is an unwarranted and unjustified extension of an isolated urban area in the countryside - a development proposed on land that was refused and deemed not suitable for development in 2014.

With regards to the site in question (SuV20/h1) a different entrance does not erase all the other serious issues. Neither is the fact that the proposed site has now been reduced in size with six dwellings having been identified as indicative for the site. The fact remains. This site is not suitable for development.

When all possible alternative sites in the village (including this site) were under scrutiny back in 2014 with the aim of allocating a site for development, a consensus was reached that there were NO suitable sites for development in Porth-y-rhyd. Nothing has changed.

**3398 Mrs Lynwen Jones [3394]****Object****Summary:**

Fel cyd berchennog fferm Llwynhenri, Porthyrhyd, rwy'n gwrthwynebu cynnwys safle SuV20/h1 yn y fersiwn diwygiedig o'r Cynllun Datblygu Lleol.

As co-owner of Llwynhenri Farm, Porthyrhyd, I register my opposition to the inclusion of SuV20/h1 in the revised Local Development Plan



**3827 Mr Brian Evans [2973]****Object****Summary:**

1. Mae'r cae hwn wedi cael ei wrthod ar gyfer ei ddatblygu yn y gorffennol gan Arolygydd Annibynnol a hynny gydag argymhelliad Adran Blaen-Gynllinio Cyngor Sir Caerfyrddin. Er iddo gael ei wrthod am nifer o resymau Cynllunio cadarn gan wahanol garfannau mae'n debyg ei fod yn cael ei ystyried unwaith eto ar gyfer ei ddatblygu.

2. Pan ystyriwch ddaearyddiaeth a daeareg Porth-y-rhyd nid yw'n syndod nad oes safleoedd addas ar gyfer datblygu yn y pentref. Mae'r pentref i gyd ar lawr dyffryn y Gwendraeth Fach ac o fewn parthau llifogydd.

3. Ni fyddai adeiladu ar y safle hwn yn ddatblygiad naturiol o ran Materion Cynllunio a dylai 'r safle gael ei wrthod y tro hwn eto.

1. This particular field was turned down as an allocation site by an Independent Inspector in 2014 on the recommendation of the Forward Planning Department of the Carmarthenshire County Council. Despite the fact that it was refused on the basis of sound Planning arguments by numerous parties it is now presented and proposed again as a possible site for development.

2. Taking into account the geology and geography of Porth-y-rhyd it is not surprising that there are no suitable sites for developments available. The village lies on the valley floor of the Gwendraeth fach and is within designated flood zones.

3. This development would be an unwarranted and unjustified extension of an isolated area in the countryside. Developing this site would not be a natural development according to Planning Guidances and the site should be refused this time again.

**3826 Mudiad Amddiffyn Porthyrhyd (Mrs M E Evans) [619]****Object****Summary:**

1. Gwrthodwyd y safle hwn.

Roedd hyn yn 2014 yn dilyn misoedd lawer o gynnal profion ac asesiadau gwahanol, o ymgynghori gyda'r asiantaethau perthnasol ac o goladu ffeiliau o dystiolaeth o amrywiol ffynonellau.

Daethpwyd i'r penderfyniad unfrydol nad oedd yn safle addas ar gyfer ei ddatblygu.

Dyna oedd barn y trigolion lleol (300 ohonynt wedi arwyddo Deiseb). Dyna oedd barn M.A.P o gasglu dystiolaeth.

Dyna oedd barn Ymgynghorydd Cynllunio annibynnol a luniodd adroddiad ar ran Cyngor Cymuned Llanddarog. Dyna oedd casgliad yr Adain Blaen-Gynllunio yn dilyn asesiadau trylwyr. Dyna oedd penderfyniad y Cyngor Sir yn seiliedig ar broses cadarn a rhesymegol. Dyna hefyd oedd dyfarniad terfynol yr Arolygydd Annibynnol yn dilyn y Gwrandawriad Cyhoeddus yn 2014.

2. Pryderaf oherwydd bod y safle hwn yn agos iawn at y Brif Bibell Ddŵr.

1. This site was turned down and refused as an allocation.

This was in 2014 following many months of various tests and assessments, deliberations with agencies and collating evidence and statements from different sources.

It was decided unanimously that the field in question was an unsuitable site for development.

That was the opinion of the residents (300 signed the Petition). That was the view of M.A.P following the gathering of evidence. That was the view of an Independent Planning Consultant who compiled a report on behalf of the Llanddarog Community Council. That was the recommendation of the Forward Planning Department following thorough assessments. That was the decision of the County Council based on a robust and rational selection process. That was the final judgement of the independent Inspector following the Public Hearing.

2. I have grave concerns as this proposed site is within close proximity to the strategic Main Water Pipeline

*Council's Initial Response*

**Mae dyraniad y safle yn y CDLI at ddibenion preswyl wedi cael ei ystyried yn llawn trwy'r fethodoleg asesu safleoedd. Fel rhan o'r broses asesu hon, paratowyd ffurflen safle fanwl.**

**Ystyrir bod polisiâu a chynigion y CDLI yn rhai cadarn y gellir eu cyflawni, o sylfaen dystiolaeth gadarn ac wedi'u llunio gan ystyried yr Arfarniad Cynaliadwyedd ac mewn modd sy'n gyson ag ef. Mae'r dyraniad a nodir yn y CDLI yn gwneud darpariaeth ddigonol ar gyfer anghenion tai y setliad hwn.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. The allocation identified within the LDP makes sufficient provision for the housing needs of this settlement.**

*Action*

**Dim newid i'r Cynllun.**

**No change to the Plan.**

*Representation(s)*

**3418 Miss Fiona Morgan [3398]**

**Object**

*Summary:*

We strongly object to the proposed development site SuV20/h1 for numerous reasons:

Allowing this development would have a detrimental effect on our lives.

Developing this site would be out of character with existing properties in this part of the village.

This is a very wet and saturated field. We are very worried about our children's safety as there would be another entrance to the proposed development site.

There aren't enough places for local children at the local school as it stands. We are worried as to the effect a development would have on the village and on the community.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. The allocation identified within the LDP make sufficient provision for part of the housing/employment needs of this settlement.**

*Action*

**No change to the Plan.**

**Representation(s)****3385 Llanddarog Community Council (Mr Gary Evans) [41]****Object****Summary:**

Yn 2012, comisiynodd Cyngor Cymuned Llanddarog Ymgynghorydd Cynllunio Annibynnol i lunio Adroddiad Adolygu Safleoedd ar gyfer pob un o'r saith safle amgen sy'n cael eu hystyried i'w datblygu bryd hynny. Roedd y safle y cyfeirir ato bellach fel SuV20/h1 yn un o'r safleoedd amgen arfaethedig hynny. Nododd yr adroddiad yn bendant y byddai eu cynnwys yn groes i bolisiau a chanllawiau cynllunio lleol a cenedlaethol.

Llanddarog Community Council Registers its Objection to the inclusion of proposed site SuV20/h1.

In 2012, Llanddarog Community Council commissioned an Independent Planning Consultant to compile a Site Review Report for all seven alternative sites being considered for development at that time. The site now referenced as SuV20/h1 was one of those proposed alternative sites. The report stated categorically that 'their inclusion would be contrary to both local and national planning policies and guidance.'

**Council's Initial Response**

**Mae dyraniad y safle yn y CDLI at ddibenion preswyl wedi cael ei ystyried yn llawn trwy'r fethodoleg asesu safleoedd. Fel rhan o'r broses asesu hon, paratowyd ffurflen safle fanwl.**

**Ystyrir bod polisiau a chynigion y CDLI yn rhai cadarn y gellir eu cyflawni, o sylfaen dystiolaeth gadarn ac wedi'u llunio gan ystyried yr Arfarniad Cynaliadwyedd ac mewn modd sy'n gyson ag ef. Mae'r dyraniad a nodir yn y CDLI yn gwneud darpariaeth ddigonol ar gyfer anghenion tai y setliad hwn.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. The allocation identified within the LDP makes sufficient provision for the housing needs of this settlement.**

**Action**

**Dim newid i'r Cynllun.**

**No change to the Plan.**

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***Representation(s)***

**3696 Mr A Yelland [5045]**

**Support**

***Agent: Evans Banks Planning Limited (Richard Banks) [4967]***

***Summary:***

Support the inclusion of SuV20/h1.

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***Council's Initial Response***

**Support Welcomed.**

**Further evidential work will be required prior to the examination in to the revised LDP**

***Action***

**No change to the Plan**

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**Paragraph HOM1: Housing Allocations, PrC2/h1**

*Representation(s)*

**4171 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement (i.e. Llanelli including Pwll - Prc2).**

**The Council is confident in the deliverability of this site. Feedback from the proponent / landowner (October 2020) states that there will be strong demand and that the site is readily developable in the short term. There is consensus regarding the Plan's Housing Trajectory.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

**(Cross referencing note - the Council's response to representation number 4143 can be found under the Council's response to representations made under policy sp3. The Council's response to representation number 4142 can be viewed under the Council's HOM1 policy responses).**

*Action*

**No Change to the Plan.**



*Representation(s)*

**4298 Persimmon Homes West Wales (Stuart Phillips) [5154]**

**Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement (i.e. Llanelli including Pwll - Prc2).**

**The Council is confident in the deliverability of this site. Feedback from the proponent / landowner (October 2020) states that there will be strong demand and that the site is readily developable in the short term. There is consensus regarding the Plan's Housing Trajectory.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

**(Cross referencing note - the Council's response to representation number 4276 can be found under the Council's response to representations made under policy sp3.**

**The Council's response to representation numbers 4272 and 4275 can be viewed under the Council's HOM1 policy responses).**

*Action*

**No change to the Plan.**



*Representation(s)*

**3909 Evans Banks Planning Limited (Richard Banks) [4967]**

**Object**

*Summary:*

This site has not been the subject of any applications for planning permission to realise the allocation in previous Development Plans. That site was allocated in the 2014 LDP and has not shown any signs of implementation nor active delivery.

The site's retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. We therefore object to the proposed allocation, as its inclusion within the Plan fails the tests of soundness.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement (i.e. Llanelli including Pwll - Prc2).**

**The Council is confident in the deliverability of this site. Feedback from the proponent / landowner (October 2020) states that there will be strong demand and that the site is readily developable in the short term. There is consensus regarding the Plan's Housing Trajectory.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

*Action*

**No change to the Plan.**





*Representation(s)*

**3767 Mr C B Jones [710]**

**Object**

*Summary:*

I feel the LDP does not support the needs of the people of Pwll in the way of cheaper social housing. The site they have included for Pwll in the LDP, which will be a continuation of the last site, which was of expensive housing. The land is beautiful grazing land. My site is of no use agriculturally - (reference can be made to representation 3285 where the respondent's site is promoted this is the 'my site' referred to here). Therefore, Policy HOM1 is objected to due to the fact that prc2/h1 is allocated for housing in the deposit Plan.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement (i.e. Llanelli including Pwll - Prc2).**

**The Council is confident in the deliverability of this site. Feedback from the proponent / landowner (October 2020) states that there will be strong demand and that the site is readily developable in the short term. There is consensus regarding the Plan's Housing Trajectory.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

**As a cross reference aid - the Council's response to representation reference number 3285 can be viewed under the Council's HOM1 policy responses.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, PrC2/h2**

*Representation(s)*

**3677 Mr Adrian Griffiths [5043]**

**Support**

**Agent: Geraint John Planning Ltd (Mr Luke Grattarola) [685]**

*Summary:*

The site within our client's ownership and we fully support this policy and allocation. The site has an outline planning permission, and the site is currently being marketed for developer interest to procure and submit a reserved matters application in due course

*Council's Initial Response*

**Comments noted/support welcomed.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the deliverability of this site. Further communication from the respondent/agent (October 2020) confirms that a reserved matters application has been submitted (Clews Homes).**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period. Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP - however the progress already made is noted - see above. There is consensus between the Council and the respondent regarding the Plan's Housing Trajectory.**

**The Council notes that the reserved matters application is in fact for 15 units and not the 10 which is in the deposit Revised LDP. As such, the Council will increase the allocated figure on this site.**

**Feedback of note in regards policy INF4 is that a scheme has been achieved and agreed with the LPA through the current application process, and will therefore fully accord with the emerging Policy INF4 of the forthcoming LDP.**

*Action*

**Amend the Plan by way of focused change(s) - increase the allocated units for this site, increase the Total Affordable Units in Plan period for this site (policy HOM1:Housing Allocations) and also amend the housing trajectory.**



**Paragraph HOM1: Housing Allocations, PrC2/h4***Representation(s)***3305 Barratt David Wilson Homes (Mrs Francesca Evans) [4879]****Object***Summary:*

Summary : No progress or effort has been made to bring the site forward for a prolonged period. The site is not considered to be deliverable within the Plan period.

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***Council's Initial Response***

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site. Feedback attained from the landowner/developer (November 2020) confirms intent to deliver in accordance with the Plan period.

This feedback outlines the position on the site in terms of planning application (S/38285), notably the resolution to approve by the Council's Planning Committee on the 14th January 2020.

It is stated that supporting surveys and investigations can be found in the documentation submitted as part of the planning application.

It is also stated that planning contributions are agreed and that consultants have been appointed to develop the preferred option for betterment on the site (note the landowner/developer confirms the provisions of policy INF4 are known and will be adhered to by the scheme).

It is also stated that the site will be developed in accordance with the dates set out in the Plan's Housing Trajectory.

It is also stated that there are plans to release a Development Brief to market with a view to appointing a preferred developer in due course.

It should be noted that the landowner/developer has also agreed to complete a Statement of Common Ground (SCOG) detailing timescales, funding, marketing, delivery and viability in regards this site ahead of the LDP Examination.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

It is noted that the development is being progressed by the Llanelli Waterside Joint Venture who have a strong track record in progressing similar developments.

This is a notable site for the settlement in terms of number of units. It should be noted however that there are a number of housing developments already under construction and / or completed within the settlement to date within the Plan period. Notable of which are PrC2/h3 (94 units), PrC2/h13 (29 units), PrC2/h18 (32 units), prc2/h19 (240 units initially) and prc2/h21 (34 units). To this end, the supply of housing across the plan period within the settlement is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period

As a cross reference note - the respondent's site is promoted under representation reference number 3376. The Council's response to this can be viewed under the Council's HOM1 policy responses.

*Action*

**No change to the Plan.**



**Representation(s)****4172 Persimmon Homes West Wales (Stuart Phillips) [5154]****Object****Agent:****WYG PLANNING & ENVIRONMENT (Louise Darch) [598]****Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-15 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

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***Council's Initial Response***

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site. Feedback attained from the landowner/developer (November 2020) confirms intent to deliver in accordance with the Plan period.

This feedback outlines the position on the site in terms of planning application (S/38285), notably the resolution to approve by the Council's Planning Committee on the 14th January 2020.

It is stated that supporting surveys and investigations can be found in the documentation submitted as part of the planning application.

It is also stated that planning contributions are agreed and that consultants have been appointed to develop the preferred option for betterment on the site (note the landowner/developer confirms the provisions of policy INF4 are known and will be adhered to by the scheme).

It is also stated that the site will be developed in accordance with the dates set out in the Plan's Housing Trajectory.

It is also stated that there are plans to release a Development Brief to market with a view to appointing a preferred developer in due course.

It should be noted that the landowner/developer has also agreed to complete a Statement of Common Ground (SCOG) detailing timescales, funding, marketing, delivery and viability in regards this site ahead of the LDP Examination.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

It is noted that the development is being progressed by the Llanelli Waterside Joint Venture who have a strong track record in progressing similar developments.

This is a notable site for the settlement in terms of number of units. It should be noted however that there are a number of housing developments already under construction and / or completed within the settlement to date within the Plan period. Notable of which are PrC2/h3 (94 units), PrC2/h13 (29 units), PrC2/h18 (32 units), prc2/h19 (240 units initially) and prc2/h21 (34 units). To this end, the supply of housing across the plan period within the settlement is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period

(Cross referencing note - the Council's response to representation number 4143 can be found under the Council's response to representations made under policy sp3.

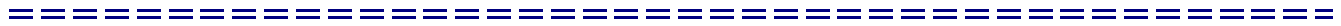
The Council's response to representation number 4142 can be viewed under the

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Council's HOM1 policy responses).

*Action*

**No change to the Plan.**





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**Representation(s)****4299 Persimmon Homes West Wales (Stuart Phillips) [5154]****Object****Agent:****WYG PLANNING & ENVIRONMENT (Louise Darch) [598]****Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-15 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

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***Council's Initial Response***

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site. Feedback attained from the landowner/developer (November 2020) confirms intent to deliver in accordance with the Plan period.

This feedback outlines the position on the site in terms of planning application (S/38285), notably the resolution to approve by the Council's Planning Committee on the 14th January 2020.

It is stated that supporting surveys and investigations can be found in the documentation submitted as part of the planning application.

It is also stated that planning contributions are agreed and that consultants have been appointed to develop the preferred option for betterment on the site (note the landowner/developer confirms the provisions of policy INF4 are known and will be adhered to by the scheme).

It is also stated that the site will be developed in accordance with the dates set out in the Plan's Housing Trajectory.

It is also stated that there are plans to release a Development Brief to market with a view to appointing a preferred developer in due course.

It should be noted that the landowner/developer has also agreed to complete a Statement of Common Ground (SCOG) detailing timescales, funding, marketing, delivery and viability in regards this site ahead of the LDP Examination.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination in to the revised LDP.

It is noted that the development is being progressed by the Llanelli Waterside Joint Venture who have a strong track record in progressing similar developments.

This is a notable site for the settlement in terms of number of units. It should be noted however that there are a number of housing developments already under construction and / or completed within the settlement to date within the Plan period. Notable of which are PrC2/h3 (94 units), PrC2/h13 (29 units), Prc2/h18 (32 units), prc2/h19 (240 units initially) and prc2/h21 (34 units). To this end, the supply of housing across the plan period within the settlement is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period

(Cross referencing note - the Council's response to representation number 4276 can be found under the Council's response to representations made under policy sp3.

The Council's response to representation numbers 4272 and 4275 can be viewed under

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the Council's HOM1 policy responses).

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, PrC2/h5*****Representation(s)*****4173 Persimmon Homes West Wales (Stuart Phillips) [5154]****Object*****Agent:******WYG PLANNING & ENVIRONMENT (Louise Darch) [598]******Summary:***

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-15 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

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*Council's Initial Response*

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site.

Feedback attained from the landowner/developer (November 2020) confirms intent to deliver in accordance with the Plan period.

This feedback indicates that this development site is a continuation of the phase 1 development already delivered on adjacent land and that discussions are taking place between the Llanelli Waterside Joint Venture and Carmarthenshire County Council's Housing Department. The project timescales are aligned with the dates set out in the Site Trajectory Schedule (Housing Trajectory of the Plan). Consideration is being made for up to 100% affordable housing on the site that will meet local need.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

(Cross referencing note - the Council's response to representation number 4143 can be found under the Council's response to representations made under policy sp3. The Council's response to representation number 4142 can be viewed under the Council's HOM1 policy responses).

*Action*

No change to the Plan as a result of this representation / objection.

(However it should be noted that following the feedback received from the landowner/developer (as discussed in Council's response above) an amendment will be made to the Plan by way of focused change to increase the Total Affordable Units in Plan period for this site (policy HOM1:Housing Allocations).



**Representation(s)****4300 Persimmon Homes West Wales (Stuart Phillips) [5154]****Object****Agent:****WYG PLANNING & ENVIRONMENT (Louise Darch) [598]****Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-15 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

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*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the delivery of this site. Feedback attained from the landowner/developer (November 2020) confirms intent to deliver in accordance with the Plan period.**

**This feedback indicates that this development site is a continuation of the phase 1 development already delivered on adjacent land and that discussions are taking place between the Llanelli Waterside Joint Venture and Carmarthenshire County Council's Housing Department. The project timescales are aligned with the dates set out in the Site Trajectory Schedule (Housing Trajectory of the Plan). Consideration is being made for up to 100% affordable housing on the site that will meet local need.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

**(Cross referencing note - the Council's response to representation number 4276 can be found under the Council's response to representations made under policy sp3. The Council's response to representation numbers 4272 and 4275 can be viewed under the Council's HOM1 policy responses).**

*Action*

**No change to the Plan as a result of this representation / objection.**

**(However it should be noted that following the feedback received from the landowner/developer (as discussed in Council's response above) an amendment will be made to the Plan by way of focused change to increase the Total Affordable Units in Plan period for this site (policy HOM1:Housing Allocations).**



**Paragraph HOM1: Housing Allocations, PrC2/h10**

*Representation(s)*

**4567 Mrs Sharon Meek [4220]**

**Object**

*Summary:*

I am writing in regards to the proposed development which are to the back and side of my property, I am extremely concerned as to the effect of these developments on the traffic and damage to the roads. The single track road behind our property is at present only to supply the farm and the few houses of the Dell. If this road is to be used for access to new developments then there is a good possibility that there will be structural damage, caused to the road running behind our house and that of Rock House due to the degrading etc to the road caused by heavy plant machinery and excess traffic. The single track road has less than a meter of land before it drops 30ft off the quarry wall, to the ground on which the two houses sit. In bad weather this bit of land has already started to move, dropping debris down onto the properties. It will also effect the entrance to our drive which is situated on the blind bend leading down from the Dell. Where is the proposed site entrance to be? This is a very large proposal site of agricultural land, when just up the road there has sat a development of houses left to go to ruin. I hope my concerns are heard. This is an objection under policy HOM1 to the allocation of this site for housing in the deposit Plan.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference numbers 3678 and 3074. These can be found within the Council's responses to comments made in regards site prc2/h10 - HOM1 - Housing Allocations.**

*Action*

**No change to the Plan.**





*Representation(s)*

**3306 Barratt David Wilson Homes (Mrs Francesca Evans) [4879] Object**

*Summary:*

BDW objects to the proposed allocation of this site. We have serious concerns regarding its deliverability. The site is a former quarry and is covered by dense vegetation with complicated access arrangements which are affected by Flood Risk Zone C2 constraints. It has not been demonstrated that this site can be accessed without unacceptable flood risk consequences. The site is also brownfield in nature and it should be demonstrated that appropriate ground investigation work has been undertaken to demonstrate that the site is viable and deliverable.

This site should be removed as a draft allocation from the Deposit Revised LDP.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference numbers 3678 and 3074. These can be found within the Council's responses to comments made in regards site prc2/h10 - HOM1 - Housing Allocations.**

**As a cross reference note - the respondent's site is promoted under representation reference number 3376. The Council's response to this can be viewed under the Council's HOM1 policy responses.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3678 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

*Summary:*

Reservations regarding the allocation as it appears to provide important ecological connectivity features. Loss of ecosystem connectivity would be at odds with the fundamental aims of maintaining and enhancing biodiversity and Section 6, Part 1 of the Environment (Wales) Act 2016

*Council's Initial Response*

**In noting the concerns raised, the proponent / landowner has undertaken further work further to which Natural Resources Wales have confirmed in writing (November 2020) that there is a way forward.**

**In this regard, the site will be retained as an allocation and it is not proposed to remove the site as a focused change.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3074 Mr Bowler [651]**

**Support**

*Summary:*

- 1. Positive redevelopment of a brownfield site
- 2. Support of local residents.
- 3. Viable and sustainable
- 4. Local approval

*Council's Initial Response*

**Comments noted/ support welcomed.  
(This representation is from the landowner/developer of the site).**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the delivery of this site.**

**Further feedback from the respondent / developer (November 2020) confirms intent to deliver in accordance with the Plan period.**

**Also, there has been an effort to respond to concerns raised by Natural Resources Wales. Reference should be made to the Council's response to representation reference number 3678 in this regard. This can be found within the Council's responses to comments made in regards site prc2/h10 - HOM1 - Housing Allocations.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period. Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

**Further feedback from the respondent / developer (November 2020) refers to a proven track record as a local developer in the delivery of housing in the Llanelli area and that the opportunity to work collaboratively with the Council in securing the allocation and its future delivery on the ground is welcomed. There is consensus on the trajectory. Also, of note with reference to policy INF4 is the feedback that a scheme of surface water removal from an off-site receptor site within the ownership of the respondent / developer has been designed.**

*Action*

**No change to the Plan.**



**Representation(s)**

**3075 Mrs Julie Morris [4806] Support**

**Summary:**

I am interested in living on the site and believe this is a lovely opportunity for a unique development.

Please make this be adopted

**4116 Stradey Estate (Mr Edward Mansel Lewis) [5122] Support**

**Agent: Geraint John Planning Ltd (Mr Luke Grattarola) [685]**

**Summary:**

The Stradey Estate fully support the site's inclusion.

**3115 Mrs Diane Phillips [4840] Support**

**Summary:**

Planning for brownfield sites such as this one is important. Great to see this site included for residential development. This gives local people the opportunity to build quality homes in the area in which they live. Good to see smaller sites available for this purpose as opposed to large, national house builders.

**3088 Mr Darren Conway [4821] Support**

**Summary:**

I wholeheartedly support the inclusion of this site as it is a place I would like to live. There needs to be sites like this with individuality and style. It is redevelopment of brown land and has great links to the furnace village.

**3089 MR GARETH PHILLIPS [3164] Support**

**Summary:**

I have lived in Furnace all my life and have been looking for a plot to build a suitable home for my growing family for nearly ten years. If this project is approved it will allow my family to stay in the Furnace/Llanelli area where we will continue to be a part of and support the local community and local businesses.

**Council's Initial Response**

**Comments noted/ support welcomed.**

**Reference should be made to the Council's response to representation reference numbers 3678 and 3074. These can be found within the Council's responses to comments made in regards site prc2/h10 - HOM1 - Housing Allocations.**

**Action**

**No change to the Plan.**

**Paragraph HOM1: Housing Allocations, PrC2/h11*****Representation(s)*****4252 - RSAI - [4993]****Object*****Agent: Lichfields (Mr Arwel Evans) [3166]******Summary:***

We question the continued allocation of this site and whether a redevelopment proposal is realistic and deliverable. The site was an allocation in the previous LDP and failed to come to fruition. There are a number of barriers to the redevelopment of this site including existing occupied dwellings on site and ecological issues. No developer is on board and no planning application has been submitted despite allocation in the previous LDP. We also question the suitability of the site from a sustainability perspective given that no local facilities or services can be accessed by sustainable means of transport such as walking. The LDP states that dwellings will be delivered in the 0-5 year and 5-10-year timescale. We question whether completions on this site is possible within the 0-5 year timescale. Reference is made to rep 4243 where the client's site is promoted.

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*Council's Initial Response*

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site.

Feedback attained from the developer / landowner (November 2020) confirms intent to deliver in accordance with the Plan period.

Delivery of this site has been highlighted as a priority for the Council and survey works are already underway. Ecological surveys are to continue in December 2020 (Bat Hibernation Surveys). A variety of ecology studies have been programmed throughout the year of 2021 to capture the many different species that have been identified on the site. The survey dates for the ecology studies are provided also in the feedback. It is also stated that due to the extensive survey work that is due to take place, it is recommended to move the projections on a year or two, which will also account for the planning process and procurement of works.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP - however it is noted that much evidential work has already been completed / surveys being or to be undertaken (see above).

As a cross reference note - the respondent's site is promoted under representation reference number 4243. The Council's response to this can be viewed under the Council's HOM1 policy responses.

*Action*

No change to the Plan as a result of this representation / objection.

(However it should be noted that following the feedback received from the landowner/developer (as discussed in Council's response above) an amendment will be made to the Plan by way of focused change to the housing trajectory for this site).



**Representation(s)****4174 Persimmon Homes West Wales (Stuart Phillips) [5154]****Object****Agent:****WYG PLANNING & ENVIRONMENT (Louise Darch) [598]****Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

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*Council's Initial Response*

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site. Feedback attained from the developer / landowner (November 2020) confirms intent to deliver in accordance with the Plan period. Delivery of this site has been highlighted as a priority for the Council and survey works are already underway. Ecological surveys are to continue in December 2020 (Bat Hibernation Surveys). A variety of ecology studies have been programmed throughout the year of 2021 to capture the many different species that have been identified on the site. The survey dates for the ecology studies are provided also in the feedback. It is also stated that due to the extensive survey work that is due to take place, it is recommended to move the projections on a year or two, which will also account for the planning process and procurement of works.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period. Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP - however it is noted that much evidential work has already been completed / surveys being or to be undertaken (see above).

(Cross referencing note - the Council's response to representation number 4143 can be found under the Council's response to representations made under policy sp3. The Council's response to representation number 4142 can be viewed under the Council's HOM1 policy responses).

*Action*

No change to the Plan as a result of this representation / objection.

(However it should be noted that following the feedback received from the landowner/developer (as discussed in Council's response above) an amendment will be made to the Plan by way of focused change to the housing trajectory for this site).





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**Representation(s)****4301 Persimmon Homes West Wales (Stuart Phillips) [5154]****Object****Agent:****WYG PLANNING & ENVIRONMENT (Louise Darch) [598]****Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

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*Council's Initial Response*

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site.

Feedback attained from the developer / landowner (November 2020) confirms intent to deliver in accordance with the Plan period.

Delivery of this site has been highlighted as a priority for the Council and survey works are already underway. Ecological surveys are to continue in December 2020 (Bat Hibernation Surveys). A variety of ecology studies have been programmed throughout the year of 2021 to capture the many different species that have been identified on the site. The survey dates for the ecology studies are provided also in the feedback. It is also stated that due to the extensive survey work that is due to take place, it is recommended to move the projections on a year or two, which will also account for the planning process and procurement of works.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP - however it is noted that much evidential work has already been completed / surveys being or to be undertaken (see above).

Cross referencing note - the Council's response to representation number 4276 can be found under the Council's response to representations made under policy sp3.

The Council's response to representation numbers 4272 and 4275 can be viewed under the Council's HOM1 policy responses).

*Action*

No change to the Plan as a result of this representation / objection.

(However it should be noted that following the feedback received from the landowner/developer (as discussed in Council's response above) an amendment will be made to the Plan by way of focused change to the housing trajectory for this site).



**Paragraph HOM1: Housing Allocations, PrC2/h15**

*Representation(s)*

**3377 Mr C Hurley [4688]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Allocated in the 2014 LDP and yet remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. Its retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. The client's site is promoted under rep 4186.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 4187. This can be found within the Council's responses to comments made in regards site prc2/h15 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation reference number 4186 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**



*Representation(s)*

**3624 Mr B.O. Beynon [5011]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Allocated in the 2014 LDP and yet remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. Its retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. Reference is made to rep 3597 where the client's land is promoted.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 4187. This can be found within the Council's responses to comments made in regards site prc2/h15 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation reference number 3597 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**



*Representation(s)*

**3639 Mr & Mrs V & J Griffiths [555]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Allocated in the 2014 LDP and yet remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. Its retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. Reference is made to reps 3621 and 3637 where the client's land is promoted.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 4187. This can be found within the Council's responses to comments made in regards site prc2/h15 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation reference numbers 3621 and 3637 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**



*Representation(s)*

**4097 Mr & Mrs K & T Jones [4052]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Allocated in the 2014 LDP and yet remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. Its retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. Reference is made to rep 4096 where the client's land is promoted.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 4187. This can be found within the Council's responses to comments made in regards site prc2/h15 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation reference number 4096 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**



*Representation(s)*

**4119 Mr B.O. Beynon [5011]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Allocated in the 2014 LDP and yet remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. Its retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. Reference is made to rep 4118 where the client's land is promoted.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 4187. This can be found within the Council's responses to comments made in regards site prc2/h15 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation reference number 4118 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**



*Representation(s)*

**3933 Evans Banks Planning Limited (Richard Banks) [4967]**

**Object**

*Summary:*

Allocated in the in the 2014 LDP and yet remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. The site's retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. We therefore object to the proposed allocation, as its inclusion within the Plan fails the tests of soundness.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 4187. This can be found within the Council's responses to comments made in regards site prc2/h15 - HOM1 - Housing Allocations.**

*Action*

**No change to the Plan.**





**Representation(s)****4187 Tata Steel Europe Limited ( \_ \_ \_ ) [5156]****Support****Agent: Turley Associates Ltd (Abi Roberts) [4717]****Summary:**

Our client strongly supports the proposed residential allocation. The proposed allocation reflects that the site benefits from a resolution to grant outline planning permission, subject to a S106 agreement (reference: S/34991), for a residential development of up to 94 units. Our client's solicitors are currently in advanced dialogue with Carmarthenshire County Council to complete the S106 as soon as possible. Initial 'soft' marketing of the site has been undertaken by a Property Consultancy (information enclosed for further details - letter dated 27/3/20). This has demonstrated that there is demand in the market for the site, with two developers having already noted their interest in the development and have submitted provisional offers. The Property Consultancy have been instructed to request final offers as soon as planning permission has been received. The initial interest received to date confirms that the site is viable and deliverable in the short term. Reference may be made to representation 4191.

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***Council's Initial Response***

**Comments noted/support welcomed.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the delivery of this site.**

**A Statement of Common Ground (SoCG), along with a Viability and Deliverability Statement, were submitted in November 2020.**

**Of note within the SoCG (in regards Trajectory and Timescale) is that it is stated that the anticipated commencement date and delivery rates are both considered reasonable and that it is agreed that there are no impediments to the delivery of the proposed allocation. It is stated that the site is expected to be brought forward in line with the identified housing trajectory, with marketing expected to commence shortly after completion of the Section 106 Agreement and issuing of the formal planning permission.**

**It is stated that the content of this SoCG reflects the advanced position of the Site, which is subject to a resolution to grant outline planning permission for up to 94 homes (Ref: S/34991). The Site has therefore already been subject to rigorous assessment by the Local Planning Authority, together with extensive consultation with statutory consultees and the wider community. A schematic layout plan of the development (a Concept Masterplan) is appended to the SoCG. It is stated that initial 'soft' marketing of the Site has already been undertaken (in 2019). It is stated that this process has demonstrated that there is demand in the market for the site, with two developers having already noted their interest in the development and have submitted provisional offers. It is stated that since the initial marketing of the Site, further expressions of interest have been received from developers who have indicated that they will be looking to tender.**

**A Viability and Deliverability Statement has also been provided which states that the prospective development of the site passes the test of being deliverable and viable for the purposes of supporting its allocation.**

**Note the SoCG has yet to signed / formally agreed by the Council. Also, the viability information can be reviewed as appropriate.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP - however it is noted that much evidential work has already been completed (see above).**

**This is a notable site for the settlement in terms of number of units. It should be noted**

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however that there are a number of housing developments already under construction and / or completed within the settlement to date within the Plan period. Notable of which are PrC2/h3 (94 units), PrC2/h13 (29 units), Prc2/h18 (32 units), prc2/h19 (240 units initially) and prc2/h21 (34 units). To this end, the supply of housing across the plan period within the settlement is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period

In regards representation reference number 4191 - reference is made to the Council's responses to representations as set out under policy HOM1.

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, PrC2/h16*****Representation(s)*****3378 Mr C Hurley [4688]****Object*****Agent: JCR Planning Ltd (Mr Craig Jones) [4665]******Summary:***

Allocated in the 2014 LDP and yet remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. Its retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. The client's site is promoted under rep 4186.

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*Council's Initial Response*

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site.

Feedback attained from the developer / landowner (November 2020) outlines that contracts were recently exchanged. The purchaser's planning consultants are working on a full planning application for the residential development along with care home facility on the site. The site is currently going through the Pre-Application Consultation (PAC) process and a planning application is expected to be submitted by the end of this year.

It is noted that Asbri Planning Ltd. has been commissioned by Padda Care Ltd. to undertake pre-application consultation in this regard.

It is considered that the trajectory date should be moved forward to 2024/2025 for completion of residential development on the site given this progress.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

(Cross referencing note - the Council's response to representation reference number 4186 can be viewed under the Council's HOM1 policy responses)

*Action*

No change to the Plan as a result of this representation / objection.

(However it should be noted that following the feedback received from the landowner/developer (as discussed in Council's response above) an amendment will be made to the Plan by way of focused change to the housing trajectory for this site).



**Representation(s)****3626 Mr B.O. Beynon [5011]****Object****Agent: Evans Banks Planning Limited (Richard Banks) [4967]****Summary:**

Allocated in the 2014 LDP and yet remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. Its retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. Reference is made to rep 3597 where the client's land is promoted.

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*Council's Initial Response*

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site.

Feedback attained from the developer / landowner (November 2020) outlines that contracts were recently exchanged. The purchaser's planning consultants are working on a full planning application for the residential development along with care home facility on the site. The site is currently going through the Pre-Application Consultation (PAC) process and a planning application is expected to be submitted by the end of this year.

It is noted that Asbri Planning Ltd. has been commissioned by Padda Care Ltd. to undertake pre-application consultation in this regard.

It is considered that the trajectory date should be moved forward to 2024/2025 for completion of residential development on the site given this progress.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

(Cross referencing note - the Council's response to representation reference number 3597 can be viewed under the Council's HOM1 policy responses)

*Action*

No change to the Plan as a result of this representation / objection.

(However it should be noted that following the feedback received from the landowner/developer (as discussed in Council's response above) an amendment will be made to the Plan by way of focused change to the housing trajectory for this site).



**Representation(s)****3640 Mr & Mrs V & J Griffiths [555]****Object****Agent: Evans Banks Planning Limited (Richard Banks) [4967]****Summary:**

Allocated in the 2014 LDP and yet remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. Its retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. Reference is made to reps 3621 and 3637 where the client's land is promoted.

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*Council's Initial Response*

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site.

Feedback attained from the developer / landowner (November 2020) outlines that contracts were recently exchanged. The purchaser's planning consultants are working on a full planning application for the residential development along with care home facility on the site. The site is currently going through the Pre-Application Consultation (PAC) process and a planning application is expected to be submitted by the end of this year.

It is noted that Asbri Planning Ltd. has been commissioned by Padda Care Ltd. to undertake pre-application consultation in this regard.

It is considered that the trajectory date should be moved forward to 2024/2025 for completion of residential development on the site given this progress.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

(Cross referencing note - the Council's response to representation reference numbers 3621 and 3637 can be viewed under the Council's HOM1 policy responses)

*Action*

No change to the Plan as a result of this representation / objection.

(However it should be noted that following the feedback received from the landowner/developer (as discussed in Council's response above) an amendment will be made to the Plan by way of focused change to the housing trajectory for this site).



**Representation(s)****4098 Mr & Mrs K & T Jones [4052]****Object****Agent: Evans Banks Planning Limited (Richard Banks) [4967]****Summary:**

Allocated in the 2014 LDP and yet remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. Its retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. Reference is made to rep 4096 where the client's land is promoted.

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*Council's Initial Response*

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site.

Feedback attained from the developer / landowner (November 2020) outlines that contracts were recently exchanged. The purchaser's planning consultants are working on a full planning application for the residential development along with care home facility on the site. The site is currently going through the Pre-Application Consultation (PAC) process and a planning application is expected to be submitted by the end of this year.

It is noted that Asbri Planning Ltd. has been commissioned by Padda Care Ltd. to undertake pre-application consultation in this regard.

It is considered that the trajectory date should be moved forward to 2024/2025 for completion of residential development on the site given this progress.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

(Cross referencing note - the Council's response to representation reference number 4096 can be viewed under the Council's HOM1 policy responses)

*Action*

No change to the Plan as a result of this representation / objection.

(However it should be noted that following the feedback received from the landowner/developer (as discussed in Council's response above) an amendment will be made to the Plan by way of focused change to the housing trajectory for this site).



**Representation(s)****4120 Mr B.O. Beynon [5011]****Object****Agent: Evans Banks Planning Limited (Richard Banks) [4967]****Summary:**

Allocated in the 2014 LDP and yet remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. Its retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. Reference is made to rep 4118 where the client's land is promoted.

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*Council's Initial Response*

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site.

Feedback attained from the developer / landowner (November 2020) outlines that contracts were recently exchanged. The purchaser's planning consultants are working on a full planning application for the residential development along with care home facility on the site. The site is currently going through the Pre-Application Consultation (PAC) process and a planning application is expected to be submitted by the end of this year.

It is noted that Asbri Planning Ltd. has been commissioned by Padda Care Ltd. to undertake pre-application consultation in this regard.

It is considered that the trajectory date should be moved forward to 2024/2025 for completion of residential development on the site given this progress.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

(Cross referencing note - the Council's response to representation reference number 4118 can be viewed under the Council's HOM1 policy responses)

*Action*

No change to the Plan as a result of this representation / objection.

(However it should be noted that following the feedback received from the landowner/developer (as discussed in Council's response above) an amendment will be made to the Plan by way of focused change to the housing trajectory for this site).



*Representation(s)*

**3927 Evans Banks Planning Limited (Richard Banks) [4967]**

**Object**

*Summary:*

Allocated in the in the 2014 LDP and yet remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. The site's retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. We therefore object to the proposed allocation, as its inclusion within the Plan fails the tests of soundness.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the delivery of this site.**

**Feedback attained from the developer / landowner (November 2020) outlines that contracts were recently exchanged. The purchaser's planning consultants are working on a full planning application for the residential development along with care home facility on the site. The site is currently going through the Pre-Application Consultation (PAC) process and a planning application is expected to be submitted by the end of this year.**

**It is noted that Asbri Planning Ltd. has been commissioned by Padda Care Ltd. to undertake pre-application consultation in this regard.**

**It is considered that the trajectory date should be moved forward to 2024/2025 for completion of residential development on the site given this progress.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

*Action*

**No change to the Plan as a result of this representation / objection.**

**(However it should be noted that following the feedback received from the landowner/developer (as discussed in Council's response above) an amendment will be made to the Plan by way of focused change to the housing trajectory for this site).**



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**Representation(s)****4176 Persimmon Homes West Wales (Stuart Phillips) [5154]****Object****Agent:****WYG PLANNING & ENVIRONMENT (Louise Darch) [598]****Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 11-15 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

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*Council's Initial Response*

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site.

Feedback attained from the developer / landowner (November 2020) outlines that contracts were recently exchanged. The purchaser's planning consultants are working on a full planning application for the residential development along with care home facility on the site. The site is currently going through the Pre-Application Consultation (PAC) process and a planning application is expected to be submitted by the end of this year.

It is noted that Asbri Planning Ltd. has been commissioned by Padda Care Ltd. to undertake pre-application consultation in this regard.

It is considered that the trajectory date should be moved forward to 2024/2025 for completion of residential development on the site given this progress.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

(Cross referencing note - the Council's response to representation number 4143 can be found under the Council's response to representations made under policy sp3.

The Council's response to representation number 4142 can be viewed under the Council's HOM1 policy responses).

*Action*

No change to the Plan as a result of this representation / objection.

(However it should be noted that following the feedback received from the landowner/developer (as discussed in Council's response above) an amendment will be made to the Plan by way of focused change to the housing trajectory for this site).





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**Representation(s)****4302 Persimmon Homes West Wales (Stuart Phillips) [5154]****Object****Agent:****WYG PLANNING & ENVIRONMENT (Louise Darch) [598]****Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 11-15 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

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*Council's Initial Response*

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site.

Feedback attained from the developer / landowner (November 2020) outlines that contracts were recently exchanged. The purchaser's planning consultants are working on a full planning application for the residential development along with care home facility on the site. The site is currently going through the Pre-Application Consultation (PAC) process and a planning application is expected to be submitted by the end of this year.

It is noted that Asbri Planning Ltd. has been commissioned by Padda Care Ltd. to undertake pre-application consultation in this regard.

It is considered that the trajectory date should be moved forward to 2024/2025 for completion of residential development on the site given this progress.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

(Cross referencing note - the Council's response to representation number 4276 can be found under the Council's response to representations made under policy sp3.

The Council's response to representation numbers 4272 and 4275 can be viewed under the Council's HOM1 policy responses).

*Action*

No change to the Plan as a result of this representation / objection.

(However it should be noted that following the feedback received from the landowner/developer (as discussed in Council's response above) an amendment will be made to the Plan by way of focused change to the housing trajectory for this site).



**Paragraph HOM1: Housing Allocations, PrC2/h18**

*Representation(s)*

**4177 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**Comments noted**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the deliverability of this site. The site is already under construction with a number of units already completed.**

**(Cross referencing note - the Council's response to representation number 4143 can be found under the Council's response to representations made under policy sp3. The Council's response to representation number 4142 can be viewed under the Council's HOM1 policy responses).**

*Action*

**No change to the Plan**



*Representation(s)*

**4303 Persimmon Homes West Wales (Stuart Phillips) [5154]**

**Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**Comments noted**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the deliverability of this site. The site is already under construction with a number of units already completed.**

**(Cross referencing note - the Council's response to representation number 4276 can be found under the Council's response to representations made under policy sp3. The Council's response to representation numbers 4272 and 4275 can be viewed under the Council's HOM1 policy responses).**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, PrC2/h19**

*Representation(s)*

**4395 David Tudor Davies [2770]**

**Support**

*Summary:*

Original candidate site area SR/086/007. Interest in developing the site has intensified as indicated by letter, (copy provided) inviting us owners to discuss matters further with them. Talks are currently ongoing. Support under policy HOM1. The candidate site has been included in that area that has been re allocated as part of prc2/h19 and the representation form states support for prc2/h19.

*Council's Initial Response*

**Comments noted/support welcomed.**

**The allocation of site PrC2/h19 within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the deliverability of PrC2/h19. The majority is already under construction under S/33342 - 240 units.**

**Turning to the area of PrC2/h19 covered by candidate site SR/086/007 (to which this representation relates), communication received in October 2020 confirms developer intention (a national housebuilder and current landowner have both responded). An initial offer is currently being negotiated. An interest in the site is established. It is however stated that this parcel of land has capacity for 30 units as opposed the 20 allowed for in the deposit Plan - this is based on a high level analysis of the site by the interested party / developer. There is consensus regarding the Plan's Housing Trajectory.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

*Action*

**Amend the Plan by way of focused change(s) - increase the allocated units for this site, increase the Total Affordable Units in Plan period for this site (policy HOM1:Housing Allocations) and also amend the housing trajectory.**



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## Paragraph HOM1: Housing Allocations, PrC2/h20

### *Representation(s)*

**3189 E P A Alcock [4484]**

**Object**

***Summary:***

My reasonings are as follows :

- 1) inadequate infrastructure / drainage and sewerage.
- 2) it is the Only safe green area for the young children to play on in the site, and it is also used annually for a summer fete.
- 3) the road is already unable to cope with the amount of existing traffic and parking. Building additional houses in this area will only make the problem worse!
- 4) the wildlife habitat is already compromised and will be damaged even more if this project goes ahead.
- 5) extra construction traffic to complete this project will cause chaos due to the narrow roads and reduce access for the residents.
- 6) finally, it is also very difficult for services such as refuge collection and, more importantly, ambulances and fire engines to access the culdesac that I on, which is directly opposite the proposed development site. I do worry that the new site development will make it even more difficult for the residents to have access to emergence services should they need them.

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**3228 E P A Alcock [4484]**

**Object**

***Summary:***

There is inadequate infrastructure drainage/Sewerage and access. This is the only safe green area for young children to play and used annually for fete etc. The road dynamics are unable to cope with existing traffic, parking & access. Wildlife habitat has already compromised and this would damage even more. Construction traffic will cause chaos and upheaval to residents. This area is a small strip of green land not originally built on deemed unsuitable and is unrealistic for housing development due to cul-de-sac to accommodate traffic. A more accessible realistic site should be sought not a small strip of green land like this. This is therefore an objection to policy HOM1 seeking the deletion of this site as a housing allocation.

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**3111 Mr Richard Roach [4838]**

**Object**

***Summary:***

I object to the plans because this is a playing area for the children, to play to be safe and most important to be seen! It has been a play area for many years and hopefully will remain a play area!! There is also pylon above the area where houses should not be built!! We have open days throughout the year where all the neighbours get involved with thier family's on this play area!!

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*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the delivery of this site. Feedback attained from the developer / landowner (November 2020) confirms intent to deliver in accordance with the Plan period. This feedback states that this site is identified as a candidate site for the Welsh Government's newly developed Self Build Wales scheme. The purpose of the scheme is to allow potential home owners to build their own home in a place they want to live with assistance from the Development Bank of Wales who provide a 2 year interest free loan for the construction of the home. It is stated that the Development Bank of Wales is already receiving interest in the site which has been generated through the Welsh Government Self Build webpage.**

**The proposed site layout, design and costings are currently being finalised by the Council prior to submission of planning permission.**

**In terms of the trajectory, the feedback indicates that it may be appropriate to split the units over 2022/23 and 2023/24 to take into account that they are self-build plots and could be developed at different times**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period. Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP - however it is noted that much evidential work has already been completed (see above).**

**It is considered that the concerns over open space / play space would have formed part of previous planning application deliberations and can be considered within any future planning application(s) as and where appropriate.**

*Action*

**No change to the Plan as a result of this representation / objection.**

**(However it should be noted that following the feedback received from the landowner/developer (as discussed in Council's response above) an amendment will be made to the Plan by way of focused change to the housing trajectory for this site).**



**Representation(s)****4178 Persimmon Homes West Wales (Stuart Phillips) [5154]****Object****Agent:****WYG PLANNING & ENVIRONMENT (Louise Darch) [598]****Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

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*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the delivery of this site. Feedback attained from the developer / landowner (November 2020) confirms intent to deliver in accordance with the Plan period. This feedback states that this site is identified as a candidate site for the Welsh Government's newly developed Self Build Wales scheme. The purpose of the scheme is to allow potential home owners to build their own home in a place they want to live with assistance from the Development Bank of Wales who provide a 2 year interest free loan for the construction of the home. It is stated that the Development Bank of Wales is already receiving interest in the site which has been generated through the Welsh Government Self Build webpage.**

**The proposed site layout, design and costings are currently being finalised by the Council prior to submission of planning permission.**

**In terms of the trajectory, the feedback indicates that it may be appropriate to split the units over 2022/23 and 2023/24 to take into account that they are self-build plots and could be developed at different times**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period. Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP - however it is noted that much evidential work has already been completed (see above).**

**(Cross referencing note - the Council's response to representation number 4143 can be found under the Council's response to representations made under policy sp3. The Council's response to representation number 4142 can be viewed under the Council's HOM1 policy responses).**

*Action*

**No change to the Plan as a result of this representation / objection.**

**(However it should be noted that following the feedback received from the landowner/developer (as discussed in Council's response above) an amendment will be made to the Plan by way of focused change to the housing trajectory for this site).**



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**Representation(s)****4304 Persimmon Homes West Wales (Stuart Phillips) [5154]****Object****Agent:****WYG PLANNING & ENVIRONMENT (Louise Darch) [598]****Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

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*Council's Initial Response*

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site. Feedback attained from the developer / landowner (November 2020) confirms intent to deliver in accordance with the Plan period. This feedback states that this site is identified as a candidate site for the Welsh Government's newly developed Self Build Wales scheme. The purpose of the scheme is to allow potential home owners to build their own home in a place they want to live with assistance from the Development Bank of Wales who provide a 2 year interest free loan for the construction of the home. It is stated that the Development Bank of Wales is already receiving interest in the site which has been generated through the Welsh Government Self Build webpage.

The proposed site layout, design and costings are currently being finalised by the Council prior to submission of planning permission.

In terms of the trajectory, the feedback indicates that it may be appropriate to split the units over 2022/23 and 2023/24 to take into account that they are self-build plots and could be developed at different times

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period. Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP - however it is noted that much evidential work has already been completed (see above).

(Cross referencing note - the Council's response to representation number 4276 can be found under the Council's response to representations made under policy sp3. The Council's response to representation numbers 4272 and 4275 can be viewed under the Council's HOM1 policy responses).

*Action*

**No change to the Plan as a result of this representation / objection.**

(However it should be noted that following the feedback received from the landowner/developer (as discussed in Council's response above) an amendment will be made to the Plan by way of focused change to the housing trajectory for this site).



**Paragraph HOM1: Housing Allocations, PrC2/h22*****Representation(s)*****3379 Mr C Hurley [4688]****Object*****Agent: JCR Planning Ltd (Mr Craig Jones) [4665]******Summary:***

Allocated within the Carmarthenshire Unitary Development Plan (2003) and the Local Development Plan (2014). Not been subject of any detailed planning application, let alone market interest. It remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. Its retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. The client's site is promoted under rep 4186.

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***Council's Initial Response***

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the delivery of this allocation. It should be noted that the majority of the allocation is within the ownership of Carmarthenshire County Council.**

**Feedback attained from the landowner/developer (December 2020) confirms intent to deliver that part of the allocation in the Council's ownership in accordance with the Plan period.**

**This feedback outlines the following with regards the County Council's land: This part of the allocation has been through the Pre-Application Consultation (PAC) process during 2019 and an outline planning application for up to 202 units was validated on the 12th June 2020 (Planning application no. S/40692). The masterplan for this development is provided and further surveys and site information can be found within the documentation submitted as part of the planning application. It is also stated that part of the planning application site area, known as 'Y Waun', is included within the Council's New Build Programme. It is likely that the remainder of the planning application site area will be openly marketed for delivery by the private sector. Of note is the acknowledgment of Policy INF4 and that such matters are being considered as part of the Drainage Strategy for the application site, whilst it is also confirmed that it will be developed within the timescales set out in the Deposit plan's Housing Trajectory.**

**It should be noted that the Council has committed to completing a Statement of Common Ground (SCOG), whilst reference is also made to the fact that the planning application for this site has advanced and consultation has already been carried out with statutory consultees. Also, there is a commitment to provide a viability assessment in due course.**

**The Council also states that initial discussions have taken place with the adjoining landowner and their agent. It is stated that the masterplan of the Council site includes access points to the adjoining land and that further discussions to formalise access agreements will take place in due course.**

**Further to the above, it should be noted that feedback has also been received (November 2020) from the agent representing the owners of that parcel of the allocation which is not in the ownership of Carmarthenshire County Council. This feedback states that "on the basis that access to our site is maintained in conjunction with the local authority site and indeed that part is developed and suitably serviced, it is the intention to develop the site in accordance with the timescales set out in the Deposit plan's Housing Trajectory".**

**The feedback refers to delivery in the latter period of the Plan.**

**It is also stated that there are discussions with the adjoining landowner, being the**

local authority, in respect of access arrangements between the respective parcels, but that there is confidence that an arrangement can be arrived at which will enable the allocation to be developed in its entirety. Of note also is the fact that the requirement of policy INF4 is acknowledged.

Sufficient evidence has been provided to prove the whole allocation is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

It is considered that based upon the above feedback, that the '3rd party' parcel of land (i.e. the land outside of the ownership of Carmarthenshire County Council) would be developed later in the Plan period.

This is a notable site for the settlement in terms of number of units. It should be noted however that there are a number of housing developments already under construction and / or completed within the settlement to date within the Plan period. Notable of which are PrC2/h3 (94 units), PrC2/h13 (29 units), Prc2/h18 (32 units), prc2/h19 (240 units initially) and prc2/h21 (34 units). To this end, the supply of housing across the plan period within the settlement is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.

(Cross referencing note - the Council's response to representation reference number 4186 can be viewed under the Council's HOM1 policy responses)

*Action*

**No Change to the Plan**



**Representation(s)****3627 Mr B.O. Beynon [5011]****Object****Agent: Evans Banks Planning Limited (Richard Banks) [4967]****Summary:**

Allocated within the Carmarthenshire Unitary Development Plan (2003) and the Local Development Plan (2014). Not been subject of any detailed planning application, let alone market interest. It remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. Its retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. Reference is made to rep 3597 where the client's land is promoted.

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***Council's Initial Response***

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this allocation. It should be noted that the majority of the allocation is within the ownership of Carmarthenshire County Council.

Feedback attained from the landowner/developer (December 2020) confirms intent to deliver that part of the allocation in the Council's ownership in accordance with the Plan period.

This feedback outlines the following with regards the County Council's land: This part of the allocation has been through the Pre-Application Consultation (PAC) process during 2019 and an outline planning application for up to 202 units was validated on the 12th June 2020 (Planning application no. S/40692). The masterplan for this development is provided and further surveys and site information can be found within the documentation submitted as part of the planning application. It is also stated that part of the planning application site area, known as 'Y Waun', is included within the Council's New Build Programme. It is likely that the remainder of the planning application site area will be openly marketed for delivery by the private sector. Of note is the acknowledgment of Policy INF4 and that such matters are being considered as part of the Drainage Strategy for the application site, whilst it is also confirmed that it will be developed within the timescales set out in the Deposit plan's Housing Trajectory.

It should be noted that the Council has committed to completing a Statement of Common Ground (SCOG), whilst reference is also made to the fact that the planning application for this site has advanced and consultation has already been carried out with statutory consultees. Also, there is a commitment to provide a viability assessment in due course.

The Council also states that initial discussions have taken place with the adjoining landowner and their agent. It is stated that the masterplan of the Council site includes access points to the adjoining land and that further discussions to formalise access agreements will take place in due course.

Further to the above, it should be noted that feedback has also been received (November 2020) from the agent representing the owners of that parcel of the allocation which is not in the ownership of Carmarthenshire County Council. This feedback states that "on the basis that access to our site is maintained in conjunction with the local authority site and indeed that part is developed and suitably serviced, it is the intention to develop the site in accordance with the timescales set out in the Deposit plan's Housing Trajectory".

The feedback refers to delivery in the latter period of the Plan.

It is also stated that there are discussions with the adjoining landowner, being the



local authority, in respect of access arrangements between the respective parcels, but that there is confidence that an arrangement can be arrived at which will enable the allocation to be developed in its entirety. Of note also is the fact that the requirement of policy INF4 is acknowledged.

Sufficient evidence has been provided to prove the whole allocation is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

It is considered that based upon the above feedback, that the '3rd party' parcel of land (i.e. the land outside of the ownership of Carmarthenshire County Council) would be developed later in the Plan period.

This is a notable site for the settlement in terms of number of units. It should be noted however that there are a number of housing developments already under construction and / or completed within the settlement to date within the Plan period. Notable of which are PrC2/h3 (94 units), PrC2/h13 (29 units), Prc2/h18 (32 units), prc2/h19 (240 units initially) and prc2/h21 (34 units). To this end, the supply of housing across the plan period within the settlement is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.

(Cross referencing note - the Council's response to representation reference number 3597 can be viewed under the Council's HOM1 policy responses)

*Action*

No change to the Plan.



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*Representation(s)***3641 Mr & Mrs V & J Griffiths [555]****Object*****Agent: Evans Banks Planning Limited (Richard Banks) [4967]******Summary:***

Allocated within the Carmarthenshire Unitary Development Plan (2003) and the Local Development Plan (2014). Not been subject of any detailed planning application, let alone market interest. It remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. Its retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. Reference is made to reps 3621 and 3637 where the client's land is promoted.

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***Council's Initial Response***

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this allocation. It should be noted that the majority of the allocation is within the ownership of Carmarthenshire County Council.

Feedback attained from the landowner/developer (December 2020) confirms intent to deliver that part of the allocation in the Council's ownership in accordance with the Plan period.

This feedback outlines the following with regards the County Council's land: This part of the allocation has been through the Pre-Application Consultation (PAC) process during 2019 and an outline planning application for up to 202 units was validated on the 12th June 2020 (Planning application no. S/40692). The masterplan for this development is provided and further surveys and site information can be found within the documentation submitted as part of the planning application. It is also stated that part of the planning application site area, known as 'Y Waun', is included within the Council's New Build Programme. It is likely that the remainder of the planning application site area will be openly marketed for delivery by the private sector. Of note is the acknowledgment of Policy INF4 and that such matters are being considered as part of the Drainage Strategy for the application site, whilst it is also confirmed that it will be developed within the timescales set out in the Deposit plan's Housing Trajectory.

It should be noted that the Council has committed to completing a Statement of Common Ground (SCOG), whilst reference is also made to the fact that the planning application for this site has advanced and consultation has already been carried out with statutory consultees. Also, there is a commitment to provide a viability assessment in due course.

The Council also states that initial discussions have taken place with the adjoining landowner and their agent. It is stated that the masterplan of the Council site includes access points to the adjoining land and that further discussions to formalise access agreements will take place in due course.

Further to the above, it should be noted that feedback has also been received (November 2020) from the agent representing the owners of that parcel of the allocation which is not in the ownership of Carmarthenshire County Council. This feedback states that "on the basis that access to our site is maintained in conjunction with the local authority site and indeed that part is developed and suitably serviced, it is the intention to develop the site in accordance with the timescales set out in the Deposit plan's Housing Trajectory".

The feedback refers to delivery in the latter period of the Plan.

It is also stated that there are discussions with the adjoining landowner, being the

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local authority, in respect of access arrangements between the respective parcels, but that there is confidence that an arrangement can be arrived at which will enable the allocation to be developed in its entirety. Of note also is the fact that the requirement of policy INF4 is acknowledged.

Sufficient evidence has been provided to prove the whole allocation is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

It is considered that based upon the above feedback, that the '3rd party' parcel of land (i.e. the land outside of the ownership of Carmarthenshire County Council) would be developed later in the Plan period.

This is a notable site for the settlement in terms of number of units. It should be noted however that there are a number of housing developments already under construction and / or completed within the settlement to date within the Plan period. Notable of which are PrC2/h3 (94 units), PrC2/h13 (29 units), Prc2/h18 (32 units), prc2/h19 (240 units initially) and prc2/h21 (34 units). To this end, the supply of housing across the plan period within the settlement is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.

(Cross referencing note - the Council's response to representation reference numbers 3621 and 3637 can be viewed under the Council's HOM1 policy responses)

*Action*

No change to the Plan.



**Representation(s)****4099 Mr & Mrs K & T Jones [4052]****Object****Agent: Evans Banks Planning Limited (Richard Banks) [4967]****Summary:**

Allocated within the Carmarthenshire Unitary Development Plan (2003) and the Local Development Plan (2014). Not been subject of any detailed planning application, let alone market interest. It remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. Its retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. Reference is made to rep 4096 where the client's land is promoted.

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***Council's Initial Response***

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the delivery of this allocation. It should be noted that the majority of the allocation is within the ownership of Carmarthenshire County Council.**

**Feedback attained from the landowner/developer (December 2020) confirms intent to deliver that part of the allocation in the Council's ownership in accordance with the Plan period.**

**This feedback outlines the following with regards the County Council's land: This part of the allocation has been through the Pre-Application Consultation (PAC) process during 2019 and an outline planning application for up to 202 units was validated on the 12th June 2020 (Planning application no. S/40692). The masterplan for this development is provided and further surveys and site information can be found within the documentation submitted as part of the planning application. It is also stated that part of the planning application site area, known as 'Y Waun', is included within the Council's New Build Programme. It is likely that the remainder of the planning application site area will be openly marketed for delivery by the private sector. Of note is the acknowledgment of Policy INF4 and that such matters are being considered as part of the Drainage Strategy for the application site, whilst it is also confirmed that it will be developed within the timescales set out in the Deposit plan's Housing Trajectory.**

**It should be noted that the Council has committed to completing a Statement of Common Ground (SCOG), whilst reference is also made to the fact that the planning application for this site has advanced and consultation has already been carried out with statutory consultees. Also, there is a commitment to provide a viability assessment in due course.**

**The Council also states that initial discussions have taken place with the adjoining landowner and their agent. It is stated that the masterplan of the Council site includes access points to the adjoining land and that further discussions to formalise access agreements will take place in due course.**

**Further to the above, it should be noted that feedback has also been received (November 2020) from the agent representing the owners of that parcel of the allocation which is not in the ownership of Carmarthenshire County Council. This feedback states that "on the basis that access to our site is maintained in conjunction with the local authority site and indeed that part is developed and suitably serviced, it is the intention to develop the site in accordance with the timescales set out in the Deposit plan's Housing Trajectory".**

**The feedback refers to delivery in the latter period of the Plan.**

**It is also stated that there are discussions with the adjoining landowner, being the**

local authority, in respect of access arrangements between the respective parcels, but that there is confidence that an arrangement can be arrived at which will enable the allocation to be developed in its entirety. Of note also is the fact that the requirement of policy INF4 is acknowledged.

Sufficient evidence has been provided to prove the whole allocation is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

It is considered that based upon the above feedback, that the '3rd party' parcel of land (i.e. the land outside of the ownership of Carmarthenshire County Council) would be developed later in the Plan period.

This is a notable site for the settlement in terms of number of units. It should be noted however that there are a number of housing developments already under construction and / or completed within the settlement to date within the Plan period. Notable of which are PrC2/h3 (94 units), PrC2/h13 (29 units), Prc2/h18 (32 units), prc2/h19 (240 units initially) and prc2/h21 (34 units). To this end, the supply of housing across the plan period within the settlement is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.

(Cross referencing note - the Council's response to representation reference number 4096 can be viewed under the Council's HOM1 policy responses)

*Action*

No change to the Plan.



**Representation(s)****4121 Mr B.O. Beynon [5011]****Object****Agent: Evans Banks Planning Limited (Richard Banks) [4967]****Summary:**

Allocated within the Carmarthenshire Unitary Development Plan (2003) and the Local Development Plan (2014). Not been subject of any detailed planning application, let alone market interest. It remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. Its retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. Reference is made to rep 4118 where the client's land is promoted.

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***Council's Initial Response***

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the delivery of this allocation. It should be noted that the majority of the allocation is within the ownership of Carmarthenshire County Council.**

**Feedback attained from the landowner/developer (December 2020) confirms intent to deliver that part of the allocation in the Council's ownership in accordance with the Plan period.**

**This feedback outlines the following with regards the County Council's land: This part of the allocation has been through the Pre-Application Consultation (PAC) process during 2019 and an outline planning application for up to 202 units was validated on the 12th June 2020 (Planning application no. S/40692). The masterplan for this development is provided and further surveys and site information can be found within the documentation submitted as part of the planning application. It is also stated that part of the planning application site area, known as 'Y Waun', is included within the Council's New Build Programme. It is likely that the remainder of the planning application site area will be openly marketed for delivery by the private sector. Of note is the acknowledgment of Policy INF4 and that such matters are being considered as part of the Drainage Strategy for the application site, whilst it is also confirmed that it will be developed within the timescales set out in the Deposit plan's Housing Trajectory.**

**It should be noted that the Council has committed to completing a Statement of Common Ground (SCOG), whilst reference is also made to the fact that the planning application for this site has advanced and consultation has already been carried out with statutory consultees. Also, there is a commitment to provide a viability assessment in due course.**

**The Council also states that initial discussions have taken place with the adjoining landowner and their agent. It is stated that the masterplan of the Council site includes access points to the adjoining land and that further discussions to formalise access agreements will take place in due course.**

**Further to the above, it should be noted that feedback has also been received (November 2020) from the agent representing the owners of that parcel of the allocation which is not in the ownership of Carmarthenshire County Council. This feedback states that "on the basis that access to our site is maintained in conjunction with the local authority site and indeed that part is developed and suitably serviced, it is the intention to develop the site in accordance with the timescales set out in the Deposit plan's Housing Trajectory".**

**The feedback refers to delivery in the latter period of the Plan.**

**It is also stated that there are discussions with the adjoining landowner, being the**

local authority, in respect of access arrangements between the respective parcels, but that there is confidence that an arrangement can be arrived at which will enable the allocation to be developed in its entirety. Of note also is the fact that the requirement of policy INF4 is acknowledged.

Sufficient evidence has been provided to prove the whole allocation is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

It is considered that based upon the above feedback, that the '3rd party' parcel of land (i.e. the land outside of the ownership of Carmarthenshire County Council) would be developed later in the Plan period.

This is a notable site for the settlement in terms of number of units. It should be noted however that there are a number of housing developments already under construction and / or completed within the settlement to date within the Plan period. Notable of which are PrC2/h3 (94 units), PrC2/h13 (29 units), Prc2/h18 (32 units), prc2/h19 (240 units initially) and prc2/h21 (34 units). To this end, the supply of housing across the plan period within the settlement is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.

(Cross referencing note - the Council's response to representation reference number 4118 can be viewed under the Council's HOM1 policy responses)

*Action*

No change to the Plan.



***Representation(s)*****3303 Barratt David Wilson Homes (Mrs Francesca Evans) [4879]****Object*****Summary:***

BDW Homes objects to the allocation of this site. It comprises an existing allocation within the adopted LDP which is proposed to be 'rolled' forward by Carmarthenshire County Council. There is no evidenced justification for the continued allocation of this site, given that no progress has been made since its first allocation in 2014. The delivery of this site has been pushed back a year in every JHLAS since at least 2017 which confirms the lack of progress and deliverability of this site.

This site should be removed as a draft allocation from the Deposit Revised LDP.

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***Council's Initial Response***

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this allocation. It should be noted that the majority of the allocation is within the ownership of Carmarthenshire County Council.

Feedback attained from the landowner/developer (December 2020) confirms intent to deliver that part of the allocation in the Council's ownership in accordance with the Plan period.

This feedback outlines the following with regards the County Council's land: This part of the allocation has been through the Pre-Application Consultation (PAC) process during 2019 and an outline planning application for up to 202 units was validated on the 12th June 2020 (Planning application no. S/40692). The masterplan for this development is provided and further surveys and site information can be found within the documentation submitted as part of the planning application. It is also stated that part of the planning application site area, known as 'Y Waun', is included within the Council's New Build Programme. It is likely that the remainder of the planning application site area will be openly marketed for delivery by the private sector. Of note is the acknowledgment of Policy INF4 and that such matters are being considered as part of the Drainage Strategy for the application site, whilst it is also confirmed that it will be developed within the timescales set out in the Deposit plan's Housing Trajectory.

It should be noted that the Council has committed to completing a Statement of Common Ground (SCOG), whilst reference is also made to the fact that the planning application for this site has advanced and consultation has already been carried out with statutory consultees. Also, there is a commitment to provide a viability assessment in due course.

The Council also states that initial discussions have taken place with the adjoining landowner and their agent. It is stated that the masterplan of the Council site includes access points to the adjoining land and that further discussions to formalise access agreements will take place in due course.

Further to the above, it should be noted that feedback has also been received (November 2020) from the agent representing the owners of that parcel of the allocation which is not in the ownership of Carmarthenshire County Council. This feedback states that "on the basis that access to our site is maintained in conjunction with the local authority site and indeed that part is developed and suitably serviced, it is the intention to develop the site in accordance with the timescales set out in the Deposit plan's Housing Trajectory".

The feedback refers to delivery in the latter period of the Plan.

It is also stated that there are discussions with the adjoining landowner, being the

local authority, in respect of access arrangements between the respective parcels, but that there is confidence that an arrangement can be arrived at which will enable the allocation to be developed in its entirety. Of note also is the fact that the requirement of policy INF4 is acknowledged.

Sufficient evidence has been provided to prove the whole allocation is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

It is considered that based upon the above feedback, that the '3rd party' parcel of land (i.e. the land outside of the ownership of Carmarthenshire County Council) would be developed later in the Plan period.

This is a notable site for the settlement in terms of number of units. It should be noted however that there are a number of housing developments already under construction and / or completed within the settlement to date within the Plan period. Notable of which are PrC2/h3 (94 units), PrC2/h13 (29 units), Prc2/h18 (32 units), prc2/h19 (240 units initially) and prc2/h21 (34 units). To this end, the supply of housing across the plan period within the settlement is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.

As a cross reference note - the respondent's site is promoted under representation reference number 3376. The Council's response to this can be viewed under the Council's HOM1 policy responses.

*Action*

**No change to the Plan.**



**Representation(s)****3925 Evans Banks Planning Limited (Richard Banks) [4967]****Object****Summary:**

Allocated within the Carmarthenshire Unitary Development Plan (2003) and the Local Development Plan (2014). Not been subject of any detailed planning application, let alone market interest. It remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. The site's retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. We therefore object to the proposed allocation, as its inclusion within the Plan fails the tests of soundness

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***Council's Initial Response***

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the delivery of this allocation. It should be noted that the majority of the allocation is within the ownership of Carmarthenshire County Council.**

**Feedback attained from the landowner/developer (December 2020) confirms intent to deliver that part of the allocation in the Council's ownership in accordance with the Plan period.**

**This feedback outlines the following with regards the County Council's land: This part of the allocation has been through the Pre-Application Consultation (PAC) process during 2019 and an outline planning application for up to 202 units was validated on the 12th June 2020 (Planning application no. S/40692). The masterplan for this development is provided and further surveys and site information can be found within the documentation submitted as part of the planning application. It is also stated that part of the planning application site area, known as 'Y Waun', is included within the Council's New Build Programme. It is likely that the remainder of the planning application site area will be openly marketed for delivery by the private sector. Of note is the acknowledgment of Policy INF4 and that such matters are being considered as part of the Drainage Strategy for the application site, whilst it is also confirmed that it will be developed within the timescales set out in the Deposit plan's Housing Trajectory.**

**It should be noted that the Council has committed to completing a Statement of Common Ground (SCOG), whilst reference is also made to the fact that the planning application for this site has advanced and consultation has already been carried out with statutory consultees. Also, there is a commitment to provide a viability assessment in due course.**

**The Council also states that initial discussions have taken place with the adjoining landowner and their agent. It is stated that the masterplan of the Council site includes access points to the adjoining land and that further discussions to formalise access agreements will take place in due course.**

**Further to the above, it should be noted that feedback has also been received (November 2020) from the agent representing the owners of that parcel of the allocation which is not in the ownership of Carmarthenshire County Council. This feedback states that "on the basis that access to our site is maintained in conjunction with the local authority site and indeed that part is developed and suitably serviced, it is the intention to develop the site in accordance with the timescales set out in the Deposit plan's Housing Trajectory".**

**The feedback refers to delivery in the latter period of the Plan.**

**It is also stated that there are discussions with the adjoining landowner, being the**

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local authority, in respect of access arrangements between the respective parcels, but that there is confidence that an arrangement can be arrived at which will enable the allocation to be developed in its entirety. Of note also is the fact that the requirement of policy INF4 is acknowledged.

Sufficient evidence has been provided to prove the whole allocation is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

It is considered that based upon the above feedback, that the '3rd party' parcel of land (i.e. the land outside of the ownership of Carmarthenshire County Council) would be developed later in the Plan period.

This is a notable site for the settlement in terms of number of units. It should be noted however that there are a number of housing developments already under construction and / or completed within the settlement to date within the Plan period. Notable of which are PrC2/h3 (94 units), PrC2/h13 (29 units), Prc2/h18 (32 units), prc2/h19 (240 units initially) and prc2/h21 (34 units). To this end, the supply of housing across the plan period within the settlement is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.

*Action*

**No change to the Plan.**





**Paragraph HOM1: Housing Allocations, PrC2/h23**

*Representation(s)*

**3380 Mr C Hurley [4688]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Allocated within the Carmarthenshire Unitary Development Plan (2003) and the Local Development Plan (2014). Not been subject of any detailed planning application, let alone market interest. It remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. Its retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. The client's site is promoted under rep 4186.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3983. This can be found within the Council's responses to comments made in regards site prc2/h23 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation reference number 4186 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan**



*Representation(s)*

**3628 Mr B.O. Beynon [5011]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Allocated within the Carmarthenshire Unitary Development Plan (2003) and the Local Development Plan (2014). Not been subject of any detailed planning application, let alone market interest. It remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. Its retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. Reference is made to rep 3597 where the client's land is promoted.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3983. This can be found within the Council's responses to comments made in regards site prc2/h23 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation reference number 3597 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**



*Representation(s)*

**3642 Mr & Mrs V & J Griffiths [555]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Allocated within the Carmarthenshire Unitary Development Plan (2003) and the Local Development Plan (2014). Not been subject of any detailed planning application, let alone market interest. It remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. Its retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. Reference is made to reps 3621 and 3637 where the client's land is promoted.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3983. This can be found within the Council's responses to comments made in regards site prc2/h23 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation reference numbers 3621 and 3637 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**



*Representation(s)*

**4101 Mr & Mrs K & T Jones [4052]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Allocated within the Carmarthenshire Unitary Development Plan (2003) and the Local Development Plan (2014). Not been subject of any detailed planning application, let alone market interest. It remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. Its retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. Reference is made to rep 4096 where the client's land is promoted.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3983. This can be found within the Council's responses to comments made in regards site prc2/h23 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation reference number 4096 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**



*Representation(s)*

**4122 Mr B.O. Beynon [5011]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Allocated within the Carmarthenshire Unitary Development Plan (2003) and the Local Development Plan (2014). Not been subject of any detailed planning application, let alone market interest. It remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. Its retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. Reference is made to rep 4118 where the client's land is promoted.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3983. This can be found within the Council's responses to comments made in regards site prc2/h23 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation reference number 4118 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**



*Representation(s)*

**3917 Evans Banks Planning Limited (Richard Banks) [4967]**

**Object**

*Summary:*

Allocated within the Carmarthenshire Unitary Development Plan (2003) and the Local Development Plan (2014). Not been subject of any detailed planning application, let alone market interest. It remains undeveloped. The locality is riddled with historic coal mining activity, with low lying coal seams, together with multiple mine entries across the site. Clearly, any residential development will have to overcome ground remediation to stabilise the ground for residential foundations. The abnormal costs of which are likely to be significant, and hence present the development costs as leading to unviable and undeliverable sites. The site's retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. We therefore object to the proposed allocation, as its inclusion within the Plan fails the tests of soundness.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3983. This can be found within the Council's responses to comments made in regards site prc2/h23 - HOM1 - Housing Allocations.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3304 Barratt David Wilson Homes (Mrs Francesca Evans) [4879]**

**Object**

*Summary:*

Summary: The site is not deliverable during the plan period. It has a number of constraints, is not sustainable in terms of its location and it is not supported by a robust masterplan.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3983. This can be found within the Council's responses to comments made in regards site prc2/h23 - HOM1 - Housing Allocations.**

**As a cross reference note - the respondent's site is promoted under representation reference number 3376. The Council's response to this can be viewed under the Council's HOM1 policy responses.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4179 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-15 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3983. This can be found within the Council's responses to comments made in regards site prc2/h23 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation number 4143 can be found under the Council's response to representations made under policy sp3. The Council's response to representation number 4142 can be viewed under the Council's HOM1 policy responses).**

*Action*

**No change to the Plan.**





*Representation(s)*

**4305 Persimmon Homes West Wales (Stuart Phillips) [5154]**

**Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-15 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3983. This can be found within the Council's responses to comments made in regards site prc2/h23 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation number 4276 can be found under the Council's response to representations made under policy sp3. The Council's response to representation numbers 4272 and 4275 can be viewed under the Council's HOM1 policy responses).**

*Action*

**No change to the Plan.**



***Representation(s)*****3983 Persimmon Homes - West Wales (Mr Ryan Greaney) [4188]****Support*****Summary:***

In the process of preparing a Draft Planning application and proposing to embark on a Pre-Application Consultation (PAC) exercise during spring 2020, with the submission of a Full planning application to follow once the PAC exercise has been brought to an appropriate conclusion. A draft layout is appended. The Deposit Plan is supported in the context of the proposed allocation of this site for the construction of circa 150 dwellings and associated infrastructure. Wishes to work with Carmarthenshire County Council through the forthcoming Local Development Plan stages and would seek to agree a statement of common ground for submission to the appointed independent Planning Inspector.

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**Council's Initial Response**

**Comments noted/support welcomed.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the delivery of this site. Further feedback attained from the respondent (November 2020) confirms intent to deliver in accordance with the Plan period.**

**A Statement of Common Ground (SoCG) - emerging/draft - has been submitted and a commitment has been given to prepare a viability statement - this is ongoing.**

**Of note within the SoCG in regards Trajectory and Timescale is the following: "It is confirmed that this should not be considered as a 'stalled' site (given its allocated status in the current LDP) as Persimmon Homes West Wales is actively pursuing development and going through the process of demonstrating the deliverability of the site. The 150 homes identified in the Plan can be delivered in accordance with policy requirements during the Plan period. It is the intention to submit a planning application and the proposals are supported by a major house builder".**

**Also - the SoCG provides a timetable for delivery which accords with the Council's Site Trajectory Schedule included in Appendix 7 of the Deposit Plan.**

**(It is stated that this is considered accurate at the current time. It is dependent on the outcome of the planning application process).**

**The SoCG makes provision for the Site Layout to be appended.**

**Reference is made to the preparation of a Transport Assessment (TA), Preliminary Ecology Assessment, Tree Survey, and Topographical Survey. The content of the TA and Ecological Assessment are summarised.**

**It is stated that the scope of the TA has been informed through pre-application scoping discussions with CCC. A detailed review of the existing highway network and baseline situation has been carried out.**

**Note the SoCG has yet to signed / formally agreed by the Council.**

**Also, the viability information can be reviewed as appropriate.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP - however reference is made to the progress already made as per the above.**

**This is a notable site for the settlement in terms of number of units. It should be noted however that there are a number of housing developments already under construction and / or completed within the settlement to date within the Plan period. Notable of which are PrC2/h3 (94 units), PrC2/h13 (29 units), PrC2/h18 (32 units), prc2/h19 (240 units initially) and prc2/h21 (34 units). To this end, the supply of housing across the**

plan period within the settlement is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period

*Action*

No change to the Plan.

**Paragraph HOM1: Housing Allocations, PrC2/MU2**

*Representation(s)*

**4180 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 11-15 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142. The respondent has clarified that they are not objecting to the non-residential elements of the mixed use site.

*Council's Initial Response*

Reference should be made to the Council's response to representation reference number 3581. This response is under the Council's response to representations received in respect of Policy SG1 - site prc2/mu2.

(Cross referencing note - the Council's response to representation number 4143 can be found under the Council's response to representations made under policy sp3. The Council's response to representation number 4142 can be viewed under the Council's HOM1 policy responses).

*Action*

No change to the Plan as a result of this representation.

**Representation(s)**

**4306 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 11-15 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275. The respondent has clarified that they are not objecting to the non-residential elements of the mixed use site.

**Council's Initial Response**

**Reference should be made to the Council's response to representation reference number 3581. This response is under the Council's response to representations received in respect of Policy SG1 - site prc2/mu2.**

**(Cross referencing note - the Council's response to representation number 4276 can be found under the Council's response to representations made under policy sp3. The Council's response to representation numbers 4272 and 4275 can be viewed under the Council's HOM1 policy responses).**

**Action**

**No change to the Plan as a result of this representation.**



**Paragraph HOM1: Housing Allocations, SeC3/h1**

*Representation(s)*

**4181 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4308 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**The site has an outline planning permission which the land owner has stated they are looking to act upon.**

**Further evidential work will be provided at the examination in to the revised LDP.**

*Action*

**No change to the Plan**



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**Paragraph HOM1: Housing Allocations, SeC3/h2**

*Representation(s)*

**3387 Mr Philip George Bsc (Hons) Qs. Dip Con. [521]**

**Support**

*Summary:*

Support for housing allocation SeC3/h2. As the owner of site ref:SeC3/h2 (Site off Priory Street Kidwelly) I can confirm I have the resources to deliver and develop this site within the Local Development Plan period and will be happy to provide whatever information is required to satisfy officers this site can be delivered on time and within the Plan period.

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*Council's Initial Response*

**Support Welcomed. Further evidential work is being undertaken prior to the LDP examination.**

*Action*

**No change to the Plan**



**Paragraph HOM1: Housing Allocations, SeC3/h4**

*Representation(s)*

**4182 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4309 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**The site has outline permission, and further evidential work will be provided at the examination in to the revised LDP.**

*Action*

**No change to the Plan**





**Paragraph HOM1: Housing Allocations, SeC4/h2*****Representation(s)*****3381 Mr C Hurley [4688]****Object*****Agent: JCR Planning Ltd (Mr Craig Jones) [4665]******Summary:***

This has been marketed by the County Council for many years, and despite its coastal position, has failed to receive firm interest and any form of detailed planning application. Ground conditions require remediation of former historic uses. Consequently, at least seventeen years of Development Plan allocations have elapsed without any signs of wholesale delivery (commentary grouped with other sites Sec5/h2, SeC8/h2, SuV22/h1 which have also been lodged as objections). Clearly, there is no historic demand for sites of these scales in parts of the Llanelli, Trimsaran and Burry Port / Pembrey areas. All are certainly physically challenging sites, many of which have historic industrial or coal mining legacy issues, which may require significant abnormal costs to achieve developable areas for residential use. The client's site is promoted under rep 4186.

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**Council's Initial Response**

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the delivery of this site.**

**Feedback attained from the landowner/developer - Carmarthenshire County Council - in November 2020 confirms intent to deliver in accordance with the Plan period.**

**This feedback outlines the position on the site in terms of the planning permissions in place - outline/section 73 permissions S/30678, S/38251, S/30598 and S/38106 - and advises that supporting surveys and investigations can be found in the documentation submitted as part of these applications.**

**It is stated that 3rd party land which forms part of the allocation (known locally as the 'Grillo' site) was acquired by Carmarthenshire County Council in August 2020.**

**It is also stated that planning contributions have already been made for 'sites 5 and 6' whilst they are agreed for the 'Grillo' site. Together 'sites 5 and 6' and the 'Grillo' site make up the allocated area.**

**It is also stated that in regards associated planning consent S/30601 for the provision of infrastructure to serve housing development and the surrounding area, the works have commenced.**

**It is also stated that there are plans to release a Development Brief to market with a view to appointing a preferred developer in due course.**

**It is also stated that a scheme for betterment on the site has been identified and agreed at planning stage (note the landowner/developer confirms the provisions of policy INF4 are known and will be adhered to by the scheme).**

**It is also stated that the site will be developed in accordance with the dates set out in the Plan's Housing Trajectory.**

**It should be noted that the landowner/developer has also agreed to complete a Statement of Common Ground (SCOG) detailing timescales, funding, marketing, delivery and viability in regards this site ahead of the LDP Examination.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

**It is noted that the development is being progressed by the Llanelli Waterside Joint Venture who have a strong track record in progressing similar developments**

**This is a notable site for the settlement in terms of number of units. It should be noted however that there are a number of housing developments already under construction and / or completed within the Pembrey/Burry Port area to date within the Plan period. Notable of which are SeC4/h1 (105 units), SeC4/h3 (32 units) and Sec5/h1 (14 units). To this end, the supply of housing across the plan period within the vicinity is appropriate**

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**within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.**

**(Cross referencing note - the Council's response to representation reference number 4186 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan**



**Representation(s)****3629 Mr B.O. Beynon [5011]****Object****Agent: Evans Banks Planning Limited (Richard Banks) [4967]****Summary:**

This has been marketed by the County Council for many years, and despite its coastal position, has failed to receive firm interest and any form of detailed planning application. Ground conditions require remediation of former historic uses. Consequently, at least seventeen years of Development Plan allocations have elapsed without any signs of wholesale delivery (commentary grouped with other sites Sec5/h2, SeC8/h2, SuV22/h1 which have also been lodged as objections). Clearly, there is no historic demand for sites of these scales in parts of the Llanelli, Trimsaran and Burry Port / Pembrey areas. All are certainly physically challenging sites, many of which have historic industrial or coal mining legacy issues, which may require significant abnormal costs to achieve developable areas for residential use. Reference is made to rep 3597 where the client's land is promoted.

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**Council's Initial Response**

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the delivery of this site.**

**Feedback attained from the landowner/developer - Carmarthenshire County Council - in November 2020 confirms intent to deliver in accordance with the Plan period.**

**This feedback outlines the position on the site in terms of the planning permissions in place - outline/section 73 permissions S/30678, S/38251, S/30598 and S/38106 - and advises that supporting surveys and investigations can be found in the documentation submitted as part of these applications.**

**It is stated that 3rd party land which forms part of the allocation (known locally as the 'Grillo' site) was acquired by Carmarthenshire County Council in August 2020.**

**It is also stated that planning contributions have already been made for 'sites 5 and 6' whilst they are agreed for the 'Grillo' site. Together 'sites 5 and 6' and the 'Grillo' site make up the allocated area.**

**It is also stated that in regards associated planning consent S/30601 for the provision of infrastructure to serve housing development and the surrounding area, the works have commenced.**

**It is also stated that there are plans to release a Development Brief to market with a view to appointing a preferred developer in due course.**

**It is also stated that a scheme for betterment on the site has been identified and agreed at planning stage (note the landowner/developer confirms the provisions of policy INF4 are known and will be adhered to by the scheme).**

**It is also stated that the site will be developed in accordance with the dates set out in the Plan's Housing Trajectory.**

**It should be noted that the landowner/developer has also agreed to complete a Statement of Common Ground (SCOG) detailing timescales, funding, marketing, delivery and viability in regards this site ahead of the LDP Examination.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

**It is noted that the development is being progressed by the Llanelli Waterside Joint Venture who have a strong track record in progressing similar developments**

**This is a notable site for the settlement in terms of number of units. It should be noted however that there are a number of housing developments already under construction and / or completed within the Pembrey/Burry Port area to date within the Plan period. Notable of which are SeC4/h1 (105 units), SeC4/h3 (32 units) and Sec5/h1 (14 units). To this end, the supply of housing across the plan period within the vicinity is appropriate**

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**within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.**

**(Cross referencing note - the Council's response to representation reference number 3597 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**



**Representation(s)****3643 Mr & Mrs V & J Griffiths [555]****Object****Agent: Evans Banks Planning Limited (Richard Banks) [4967]****Summary:**

This has been marketed by the County Council for many years, and despite its coastal position, has failed to receive firm interest and any form of detailed planning application. Ground conditions require remediation of former historic uses. Consequently, at least seventeen years of Development Plan allocations have elapsed without any signs of wholesale delivery (commentary grouped with other sites Sec5/h2, SeC8/h2, SuV22/h1 which have also been lodged as objections). Clearly, there is no historic demand for sites of these scales in parts of the Llanelli, Trimsaran and Burry Port / Pembrey areas. All are certainly physically challenging sites, many of which have historic industrial or coal mining legacy issues, which may require significant abnormal costs to achieve developable areas for residential use. Reference is made to reps 3621 and 3637 where the client's land is promoted.

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**Council's Initial Response**

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the delivery of this site.**

**Feedback attained from the landowner/developer - Carmarthenshire County Council - in November 2020 confirms intent to deliver in accordance with the Plan period.**

**This feedback outlines the position on the site in terms of the planning permissions in place - outline/section 73 permissions S/30678, S/38251, S/30598 and S/38106 - and advises that supporting surveys and investigations can be found in the documentation submitted as part of these applications.**

**It is stated that 3rd party land which forms part of the allocation (known locally as the 'Grillo' site) was acquired by Carmarthenshire County Council in August 2020.**

**It is also stated that planning contributions have already been made for 'sites 5 and 6' whilst they are agreed for the 'Grillo' site. Together 'sites 5 and 6' and the 'Grillo' site make up the allocated area.**

**It is also stated that in regards associated planning consent S/30601 for the provision of infrastructure to serve housing development and the surrounding area, the works have commenced.**

**It is also stated that there are plans to release a Development Brief to market with a view to appointing a preferred developer in due course.**

**It is also stated that a scheme for betterment on the site has been identified and agreed at planning stage (note the landowner/developer confirms the provisions of policy INF4 are known and will be adhered to by the scheme).**

**It is also stated that the site will be developed in accordance with the dates set out in the Plan's Housing Trajectory.**

**It should be noted that the landowner/developer has also agreed to complete a Statement of Common Ground (SCOG) detailing timescales, funding, marketing, delivery and viability in regards this site ahead of the LDP Examination.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

**It is noted that the development is being progressed by the Llanelli Waterside Joint Venture who have a strong track record in progressing similar developments**

**This is a notable site for the settlement in terms of number of units. It should be noted however that there are a number of housing developments already under construction and / or completed within the Pembrey/Burry Port area to date within the Plan period. Notable of which are SeC4/h1 (105 units), SeC4/h3 (32 units) and Sec5/h1 (14 units). To this end, the supply of housing across the plan period within the vicinity is appropriate**



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**within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.**

**(Cross referencing note - the Council's response to representation reference numbers 3621 and 3637 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**



**Representation(s)****4102 Mr & Mrs K & T Jones [4052]****Object****Agent: Evans Banks Planning Limited (Richard Banks) [4967]****Summary:**

This has been marketed by the County Council for many years, and despite its coastal position, has failed to receive firm interest and any form of detailed planning application. Ground conditions require remediation of former historic uses. Consequently, at least seventeen years of Development Plan allocations have elapsed without any signs of wholesale delivery (commentary grouped with other sites Sec5/h2, SeC8/h2, SuV22/h1 which have also been registered as objections). Clearly, there is no historic demand for sites of these scales in parts of the Llanelli, Trimsaran and Burry Port / Pembrey areas. All are certainly physically challenging sites, many of which have historic industrial or coal mining legacy issues, which may require significant abnormal costs to achieve developable areas for residential use. Reference is made to rep 4096 where the client's land is promoted.

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*Council's Initial Response*

Comments noted.

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site. Feedback attained from the landowner/developer - Carmarthenshire County Council - in November 2020 confirms intent to deliver in accordance with the Plan period.

This feedback outlines the position on the site in terms of the planning permissions in place - outline/section 73 permissions S/30678, S/38251, S/30598 and S/38106 - and advises that supporting surveys and investigations can be found in the documentation submitted as part of these applications.

It is stated that 3rd party land which forms part of the allocation (known locally as the 'Grillo' site) was acquired by Carmarthenshire County Council in August 2020.

It is also stated that planning contributions have already been made for 'sites 5 and 6' whilst they are agreed for the 'Grillo' site. Together 'sites 5 and 6' and the 'Grillo' site make up the allocated area.

It is also stated that in regards associated planning consent S/30601 for the provision of infrastructure to serve housing development and the surrounding area, the works have commenced.

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It is also stated that a scheme for betterment on the site has been identified and agreed at planning stage (note the landowner/developer confirms the provisions of policy INF4 are known and will be adhered to by the scheme).

It is also stated that the site will be developed in accordance with the dates set out in the Plan's Housing Trajectory.

It should be noted that the landowner/developer has also agreed to complete a Statement of Common Ground (SCOG) detailing timescales, funding, marketing, delivery and viability in regards this site ahead of the LDP Examination.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

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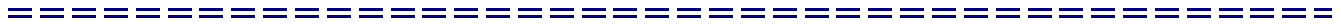
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**this end, the supply of housing across the plan period within the vicinity is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.**

**(Cross referencing note - the Council's response to representation reference number 4096 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**



**Representation(s)****4123 Mr B.O. Beynon [5011]****Object****Agent: Evans Banks Planning Limited (Richard Banks) [4967]****Summary:**

This has been marketed by the County Council for many years, and despite its coastal position, has failed to receive firm interest and any form of detailed planning application. Ground conditions require remediation of former historic uses. Consequently, at least seventeen years of Development Plan allocations have elapsed without any signs of wholesale delivery (commentary grouped with other sites Sec5/h2, SeC8/h2, SuV22/h1 which have also been lodged as objections). Clearly, there is no historic demand for sites of these scales in parts of the Llanelli, Trimsaran and Burry Port / Pembrey areas. All are certainly physically challenging sites, many of which have historic industrial or coal mining legacy issues, which may require significant abnormal costs to achieve developable areas for residential use. Reference is made to rep 4118 where the client's land is promoted.

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**Council's Initial Response**

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the delivery of this site.**

**Feedback attained from the landowner/developer - Carmarthenshire County Council - in November 2020 confirms intent to deliver in accordance with the Plan period.**

**This feedback outlines the position on the site in terms of the planning permissions in place - outline/section 73 permissions S/30678, S/38251, S/30598 and S/38106 - and advises that supporting surveys and investigations can be found in the documentation submitted as part of these applications.**

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**within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.**

**(Cross referencing note - the Council's response to representation reference number 4118 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**



**Representation(s)****3919 Evans Banks Planning Limited (Richard Banks) [4967]****Object****Summary:**

Site has been marketed by the County Council for many years, and despite its coastal position, has failed to receive firm interest and any form of detailed planning application. Ground conditions require remediation of former historic uses. It was also allocated with the Carmarthenshire Unitary Development Plan (2003), and LDP in 2014, and despite being allocated in Development Plan for over 17 years has not shown any signs of delivery. We submit that this site has showing no impetus to be developed and satisfy local housing need, and it should be omitted from the new LDP, and Alternative Site promoted and included in its place. The site's retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. We therefore object to the proposed allocation, as its inclusion within the Plan fails the tests of soundness.

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*Council's Initial Response*

Comments noted.

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The Council is confident in the delivery of this site. Feedback attained from the landowner/developer - Carmarthenshire County Council - in November 2020 confirms intent to deliver in accordance with the Plan period.

This feedback outlines the position on the site in terms of the planning permissions in place - outline/section 73 permissions S/30678, S/38251, S/30598 and S/38106 - and advises that supporting surveys and investigations can be found in the documentation submitted as part of these applications.

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It should be noted that the landowner/developer has also agreed to complete a Statement of Common Ground (SCOG) detailing timescales, funding, marketing, delivery and viability in regards this site ahead of the LDP Examination.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

It is noted that the development is being progressed by the Llanelli Waterside Joint Venture who have a strong track record in progressing similar developments

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**this end, the supply of housing across the plan period within the vicinity is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.**

*Action*

**No change to the Plan.**



**Representation(s)****4250 - RSAI - [4993]****Object****Agent: Lichfields (Mr Arwel Evans) [3166]****Summary:**

The initial outline application for this site was submitted in 2008 and outline permission was subsequently granted on 27 January 2016. However, to this date no development has come to fruition. We are aware that an extension of time was issued in December 2019 in order to extend the timescale for submission of reserved matters. However, prior to any development commencing a number of pre commencement conditions require discharging and reserved matters approval will be required. We are not aware that a developer is on board. This raises real questions about the delivery of the scheme. As a housing led regeneration site we consider that if the LPA wish to continue allocating this site then it should not be relied upon in the Council's housing land supply due to the uncertainty about delivery. We are also concerned about the SFCA's classification of the site as a high-risk flood area. It is especially concerning that a site that is to deliver 364 dwellings within the plan period is categorised as a 'high risk' flooding site by the SFCA. We question whether this approach meets PPW paragraph 6.6.22 which states that "planning authorities should adopt a precautionary approach of positive avoidance of development in areas of flooding from the sea or rivers." Reference is made to rep 4243 where the client's site is promoted.

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**Council's Initial Response**

**Comments noted.**

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**The Council is confident in the delivery of this site.**

**Feedback attained from the landowner/developer - Carmarthenshire County Council - in November 2020 confirms intent to deliver in accordance with the Plan period.**

**This feedback outlines the position on the site in terms of the planning permissions in place - outline/section 73 permissions S/30678, S/38251, S/30598 and S/38106 - and advises that supporting surveys and investigations can be found in the documentation submitted as part of these applications.**

**It is stated that 3rd party land which forms part of the allocation (known locally as the 'Grillo' site) was acquired by Carmarthenshire County Council in August 2020.**

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within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.

As a cross reference note - the respondent's site is promoted under representation reference number 4243. The Council's response to this can be viewed under the Council's HOM1 policy responses.

*Action*

No change to the Plan.

**Paragraph HOM1: Housing Allocations, Sec5/h1**

*Representation(s)*

4552 Mr Chris Carrott [2997]

Object

*Summary:*

The previous buildings on the site has caused damage to my house in Danlan Road with no resolution for it being fixed. This is an objection against the allocation of the site under Policy HOM1.

*Council's Initial Response*

**Comments noted**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The site is already completed within the Plan period and should therefore contribute to the housing supply.

*Action*

No change to the Plan

*Representation(s)*

**4183 Persimmon Homes West Wales (Stuart Phillips) [5154]**

**Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**Comments noted**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The site is already completed within the Plan period and should therefore contribute to the housing supply.**

**(Cross referencing note - the Council's response to representation number 4143 can be found under the Council's response to representations made under policy sp3. The Council's response to representation number 4142 can be viewed under the Council's HOM1 policy responses).**

*Action*

**No change to the Plan.**



*Representation(s)*

**4310 Persimmon Homes West Wales (Stuart Phillips) [5154]**

**Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**Comments noted**

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**The site is already completed within the Plan period and should therefore contribute to the housing supply.**

**(Cross referencing note - the Council's response to representation number 4276 can be found under the Council's response to representations made under policy sp3.**

**The Council's response to representation numbers 4272 and 4275 can be viewed under the Council's HOM1 policy responses).**

*Action*

**No change to the Plan**



**Paragraph HOM1: Housing Allocations, Sec5/h2**

*Representation(s)*

**3382 Mr C Hurley [4688]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Remains allocated for 100 dwellings, despite recently being refused planning permission by the Council's Planning Committee on highways, drainage and amenity grounds. That site was allocated in the 2003 UDP and 2014 LDP and has not shown any signs of implementation nor active delivery. Consequently, at least seventeen years of Development Plan allocations have elapsed without any signs of wholesale delivery (commentary grouped with other sites Sec4/h2, SeC8/h2, SuV22/h1 which have also been lodged as objections). Clearly, there is no historic demand for sites of these scales in parts of the Llanelli, Trimsaran and Burry Port / Pembrey areas. All are certainly physically challenging sites, many of which have historic industrial or coal mining legacy issues, which may require significant abnormal costs to achieve developable areas for residential use. The client's site is promoted under rep 4186.

*Council's Initial Response*

**Comments noted**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process detailed a site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3973. This can be found within the Council's responses to comments made in regards site Sec5/h2 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation reference number 4186 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**





*Representation(s)*

**3630 Mr B.O. Beynon [5011]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Remains allocated for 100 dwellings, despite recently being refused planning permission by the Council's Planning Committee on highways, drainage and amenity grounds. That site was allocated in the 2003 UDP and 2014 LDP and has not shown any signs of implementation nor active delivery. Consequently, at least seventeen years of Development Plan allocations have elapsed without any signs of wholesale delivery (commentary grouped with other sites Sec4/h2, SeC8/h2, SuV22/h1 which have also been lodged as objections). Clearly, there is no historic demand for sites of these scales in parts of the Llanelli, Trimsaran and Burry Port / Pembrey areas. All are certainly physically challenging sites, many of which have historic industrial or coal mining legacy issues, which may require significant abnormal costs to achieve developable areas for residential use. Reference is made to rep 3597 where the client's land is promoted.

*Council's Initial Response*

**Comments noted**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process detailed a site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3973. This can be found within the Council's responses to comments made in regards site Sec5/h2 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation reference number 3597 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**



*Representation(s)*

**3644 Mr & Mrs V & J Griffiths [555]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Remains allocated for 100 dwellings, despite recently being refused planning permission by the Council's Planning Committee on highways, drainage and amenity grounds. That site was allocated in the 2003 UDP and 2014 LDP and has not shown any signs of implementation nor active delivery. Consequently, at least seventeen years of Development Plan allocations have elapsed without any signs of wholesale delivery (commentary grouped with other sites Sec4/h2, SeC8/h2, SuV22/h1 which have also been lodged as objections). Clearly, there is no historic demand for sites of these scales in parts of the Llanelli, Trimsaran and Burry Port / Pembrey areas. All are certainly physically challenging sites, many of which have historic industrial or coal mining legacy issues, which may require significant abnormal costs to achieve developable areas for residential use. Reference is made to reps 3621 and 3637 where the client's land is promoted.

*Council's Initial Response*

**Comments noted**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process detailed a site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3973. This can be found within the Council's responses to comments made in regards site Sec5/h2 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation reference numbers 3621 and 3637 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**



*Representation(s)*

**4103 Mr & Mrs K & T Jones [4052]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Remains allocated for 100 dwellings, despite recently being refused planning permission by the Council's Planning Committee on highways, drainage and amenity grounds. That site was allocated in the 2003 UDP and 2014 LDP and has not shown any signs of implementation nor active delivery. Consequently, at least seventeen years of Development Plan allocations have elapsed without any signs of wholesale delivery (commentary grouped with other sites Sec4/h2, SeC8/h2, SuV22/h1 which have also been registered as objections). Clearly, there is no historic demand for sites of these scales in parts of the Llanelli, Trimsaran and Burry Port / Pembrey areas. All are certainly physically challenging sites, many of which have historic industrial or coal mining legacy issues, which may require significant abnormal costs to achieve developable areas for residential use. Reference is made to rep 4096 where the client's land is promoted.

*Council's Initial Response*

**Comments noted**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process detailed a site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3973. This can be found within the Council's responses to comments made in regards site Sec5/h2 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation reference number 4096 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**



*Representation(s)*

**4124 Mr B.O. Beynon [5011]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Remains allocated for 100 dwellings, despite recently being refused planning permission by the Council's Planning Committee on highways, drainage and amenity grounds. That site was allocated in the 2003 UDP and 2014 LDP and has not shown any signs of implementation nor active delivery. Consequently, at least seventeen years of Development Plan allocations have elapsed without any signs of wholesale delivery (commentary grouped with other sites Sec4/h2, SeC8/h2, SuV22/h1 which have also been lodged as objections). Clearly, there is no historic demand for sites of these scales in parts of the Llanelli, Trimsaran and Burry Port / Pembrey areas. All are certainly physically challenging sites, many of which have historic industrial or coal mining legacy issues, which may require significant abnormal costs to achieve developable areas for residential use. Reference is made to rep 4118 where the client's land is promoted.

*Council's Initial Response*

**Comments noted**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process detailed a site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3973. This can be found within the Council's responses to comments made in regards site Sec5/h2 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation reference number 4118 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**



**Representation(s)****4451 N/A (Elaine Morrisroe) [4677]****Object****Summary:**

I wish this following comment to be considered together with my original feedback given in March 2020. Since the closing date of the original consultation, residents of Pembrey have become aware that there are water voles living in the canal. We have photographic proof and Swansea University, together with volunteers from the village, will soon be carrying out a survey on the water voles living on the canal. They are one of the most endangered species in the UK at the moment, due to habitat loss and predation by the non-native American minx. The canal which cuts through the village will, if developers get their way, become used as a means of getting rid of excess run off water from the site and, no doubt too, foul water when the area floods, both of which will affect the delicate ecosystem that the water voles are currently able to survive in. This is another reason why I think the site should be withdrawn from the LDP.

**3271 Mr M Thomas [4899]****Object****Summary:**

This site has been turned down many times over the years both by Llanelli Borough Council and Carmarthenshire County Council, on the grounds of the traffic in this village. Therefore, why are they even thinking of building houses on this site? The traffic has more than doubled over the years and will only get worse from here on.

We are also losing too much of our green fields, trees and animal habitation (bats, dormice, lizards, badgers, foxes, squirrels, etc) in this village as it is.

Pembrey has a beautiful mountain for people to walk through and see these animals and the great view of our village, which will be ruined by the mass building of houses.

**3279 Julie Rowlands [4901]****Object****Summary:**

Object to the housing allocation at Cwrt Farm.

I live on the A484, in line with the LDP of land on Pembrey Mountain by Court Farm.

This road is the second busiest road in Carmarthenshire and has seen many accidents over the years, with the most recent one being only a few days ago. The junction coming onto this road is also very dangerous.

**4550 Mr Chris Carrott [2997]****Object****Summary:**

The site has already been rejected as part of the planning process by the council. This is an objection against the allocation of the site under Policy HOM1.

**3270 P Rowlands [4616]****Object***Summary:*

The land around the village of Pembrey at Court Farm/Mountain Road should be removed from the LDP.

Firstly, it is prime agricultural land and the two proposed roads to the site are unsafe for the traffic and pedestrians. Carmarthenshire Highways have told the proposed developer that the Mountain Road could not be used and were not allowed access to the site. On request, a site visit was paid to Garreglwyd by Carmarthenshire Planning Committee, and on their return to the Council Chambers, all voted against the other road at Garreglwyd being used to the site. The road was deemed unsuitable, and the junction to and off the main road of the A484 too dangerous. The outcome was refusal of full planning permission.

Also, to develop on this land the plans show the removal of many mature trees of all types which are homes to dormice and a vast number of other wild creatures.

**4461 Mr Michael Thomas [5249]****Object***Summary:*

I have previously sent many videos and photos to the council planning office and water defence regarding the flooding behind our properties from the surface water travelling down off the mountain. If the planning of these houses goes ahead, not only will our houses risk flooding, but the water will also travel downwards and flood even more houses in the village. People living here know more about this village than the people in planning department and living elsewhere do. When the people in this village speak up, the council needs to listen before they decide to give these big building firms the go-ahead and make things worse. Last week, just up the road from us, there was flooding outside the Goodig Hotel building site on the A484. I have attached photos to this email. This is exactly what we do not want to happen in our village as I am already concerned about the current level of flooding we experience at the back of our house and do not want this to get any worse since we are directly in front of the proposed housing site. This is an objection against allocation of site sec5/h2 under Policy HOM1.

**3394 Elaine Morrisroe [4964]****Object***Summary:*

Objection to the inclusion of housing allocation SeC5/h2 (Court Farm Pembrey):

Do we really need the number of houses that are proposed on this development?  
Apparently these houses are needed for people coming to the area to fill the now jobs. There are no new jobs.

Surely if the site were suitable for a development such as that proposed, it would have been given approval by the Council long ago.

The quality of the water in this stretch of the coastline has been an issue for a number of years and, should development go ahead, will likely continue to be an issue.

**3913 Evans Banks Planning Limited (Richard Banks) [4967]**

**Object**

*Summary:*

The site remains allocated despite recently being refused planning permission by the Council's Planning Committee on highways, drainage and amenity grounds. That site was allocated in the 2003 UDP and 2014 LDP and has not shown any signs of implementation nor active delivery. The site's retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. We therefore object to the proposed allocation, as its inclusion within the Plan fails the tests of soundness.

*Council's Initial Response*

**Comments noted**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process detailed a site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3973. This can be found within the Council's responses to comments made in regards site Sec5/h2 - HOM1 - Housing Allocations.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3307 Barratt David Wilson Homes (Mrs Francesca Evans) [4879] Object**

*Summary:*

Summary : the site is constrained, is not viable and is not deliverable within the plan period.

*Council's Initial Response*

**Comments noted**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process detailed a site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

Reference should be made to the Council's response to representation reference number 3973. This can be found within the Council's responses to comments made in regards site Sec5/h2 - HOM1 - Housing Allocations.

As a cross reference note - the respondent's site is promoted under representation reference number 3376. The Council's response to this can be viewed under the Council's HOM1 policy responses.

*Action*

**No change to the Plan.**

*Representation(s)*

**3196 Ms Pauline John [3815] Object**

*Summary:*

I strongly object to the site being included on the LDP list on the grounds that it has been included previously and all planning applications for this site have been refused. It is obviously not a suitable site for development and should therefore be taken off the map for local development plans.

*Council's Initial Response*

**Comments noted**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process detailed a site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

Reference should be made to the Council's response to representation reference number 3973. This can be found within the Council's responses to comments made in regards site Sec5/h2 - HOM1 - Housing Allocations.

*Action*

**No change to the Plan.**



*Representation(s)*

**4184 Persimmon Homes West Wales (Stuart Phillips) [5154]**

**Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process detailed a site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3973. This can be found within the Council's responses to comments made in regards site Sec5/h2 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation number 4143 can be found under the Council's response to representations made under policy sp3. The Council's response to representation number 4142 can be viewed under the Council's HOM1 policy responses).**

*Action*

**No change to the Plan.**



*Representation(s)*

**4311 Persimmon Homes West Wales (Stuart Phillips) [5154]**

**Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process detailed a site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3973. This can be found within the Council's responses to comments made in regards site Sec5/h2 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation number 4276 can be found under the Council's response to representations made under policy sp3. The Council's response to representation numbers 4272 and 4275 can be viewed under the Council's HOM1 policy responses).**

*Action*

**No change to the Plan.**



**Representation(s)****3973 Persimmon Homes - West Wales (Mr Ryan Greaney) [4188]****Support****Agent: Asbri Planning Ltd (Mr Keith Warren) [592]****Summary:**

The Deposit Revised Plan is supported on the basis that the Council have continued to maintain the housing land allocation, in spite of a refusal of a full planning application for the construction of 100 dwellings and associated works on 14th November 2019 (Ref S/21597). This was contrary to an officer recommendation to approve. Whilst the intention is to appeal the decision, in the meantime this submission seeks to demonstrate that the site is deliverable and in a future development provisions would be incorporated which would seek to ensure a high quality of design and layout, and which would also address site issues, including those cited as reasons for refusal. Would be pleased to agree a Statement of Common Ground to be presented to a future Inspector.

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***Council's Initial Response***

Comments noted/support welcomed.

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site. Further feedback attained from the respondent (November 2020) confirms intent to deliver in accordance with the Plan period.

A Statement of Common Ground (SoCG) - emerging/draft - has been submitted and a commitment has been given to prepare a viability statement - this is ongoing.

Of note within the SoCG in regards Trajectory and Timescale is the following: "It is confirmed that this should not be considered as a 'stalled' site (given its allocated status in the current LDP) as Persimmon Homes West Wales is actively pursuing development and going through the process of demonstrating the deliverability of the site. The 100 homes identified in the Plan can be delivered in accordance with policy requirements during the Plan period. The proposals are being taken through the planning process, albeit there is need to go through the appeal process, and are supported by a major house builder".

Also - the SoCG provides a timetable for delivery which accords with the Council's Site Trajectory Schedule included in Appendix 7 of the Deposit Plan.

(It is stated that this is considered accurate at the current time. It is dependent on the outcome of the appeal and the time taken for its determination).

The SoCG makes provision for a Site Layout to be appended.

Reference is made to the information also set out as part of the planning application S/21597 and responses from consultees.

Note the SoCG has yet to signed / formally agreed by the Council.

Also, the viability information can be reviewed as appropriate.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP - however note the work already undertaken as per the above.

The Council will monitor the position with regards the planning appeal.

This is a notable site for the settlement in terms of number of units. It should be noted however that there are a number of housing developments already under construction and / or completed within the Pembrey/Burry Port area to date within the Plan period. Notable of which are SeC4/h1 (105 units), SeC4/h3 (32 units) and Sec5/h1 (14 units). To this end, the supply of housing across the plan period within the vicinity is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.

***Action***

---

No change to the Plan.

**Paragraph HOM1: Housing Allocations, SeC6/h1**

*Representation(s)*

**3315 Llanedi Community Council (Mrs Ruth Taylor-Davies) [2943] Object**

*Summary:*

Following public consultation, a meeting of Llanedi Community Council Council agreed that we wish to object to all future large scale (5 plus houses) proposals for residential development in Hendy and Forest. Significant development has already taken place in recent years in the area. We are also concerned about the impact of future developments in Pontarddlais on our community.

Our specific objection to this candidate site also includes concerns over:

- \* impact upon traffic in the village
- \* impact on existing services (schools, surgeries, dentists etc.) and utilities/infrastructure (e.g. drainage)
- \* negative environmental impact

*Council's Initial Response*

**Comments noted. The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**This site has been delivered - part of it within the plan period. It will contribute to the overall housing supply.**

**For those comments relating to the wider settlement, reference should be made to the Council's response to representation number 4439 (policy sp16).**

*Action*

No change to the Plan.

**Representation(s)****4435 Mr & Mrs E Jones [2710]****Object****Summary:**

Rydym yn parhau i wrthwynebu unrhyw ddatblygiad pellach yn ardal Hendy / Fforest oherwydd twf sylweddol yr ardal dros y blynyddoedd diwethaf. Yn wir, gofynnwn i'r safleoedd hynny yn y Cynllun datblygu blaenorol gael eu dileu hefyd. Mae hyn yn wrthwynebiad i ddyraniad y Safle yn y Cynllun o dan bolisi HOM1.

We continue to object to any further development in the Hendy / Fforest area due to the significant growth of the area in recent years. Indeed we request that those sites in the previous development Plan be removed also. This is an objection to the allocation of the site in the Plan under policy HOM1.

**Council's Initial Response****Nodir y sylwadau.**

Mae dyraniad y safle yn y CDLI at ddibenion preswyl wedi cael ei ystyried yn llawn trwy'r fethodoleg asesu safleoedd. Fel rhan o'r broses asesu hon, paratowyd ffurflen safle. Ystyrir bod polisiau a chynigion y CDLI yn rhai cadarn y gellir eu cyflawni, o sylfaen dystiolaeth gadarn ac wedi'u llunio gan ystyried yr Arfarniad Cynaliadwyedd ac mewn modd sy'n gyson ag ef. Mae'r dyraniad yma a nodir yn y CDLI yn gwneud darpariaeth ddigonol ar gyfer rhan o anghenion tai y setliad hwn.

Mae'r safle wedi cael ei gyflawni - rhan ohono fe o fewn cyfnod y Cynllun. Fe fydd yn cyfrannu at y cyflenwad tai ehangach.

Am y sylwadau ehangach rheini yn ymwneud â Hendy/Fforest, dylid cyfeirio at ymateb y Cyngor at sylwad cyfeirnod rhif 4439 (polisi sp16).

**Comments Noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

This site has been delivered - part of it within the plan period. It will contribute to the overall housing supply.

For those wider comments relating to Hendy/Fforest, reference should be made to the Council's response to representation number 4439 (policy sp16).

**Action****Dim newid i'r Cynllun.****No change to the Plan.**

*Representation(s)*

**3128 April Jones [525] Support**

*Summary:*

Having reviewed the CCC deposit revised LDP 2018-2088 in relation to Hendy/Fforest area, I would like to say that I can support the plan as it stands with the following area:

SeC6/h1 - Adjacent Clos Ty Gwyn for 20 units only

**3181 Huw a Menna Watkins [2676] Support**

*Summary:*

SeC6/h1 - Adjacent Clos Ty Gwyn for 20 units only

Generally support the plan as it stands with the following areas included:

However, I would strongly like to register my opposition to the CCC LDP 2018-2033 if it is to include any additional areas of development as it would change the character of the area, and the village could become a bedroom community and hence lose its identity, which would go against SP12.

**3122 Norman Wilkinson [2602] Support**

*Summary:*

Area Hendy/Fforest

Having reviewed the CCC deposit revised LDP 2018-2088 in relation to Hendy/Fforest area, I would like to say that I can support the plan as it stands with the following:

SeC6/h1 - Adjacent Clos Ty Gwyn for 20 units only

**3213 Mr Mike Pugh [2379] Support**

*Summary:*

SeC6/h1 Adjacent Clos Ty Gwyn

Reluctantly agree with the current plan as it stands.

Strongly object to any further expansion to this draft proposal, and wish to be informed if this is the case.

*Council's Initial Response*

**Support welcomed**

*Action*

**No change to the Plan.**



**Representation(s)****4146 Dr Non Evans [3372]****Support****Summary:**

Ar ôl bwrw golwg dros gynllun CDLI diwygiedig 2018-2088 Cyngor Sir Gar mewn perthynas ag ardal yr Hendy/Fforest, hoffwn ddweud y gallaf gefnogi'r cynllun fel y saif gyda'r safleoedd canlynol yn cynnwys:

SeC6/H1 - gerllaw clos Tŷ Gwyn ar gyfer 20 uned yn unig

Pe byddai unrhyw safleoedd ychwanegol yn cael eu cynnwys yna byddai'n rhaid i mi wrthwynebu'n gryf CDLI arfaethedig 2018-2033 Cyngor Sir Gar gan na fyddai'r isadeiledd presennol yn gallu darparu'n effeithiol na chwaith ymdopi ar gyfer unrhyw ddatblygiadau ychwanegol. (Codir pryderon hefyd am yr iaith Gymraeg ynghyd â datblygiadau ar y gweill o fewn ardal Dinas a Sir Abertawe - Pontarddulais).

Having reviewed the CCC deposit revised LDP 2018-2088 in relation to Hendy/Fforest area, I would like to say that I can support the plan as it stands with the following:

SeC6/h1 - Adjacent Clos Ty Gwyn for 20 units only

If any additional areas were included, then I would have to strongly oppose Carmarthenshire County Council's proposed LDP 2018-2033 as the existing infrastructure would not be able to effectively provide for or cope with any additional developments. (Concerns also raised also with regards the Welsh language as well as planned development within the City and County of Swansea area - Pontarddulais).

**Council's Initial Response****Croesawir y gefnogaeth****Support welcomed****Action****Dim newid i'r Cynllun.****No change to the Plan.**

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**Paragraph HOM1: Housing Allocations, SeC6/h2**

*Representation(s)*

**3316 Llanedi Community Council (Mrs Ruth Taylor-Davies) [2943] Object**

*Summary:*

Following public consultation, a meeting of Llanedi Community Council Council on the 6th February 2018 agreed that we wish to object to all future large scale (5 plus houses) proposals for residential development in Hendy and Forest. Significant development has already taken place in recent years in the area. We are also concerned about the impact of future developments in Pontarddulais on our community.

Our specific objection to this candidate site also includes concerns over:

- \* impact upon traffic in the village
- \* impact on existing services (schools, surgeries, dentists etc.) and utilities/infrastructure (e.g. drainage)
- \* negative environmental impact

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3358. This can be found within the Council's responses to comments made in regards site sec6/h2 - HOM1 - Housing Allocations.**

**For those comments relating to the wider settlement, reference should be made to the Council's response to representation number 4439 (policy sp16).**

*Action*

**No change to the Plan.**



*Representation(s)*

**3334 Mr Chris Davies [2969]**

**Object**

*Summary:*

We consider the scale of this proposal to be an overdevelopment of the area and believe it will have a detrimental impact to the semi-rural nature of the surrounding area of Fforest as well as impacting ecological diversity. We request a reduction in scale and introduction of a 5m buffer strip to act as a wildlife corridor and mitigate against habitat loss, inline with Deposit Draft Policies PSD3 and PSD4 (both of which we fully support) as well as the The Wellbeing of Future Generations (Wales) Act 2015 and Environment (Wales) Act 2016.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

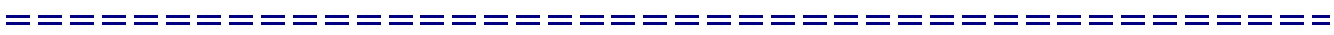
**In regards to the proposed 5m buffer proposed by the respondent, such matters would be for consideration as part of detailed design / planning application level deliberations as appropriate. As cited by the respondent, regard can be given to the policies of the Plan - notably policies PSD3 and PSD4. The support for these policies is noted but they have not been 'split off' as separate representations from this main representation as they are framed within an overall critique of this allocated site by the respondent.**

**With regards the proposed reduction in scale of the allocation and 5m buffer plan provided by the respondent - this has not been 'split off' as a separate site based representation from this main representation as it is framed within an overall critique of this allocated site. It is noted that the objection as submitted by the respondent is to allocation Sec6/h2 specifically.**

**Reference should be made to the Council's response to representation reference number 3358. This can be found within the Council's responses to comments made in regards site Sec6/h2 - HOM1 - Housing Allocations.**

*Action*

**No change to the Plan**



*Representation(s)*

4185 Persimmon Homes West Wales (Stuart Phillips) [5154]

Object

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3358. This can be found within the Council's responses to comments made in regards site sec6/h2 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation number 4143 can be found under the Council's response to representations made under policy sp3. The Council's response to representation number 4142 can be viewed under the Council's HOM1 policy responses).**

*Action*

**No change to the Plan.**



*Representation(s)*

**4312 Persimmon Homes West Wales (Stuart Phillips) [5154]**

**Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3358. This can be found within the Council's responses to comments made in regards site sec6/h2 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation number 4276 can be found under the Council's response to representations made under policy sp3. The Council's response to representation numbers 4272 and 4275 can be viewed under the Council's HOM1 policy responses).**

*Action*

**No change to the Plan.**



*Representation(s)*

**3914 Evans Banks Planning Limited (Richard Banks) [4967]**

**Object**

*Summary:*

The site remains undeveloped yet remains allocated. The site off Bronallt Road has the benefit of planning permission for 8 detached houses, of which only two have been constructed. The 8 dwellings form a phase immediately off an estate road junction with Bronallt Road, and the phase is restricted to the north-western part of the entire allocation of 39 units, which stretches south over steeply sloping and heavily undulating fields to the rear of Clayton Road. No planning permission has ever been sought for the majority of the site, despite the site being included in the Llanelli Borough Local Plan (1996), Carmarthenshire Unitary Development Plan (2003), and latterly the Local Development Plan (2014). The decision to retain Bronallt Road after a period of 25 years within the LDP is shown to be even more inconsistent, as it does not sit with LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. We therefore object to the proposed allocation, as its inclusion within the Plan fails the tests of soundness.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3358. This can be found within the Council's responses to comments made in regards site sec6/h2 - HOM1 - Housing Allocations.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4045 Mrs D Davies [4075]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

The continued allocation of this undeveloped site is unreasonable. It has the benefit of planning permission for 8 - only 2 constructed. The 8 dwellings form a phase immediately off an estate road junction with Bronallt Road, and the phase is restricted to the north-western part of the entire allocation of 39 units, which stretches south over steeply sloping and heavily undulating fields to the rear of Clayton Road. No planning permission has ever been sought for the majority of the site, despite the site being included in 3 development plans. Clearly, there is no historic demand for a site of this scale in this part of the Hendy area. It is almost certainly a physically challenging site, due to steep topography and the inability to adequately dispose of surface water, given there is no obvious watercourse receptor to deal with run-off from new development. The decision to retain it after a period of 25 years within the LDP is shown to be even more inconsistent, as it does not sit with LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. Reference is made to representation 4044 where the client's site is promoted.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3358. This can be found within the Council's responses to comments made in regards site sec6/h2 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation reference number 4044 can be viewed under the Council's HOM1 policy responses)**

*Action*

**No change to the Plan.**



**Representation(s)****4434 Mr & Mrs E Jones [2710]****Object****Summary:**

Cyfeirir at bryderon blaenorol a gyflwynwyd o ran cais cynllunio (rhan o'r ardal ddyrannu gyffredinol) - yn fwyaf nodedig o ran dŵr wyneb, nentydd a dŵr o dan ddaear - problemau hydrolegol. Er gwaethaf hyn, rhoddwyd caniatâd cynllunio. Cyflwynir lluo o ddeunyddiau (lluniau) o sut y mae materion wedi dod i'r amlwg a honnir bod yr adeilad wedi cael effaith na ellir ei gwrthdroi. Er gwaethaf hyn, dyrennir y safle. Mae'r tir yn serth - nid wyf am ddweud y bydd trychineb yn digwydd ond rwyf am i'm pryderon gael eu nodi (fel pobl eraill). Mae hyn yn wrthwynebiad i ddyraniad y safle yn y Cynllun o dan bolisi HOM1.

Rydym yn parhau i wrthwynebu cynnwys unrhyw ddatblygiadau cynllunio pellach yn ardaloedd Yr Hendy a'r Fforest o fewn y Cynllun Datblygu Lleol ar gyfer 2018-2033, a hynny oherwydd yr adeiladu sylweddol a fu dros y blynyddoedd diwethaf, ac sy'n dal i fod. Rydym o'r farn hefyd y dylid dileu'r ardaloedd i'w datblygu a glustnodwyd yn y CDLI blaenorol, yng nghydestun Yr Hendy a'r Fforest.

Hefyd pryderon ehangach yn cael ei godi ynglŷn ag ardal Hendy/Fforest - gweler sylwad 4439 o dan bolisi SP16.

Previous concerns made to a planning application (a part of the overall allocation area) referred to - most notably with regards surface water, streams and water underground - hydrological problems. In spite of this planning permission was given. A host of material is submitted (visuals) of how issues are manifesting themselves and it is claimed that the building has had an impact that cannot be reversed. In spite of this, the site is allocated. The land is steep - I do not want to say a disaster will happen but I want (as others have) my concerns to be noted. This is an objection to the allocation of the site in the Plan under policy HOM1.

We remain opposed to the inclusion of any further planning developments in Hendy and Fforest areas within the Local Development Plan for 2018-2033, due to the significant development that has taken place in recent years, and which continues to take place. We are also of the view that the areas for development identified in the previous LDP, in the context of Hendy and Fforest, should be removed.

Also wider concerns raised with regards the Hendy/Fforest area - see representation 4439 under policy SP16.

***Council's Initial Response***

**Nodir y sylwadau.**

Mae dyraniad y safle yn y CDLI at ddibenion preswyl wedi cael ei ystyried yn llawn trwy'r fethodoleg asesu safleoedd. Fel rhan o'r broses asesu hon, paratowyd ffurflen safle fanwl. Ystyrir bod polisïau a chynigion y CDLI yn rhai cadarn y gellir eu cyflawni, o sylfaen dystiolaeth gadarn ac wedi'u llunio gan ystyried yr Arfarniad Cynaliadwyedd ac mewn modd sy'n gyson ag ef. Mae'r dyraniad yma a nodir yn y CDLI yn gwneud darpariaeth ddigonol ar gyfer rhan o anghenion tai y setliad hwn.

Dylid cyfeirio at ymateb y Cyngor i sylwad rhif cyfeirnod 3358. Gellir ffeindio hwn o fewn ymatebion y Cyngor at sylwadau a wneir ynglyn â safle sec6/h2 - HOM1 - Dyraniadau Tai.

Am y sylwadau ehangach rheini yn ymwneud â Hendy/Fforest, dylid cyfeirio at ymateb y Cyngor at sylwad cyfeirnod rhif 4439 (polisi sp16).

**Comments Noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

Reference should be made to the Council's response to representation reference number 3358. This can be found within the Council's responses to comments made in regards site sec6/h2 - HOM1 - Housing Allocations.

For those wider comments relating to Hendy/Fforest , reference should be made to the Council's response to representation number 4439 (policy sp16).

***Action***

**Dim newid i'r Cynllun.**

**No change to the Plan.**





**Representation(s)**

**3182 Huw a Menna Watkins [2676] Support**

*Summary:*

SeC6/h2 - Land between Clayton Road and East of Bronallt Road for 39 units only

Generally support the plan as it stands

However, I would strongly like to register my opposition to the CCC LDP 2018-2033 if it is to include any additional areas of development as it would change the character of the area, and the village could become a bedroom community and hence lose its identity, which would go against SP12.

**3123 Norman Wilkinson [2602] Support**

*Summary:*

Having reviewed the CCC deposit revised LDP 2018-2088 in relation to Hendy/Fforest area, I would like to say that I can support the plan as it stands with the following:

SeC6/h2 - Land between Clayton Road and East of Bronallt Road for 39 units only

**3129 April Jones [525] Support**

*Summary:*

Having reviewed the CCC deposit revised LDP 2018-2088 in relation to Hendy/Fforest area, I would like to say that I can support the plan as it stands with the following area:

SeC6/h2 - Land between Clayton Road and East of Bronallt Road for 39 units only

**3214 Mr Mike Pugh [2379] Support**

*Summary:*

SeC6/h2 Land between Clayton Road and East of Bronallt Road

Reluctantly agree with the current plan as it stands.

Strongly object to any further expansion to this draft proposal, and wish to be informed if this is the case.

**Council's Initial Response**

**Support welcomed**

**Action**

**No change to the Plan**

***Representation(s)*****3358 N/A (Ben Davies) [4631]****Support*****Summary:***

We wish to support its continued allocation for residential development within the new LDP. Included within the submission are sustainability / site analysis documentation along with a current and potential future site plan. The submission is intended to demonstrate the deliverability of the site and support its continued allocation.

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***Council's Initial Response***

**Comments noted/support welcomed.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the delivery of this site.**

**Further feedback attained from the respondent (November 2020) confirms intent to deliver in accordance with the Plan period.**

**This further feedback consists of a report that has been written to address questions raised around the viability and deliverability of the site in line with the timescales set out within the deposit Revised LDP.**

**Of note within the November 2020 report is this text "When Greenway homes initially evaluated the site we commissioned our engineers to design a roadway that met the adoptable standards of Carmarthenshire County Council to ensure that the whole site was developable. The roadway, footpaths and all hard landscaped areas for the entire site were incorporated within a Drainage strategy report that was submitted as part of the Phase 1 planning application and signed off by CCC engineers. This ensured that the remaining land was accessible following on from phase 1 and that once completed the site would have no adverse effect on neighbouring properties".**

**Furthermore, the November 2020 report acknowledges that whilst the Revised LDP uses a high level viability appraisal to establish the affordable housing policy and provision level within a development site, attention should be drawn to the abnormal works and costs that development of this site will incur and indeed the fact that Greenway have invested heavily in the infrastructure necessary to develop the site as a whole.**

**Further to these comments, the Council does acknowledge the challenging nature of the site - notably topography and the investment required to deliver it. Also, the design approach will offer the opportunity to deliver a range and mix of housing types across cluster 2. It is noted that the November 2020 report highlights an approach to building individual houses with bespoke foundation systems for each plot.**

**The November 2020 report also provides some useful feedback on the built rates and trajectory, further to which the Council will amend the trajectory for this site (non committed element).**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP - however it is noted that much evidential work has already been completed (see above).**

This is a notable site for the settlement in terms of number of units. It should be noted however that there are a number of housing developments already under construction and / or completed within the Hendy area to date within the Plan period. Notable of which are SeC6/h1 (20 units in the plan period) and SeC6/h4 (35units). To this end, the supply of housing across the plan period within the settlement is appropriate within the early years of the trajectory, and this site will continue to make a contribution in due course, having already delivered an initial phase of units. This also leads to a natural phasing of development across the Plan period.

#### *Action*

**Amend the Plan (focused change) in that the housing trajectory for this site will be amended.**

#### *Representation(s)*

**4147 Dr Non Evans [3372]**

**Support**

#### *Summary:*

Ar ôl bwrw golwg dros gynllun CDLI diwygiedig 2018-2088 Cyngor Sir Gar mewn perthynas ag ardal yr Hendy/Fforest, hoffwn ddweud y gallaf gefnogi'r cynllun fel y saif gyda'r safleoedd canlynol yn cynnwys:

SeC6/H2-tir rhwng Heol Clayton a dwyrain o Heol Bronallt am 39 o unedau yn unig Pe byddai unrhyw safleoedd ychwanegol yn cael eu cynnwys yna byddai'n rhaid i mi wrthwynebu'n gryf CDLI arfaethedig 2018-2033 Cyngor Sir Gar gan na fyddai'r isadeiledd presennol yn gallu darparu'n effeithiol na chwaith ymdopi ar gyfer unrhyw ddatblygiadau ychwanegol. (Codir pryderon hefyd am yr iaith Gymraeg ynghyd â datblygiadau ar y gweill o fewn ardal Dinas a Sir Abertawe - Pontarddulais).

Having reviewed the CCC deposit revised LDP 2018-2088 in relation to Hendy/Fforest area, I would like to say that I can support the plan as it stands with the following:

SeC6 / H2- land between Clayton Road and situated east of Bronallt Road for 39 units only. If any additional areas were included, then I would have to strongly oppose Carmarthenshire County Council's proposed LDP 2018-2033 as the existing infrastructure would not be able to effectively provide for or cope with any additional developments. (Concerns also raised also with regards the Welsh language as well as planned development within the City and County of Swansea area - Pontarddulais).

#### *Council's Initial Response*

**Croesawir y gefnogaeth**

**Support welcomed**

#### *Action*

**Dim newid i'r Cynllun.**

**No change to the Plan.**

**Paragraph HOM1: Housing Allocations, SeC6/h3**

*Representation(s)*

**3317 Llanedi Community Council (Mrs Ruth Taylor-Davies) [2943]**

**Object**

*Summary:*

Following public consultation, a meeting of Llanedi Community Council Council agreed that we wish to object to all future large scale (5 plus houses) proposals for residential development in Hendy and Forest. Significant development has already taken place in recent years in the area. We are also concerned about the impact of future developments in Pontarddulais on our community.

Our specific objection to this candidate site also includes concerns over:

- \* impact upon traffic in the village
- \* impact on existing services (schools, surgeries, dentists etc.) and utilities/infrastructure (e.g. drainage)
- \* negative environmental impact

*Council's Initial Response*

**Comments noted. The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**There is firm evidence of deliverability on this site, including permissions issued / plots under construction and the Council wishes to ensure that the remaining units contribute to the overall housing supply within the plan period.**

**For those comments relating to the wider settlement, reference should be made to the Council's response to representation number 4439 (policy sp16).**

*Action*

**No change to the Plan.**



**Representation(s)****4436 Mr & Mrs E Jones [2710]****Object****Summary:**

Rydym yn parhau i wrthwynebu unrhyw ddatblygiad pellach yn ardal Hendy / Fforest oherwydd twf sylweddol yr ardal dros y blynyddoedd diwethaf. Yn wir, gofynnwn i'r safleoedd hynny yn y Cynllun datblygu blaenorol gael eu dileu hefyd. Mae hyn yn wrthwynebiad i ddyraniad y Safle yn y Cynllun o dan bolisi HOM1.

We continue to object to any further development in the Hendy / Fforest area due to the significant growth of the area in recent years. Indeed we request that those sites in the previous development Plan be removed also. This is an objection to the allocation of the site in the Plan under policy HOM1.

**Council's Initial Response****Nodir y sylwadau.**

Mae dyraniad y safle yn y CDLI at ddibenion preswyl wedi cael ei ystyried yn llawn trwy'r fethodoleg asesu safleoedd. Fel rhan o'r broses asesu hon, paratowyd ffurflen safle fanwl. Ystyrir bod polisiau a chynigion y CDLI yn rhai cadarn y gellir eu cyflawni, o sylfaen dystiolaeth gadarn ac wedi'u llunio gan ystyried yr Arfarniad Cynaliadwyedd ac mewn modd sy'n gyson ag ef. Mae'r dyraniad yma a nodir yn y CDLI yn gwneud darpariaeth ddigonol ar gyfer rhan o anghenion tai y setliad hwn.

Mae yna dystiolaeth gadarn o gyflenwad ar y safle yma, gan gynnwys caniataid yn cael ei rhoi / plotiau dan ddatblygiad ac y mae'r Cyngor am sicrhau fod yr unedau sydd ar ôl yn cyfrannu at y cyflenwad tai ehangach o fewn cyfnod y Cynllun.

Am y sylwadau ehangach rheini yn ymwneud â Hendy/Fforest, dylid cyfeirio at ymateb y Cyngor at sylwad cyfeirnod rhif 4439 (polisi sp16).

**Comments Noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

There is firm evidence of deliverability on this site, including permissions issued / plots under construction and the Council wishes to ensure that the remaining units contribute to the overall housing supply within the plan period.

For those wider comments relating to Hendy/Fforest, reference should be made to the Council's response to representation number 4439 (policy sp16).

**Action****Dim newid i'r Cynllun.****No change to the Plan.**

**Representation(s)****3124 Norman Wilkinson [2602]****Support****Summary:**

Having reviewed the CCC deposit revised LDP 2018-2088 in relation to Hendy/Fforest area, I would like to say that I can support the plan as it stands with the following area:

SeC6/h3 - Coed y Bronallt for 8 units only

**3183 Huw a Menna Watkins [2676]****Support****Summary:**

SeC6/h3 - Coed y Bronallt for 8 units only

Generally support the plan as it stands.

However, I would strongly like to register my opposition to the CCC LDP 2018-2033 if it is to include any additional areas of development as it would change the character of the area, and the village could become a bedroom community and hence lose its identity, which would go against SP12.

**3130 April Jones [525]****Support****Summary:**

Having reviewed the CCC deposit revised LDP 2018-2088 in relation to Hendy/Fforest area, I would like to say that I can support the plan as it stands with the following area:

SeC6/h3 - Coed y Bronallt for 8 units only

**3215 Mr Mike Pugh [2379]****Support****Summary:**

SeC6/h3 Coed y Bronallt

Reluctantly agree with the current plan as it stands.

Strongly object to any further expansion to this draft proposal, and wish to be informed if this is the case.

**Council's Initial Response****Support welcomed****Action****No change to the Plan.**

*Representation(s)*

**4148 Dr Non Evans [3372]**

**Support**

*Summary:*

Ar ôl bwrw golwg dros gynllun CDLI diwygiedig 2018-2088 Cyngor Sir Gar mewn perthynas ag ardal yr Hendy/Fforest, hoffwn ddweud y gallaf gefnogi'r cynllun fel y saif gyda'r safleoedd canlynol yn cynnwys:

SeC6/H3-coed y Bronallt ar gyfer 8 uned yn unig

Pe byddai unrhyw safleoedd ychwanegol yn cael eu cynnwys yna byddai'n rhaid i mi wrthwynebu'n gryf CDLI arfaethedig 2018-2033 Cyngor Sir Gar gan na fyddai'r isadeiledd presennol yn gallu darparu'n effeithiol na chwaith ymdopi ar gyfer unrhyw ddatblygiadau ychwanegol. (Codir pryderon hefyd am yr iaith Gymraeg ynghyd â datblygiadau ar y gweill o fewn ardal Dinas a Sir Abertawe - Pontarddulais).

Having reviewed the CCC deposit revised LDP 2018-2088 in relation to Hendy/Fforest area, I would like to say that I can support the plan as it stands with the following:

SeC6/H3-Coed y Bronallt for 8 units only

If any additional areas were included, then I would have to strongly oppose Carmarthenshire County Council's proposed LDP 2018-2033 as the existing infrastructure would not be able to effectively provide for or cope with any additional developments. (Concerns also raised also with regards the Welsh language as well as planned development within the City and County of Swansea area - Pontarddulais).

*Council's Initial Response*

**Croesawir y gefnogaeth**

**Support welcomed**

*Action*

**Dim newid i'r Cynllun.**

**No change to the Plan.**





**Paragraph HOM1: Housing Allocations, SeC6/h4**

*Representation(s)*

**3318 Llanedi Community Council (Mrs Ruth Taylor-Davies) [2943] Object**

*Summary:*

Following public consultation, a meeting of Llanedi Community Council Council agreed that we wish to object to all future large scale (5 plus houses) proposals for residential development in Hendy and Forest. Significant development has already taken place in recent years in the area. We are also concerned about the impact of future developments in Pontarddulais on our community.

Our specific objection to this candidate site also includes concerns over:

- \* impact upon traffic in the village
- \* impact on existing services (schools, surgeries, dentists etc.) and utilities/infrastructure (e.g. drainage)
- \* negative environmental impact

*Council's Initial Response*

**Comments noted. The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The site is under construction, deliverability is demonstrated. The site will contribute to the housing supply within the plan period.**

**For those comments relating to the wider settlement, reference should be made to the Council's response to representation number 4439 (policy sp16).**

*Action*

**No change to the Plan.**



**Representation(s)****4437 Mr & Mrs E Jones [2710]****Object****Summary:**

Rydym yn parhau i wrthwynebu unrhyw ddatblygiad pellach yn ardal Hendy / Fforest oherwydd twf sylweddol yr ardal dros y blynyddoedd diwethaf. Yn wir, gofynnwn i'r safleoedd hynny yn y Cynllun datblygu blaenorol gael eu dileu hefyd. Mae hyn yn wrthwynebiad i ddyraniad y Safle yn y Cynllun o dan bolisi HOM1.

We continue to object to any further development in the Hendy / Fforest area due to the significant growth of the area in recent years. Indeed we request that those sites in the previous development Plan be removed also. This is an objection to the allocation of the site in the Plan under policy HOM1.

**Council's Initial Response****Nodir y sylwadau.**

Mae dyraniad y safle yn y CDLI at ddibenion preswyl wedi cael ei ystyried yn llawn trwy'r fethodoleg asesu safleoedd. Fel rhan o'r broses asesu hon, paratowyd ffurflen safle fanwl. Ystyrir bod polisiau a chynigion y CDLI yn rhai cadarn y gellir eu cyflawni, o sylfaen dystiolaeth gadarn ac wedi'u llunio gan ystyried yr Arfarniad Cynaliadwyedd ac mewn modd sy'n gyson ag ef. Mae'r dyraniad yma a nodir yn y CDLI yn gwneud darpariaeth ddigonol ar gyfer rhan o anghenion tai y setliad hwn.

Mae'r safle yn cael ei ddatblygu, mae tystiolaeth o gyflenwad. Fe fydd y safle yn cyfrannau i'r cyflenwad tai o fewn cyfnod y Cynllun.

Am y sylwadau ehangach rheini yn ymwneud â Hendy/Fforest, dylid cyfeirio at ymateb y Cyngor at sylwad cyfeirnod rhif 4439 (polisi sp16).

**Comments Noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The site is under construction, deliverability is demonstrated. The site will contribute to the housing supply within the plan period.

For those wider comments relating to Hendy/Fforest, reference should be made to the Council's response to representation number 4439 (policy sp16).

**Action****Dim newid i'r Cynllun.****No change to the Plan.**

=====

*Representation(s)*

**3131 April Jones [525]**

**Support**

*Summary:*

Having reviewed the CCC deposit revised LDP 2018-2088 in relation to Hendy/Fforest area, I would like to say that I can support the plan as it stands with the following area:

SeC6/h4 - Adjacent to Clos Benallt Fawr, Fforest for 35 units only

**3184 Huw a Menna Watkins [2676]**

**Support**

*Summary:*

SeC6/h4 - Adjacent to Clos Benallt Fawr, Fforest for 35 units only

Generally support the plan as it stands

However, I would strongly like to register my opposition to the CCC LDP 2018-2033 if it is to include any additional areas of development as it would change the character of the area, and the village could become a bedroom community and hence lose its identity, which would go against SP12.

**3216 Mr Mike Pugh [2379]**

**Support**

*Summary:*

SeC6/h4 Adjacent to Clos Benallt Fawr, Fforest

Reluctantly agree with the current plan as it stands

Strongly object to any further expansion to this draft proposal, and wish to be informed if this is the case.

**3125 Norman Wilkinson [2602]**

**Support**

*Summary:*

Having reviewed the CCC deposit revised LDP 2018-2088 in relation to Hendy/Fforest area, I would like to say that I can support the plan as it stands with the following area:

SeC6/h4 - Adjacent to Clos Benallt Fawr, Fforest for 35 units only

*Council's Initial Response*

**Support welcomed**

*Action*

**No change to the Plan.**

**Representation(s)****4152 Dr Non Evans [3372]****Support****Summary:**

Ar ôl bwrw golwg dros gynllun CDLI diwygiedig 2018-2088 Cyngor Sir Gar mewn perthynas ag ardal yr Hendy/Fforest, hoffwn ddweud y gallaf gefnogi'r cynllun fel y saif gyda'r safleoedd canlynol yn cynnwys:

SeC6/H4-yn gyfagos i clos Benallt fawr, Fforest ar gyfer 35 o unedau yn unig  
Pe byddai unrhyw safleoedd ychwanegol yn cael eu cynnwys yna byddai'n rhaid i mi wrthwynebu'n gryf CDLI arfaethedig 2018-2033 Cyngor Sir Gar gan na fyddai'r isadeiledd presennol yn gallu darparu'n effeithiol na chwaith ymdopi ar gyfer unrhyw ddatblygiadau ychwanegol. (Codir pryderon hefyd am yr iaith Gymraeg ynghyd â datblygiadau ar y gweill o fewn ardal Dinas a Sir Abertawe - Pontarddulais).

Having reviewed the CCC deposit revised LDP 2018-2088 in relation to Hendy/Fforest area, I would like to say that I can support the plan as it stands with the following:

SeC6 / H4-adjacent to Benallt Fawr Close, Fforest for 35 units only

If any additional areas were included, then I would have to strongly oppose Carmarthenshire County Council's proposed LDP 2018-2033 as the existing infrastructure would not be able to effectively provide for or cope with any additional developments. (Concerns also raised also with regards the Welsh language as well as planned development within the City and County of Swansea area - Pontarddulais).

**Council's Initial Response****Croesawir y gefnogaeth****Support welcomed****Action****Dim newid i'r Cynllun.****No change to the Plan.****Representation(s)****4271 Persimmon Homes West Wales (Stuart Phillips) [5154]****Support****Agent:****WYG PLANNING & ENVIRONMENT (Louise Darch) [598]****Summary:**

Support is given for this site's allocation under policy HOM1. Planning permission relating for construction of 35 dwellings has been granted, development has commenced therefore clearly reinforcing the deliverability of this site.

**Council's Initial Response****Support welcomed.****Action****No change to the Plan.**

**Paragraph HOM1: Housing Allocations, SeC6/h5**

*Representation(s)*

**3319 Llanedi Community Council (Mrs Ruth Taylor-Davies) [2943]**

**Object**

*Summary:*

Following public consultation, a meeting of Llanedi Community Council Council agreed that we wish to object to all future large scale (5 plus houses) proposals for residential development in Hendy and Forest. Significant development has already taken place in recent years in the area. We are also concerned about the impact of future developments in Pontarddulais on our community.

Our specific objection to this candidate site also includes concerns over:

- \* impact upon traffic in the village
- \* impact on existing services (schools, surgeries, dentists etc.) and utilities/infrastructure (e.g. drainage)
- \* negative environmental impact

*Council's Initial Response*

**Comments noted.**

**Reference should be made to the Council's response to representation reference number 3345. This can be found within the Council's responses to comments made in regards site sec6/h5 - HOM1 - Housing Allocations.**

**For those comments relating to the wider settlement, reference should be made to the Council's response to representation number 4439 (policy sp16).**

*Action*

**No change to the Plan as a result of this representation alone - refer to the Council's response to representation reference number 3345.**



**Representation(s)**

**4188 Persimmon Homes West Wales (Stuart Phillips) [5154]**

**Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**Council's Initial Response**

**Comments noted.**

**Reference should be made to the Council's response to representation reference number 3345. This can be found within the Council's responses to comments made in regards site sec6/h5 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation number 4143 can be found under the Council's response to representations made under policy sp3. The Council's response to representation number 4142 can be viewed under the Council's HOM1 policy responses)**

**Action**

**No change to the Plan as a result of this representation alone - refer to the Council's response to representation reference number 3345.**



*Representation(s)*

**4313 Persimmon Homes West Wales (Stuart Phillips) [5154]**

**Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**Comments noted.**

**Reference should be made to the Council's response to representation reference number 3345. This can be found within the Council's responses to comments made in regards site sec6/h5 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation number 4276 can be found under the Council's response to representations made under policy sp3. The Council's response to representation numbers 4272 and 4275 can be viewed under the Council's HOM1 policy responses).**

*Action*

**No change to the Plan as a result of this representation alone - refer to the Council's response to representation reference number 3345.**



*Representation(s)*

**3915 Evans Banks Planning Limited (Richard Banks) [4967]**

**Object**

*Summary:*

The site remains undeveloped yet remains allocated. Planning permission has long since lapsed having been granted back in 2008 (S/17720 refers). Only outline planning permission was sought at that time, with an indicative site layout of 17 dwellings. This Agent has experience of investigating the site for potential developers. However, the land has been subject to extensive land raising, and tipping of waste, to the rear of the existing garage buildings. Consequently, there are ground stability issues, coupled with heavy contamination of the commercial site as a result of its garage past. As such, the costs of remediation are exhaustive, resulting in no viable scheme coming forward. Hence, we are confident that the site will not come forward and be developed for housing. The decision to retain Fforest Garage within the LDP is shown to be even more inconsistent, as it does not sit with LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. We therefore object to the proposed allocation, as its inclusion within the Plan fails the tests of soundness.

*Council's Initial Response*

**Comments noted.**

**Reference should be made to the Council's response to representation reference number 3345. This can be found within the Council's responses to comments made in regards site sec6/h5 - HOM1 - Housing Allocations.**

*Action*

**No change to the Plan as a result of this representation alone - refer to the Council's response to representation reference number 3345.**





*Representation(s)*

**4046 Mrs D Davies [4075]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

The continued allocation of this undeveloped site is unreasonable. Planning permission has long since lapsed having been granted back in 2008 (S/17720 refers). Only outline planning permission was sought at that time, with an indicative site layout of 17 dwellings. This Agent has experience of investigating the site for potential developers. However, the land has been subject to extensive land raising, and tipping of waste, to the rear of the existing garage buildings. Consequently, there are ground stability issues, coupled with heavy contamination of the commercial site as a result of its garage past. As such, the costs of remediation are exhaustive, resulting in no viable scheme coming forward. Hence, we are confident that the site will not come forward and be developed for housing. The decision to retain it after a period of 25 years within the LDP is shown to be even more inconsistent, as it does not sit with LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. Reference is made to representation 4044 where the client's site is promoted.

*Council's Initial Response*

**Comments noted.**

**Reference should be made to the Council's response to representation reference number 3345. This can be found within the Council's responses to comments made in regards site sec6/h5 - HOM1 - Housing Allocations.**

*Action*

**No change to the Plan as a result of this representation alone - refer to the Council's response to representation reference number 3345.**



**Representation(s)****4438 Mr & Mrs E Jones [2710]****Object****Summary:**

Rydym yn parhau i wrthwynebu unrhyw ddatblygiad pellach yn ardal Hendy / Fforest oherwydd twf sylweddol yr ardal dros y blynyddoedd diwethaf. Yn wir, gofynnwn i'r safleoedd hynny yn y Cynllun datblygu blaenorol gael eu dileu hefyd. Mae hyn yn wrthwynebiad i ddyraniad y Safle yn y Cynllun o dan bolisi HOM1.

We continue to object to any further development in the Hendy / Fforest area due to the significant growth of the area in recent years. Indeed we request that those sites in the previous development Plan be removed also. This is an objection to the allocation of the site in the Plan under policy HOM1.

**Council's Initial Response****Nodir y sylwadau.**

**Dylid cyfeirio at ymateb y Cyngor i sylwad rhif cyfeirnod 3345. Gellir ffeindio hwn o fewn ymatebion y Cyngor at sylwadau a wneir ynglyn â safle sec6/h5 - HOM1 - Dyraniadau Tai.**

**Am y sylwadau ehangach rheini yn ymwneud â Hendy/Fforest, dylid cyfeirio at ymateb y Cyngor at sylwad cyfeirnod rhif 4439 (polisi sp16).**

**Comments noted.**

**Reference should be made to the Council's response to representation reference number 3345. This can be found within the Council's responses to comments made in regards site sec6/h5 - HOM1 - Housing Allocations.**

**For those wider comments relating to Hendy/Fforest , reference should be made to the Council's response to representation number 4439 (policy sp16).**

**Action**

**Dim newid i'r Cynllun yn dilyn y sylwad yma yn unigol - cyfeiriwch at ymateb y Cyngor i sylwad rhif cyfeirnod 3345.**

**No change to the Plan as a result of this representation alone - refer to the Council's response to representation reference number 3345.**

=====

*Representation(s)*

**3217 Mr Mike Pugh [2379] Support**

*Summary:*

SeC6/h5 Fforest Garage

Reluctantly agree with the current plan as it stands

Strongly object to any further expansion to this draft proposal, and wish to be informed if this is the case.

**3132 April Jones [525] Support**

*Summary:*

Having reviewed the CCC deposit revised LDP 2018-2088 in relation to Hendy/Fforest area, I would like to say that I can support the plan as it stands with the following area:

SeC6/h5 - Fforest Garage for 17 units only

**3185 Huw a Menna Watkins [2676] Support**

*Summary:*

SeC6/h5 - Fforest Garage for 17 units only

Generally support the plan as it stands

However, I would strongly like to register my opposition to the CCC LDP 2018-2033 if it is to include any additional areas of development as it would change the character of the area, and the village could become a bedroom community and hence lose its identity, which would go against SP12.

**3126 Norman Wilkinson [2602] Support**

*Summary:*

Having reviewed the CCC deposit revised LDP 2018-2088 in relation to Hendy/Fforest area, I would like to say that I can support the plan as it stands with the following area:

SeC6/h5 - Fforest Garage for 17 units only

*Council's Initial Response*

**Comments noted.**

**Reference should be made to the Council's response to representation reference number 3345. This can be found within the Council's responses to comments made in regards site Sec6/h5 - HOM1 - Housing Allocations.**

*Action*

**No change to the Plan as a result of this representation alone - refer to the Council's response to representation reference number 3345.**

**Representation(s)****4153 Dr Non Evans [3372]****Support****Summary:**

Ar ôl bwrw golwg dros gynllun CDLI diwygiedig 2018-2088 Cyngor Sir Gar mewn perthynas ag ardal yr Hendy/Fforest, hoffwn ddweud y gallaf gefnogi'r cynllun fel y saif gyda'r safleoedd canlynol yn cynnwys:

SeC6/H5-Fforest Garage ar gyfer 17 Uned yn unig

Pe byddai unrhyw safleoedd ychwanegol yn cael eu cynnwys yna byddai'n rhaid i mi wrthwynebu'n gryf CDLI arfaethedig 2018-2033 Cyngor Sir Gar gan na fyddai'r isadeiledd presennol yn gallu darparu'n effeithiol na chwaith ymdopi ar gyfer unrhyw ddatblygiadau ychwanegol. (Codir pryderon hefyd am yr iaith Gymraeg ynghyd â datblygiadau ar y gweill o fewn ardal Dinas a Sir Abertawe - Pontarddulais).

Having reviewed the CCC deposit revised LDP 2018-2088 in relation to Hendy/Fforest area, I would like to say that I can support the plan as it stands with the following:

SeC6 / H5-Fforest Garage for 17 Units only

If any additional areas were included, then I would have to strongly oppose Carmarthenshire County Council's proposed LDP 2018-2033 as the existing infrastructure would not be able to effectively provide for or cope with any additional developments. (Concerns also raised also with regards the Welsh language as well as planned development within the City and County of Swansea area - Pontarddulais).

**Council's Initial Response**

**Nodir y sylwadau.**

**Dylid cyfeirio at ymateb y Cyngor i sylwad rhif cyfeirnod 3345. Gellir ffeindio hwn o fewn ymatebion y Cyngor at sylwadau a wneir ynglyn â safle sec6/h5 - HOM1 - Dyraniadau Tai.**

**Comments noted.**

**Reference should be made to the Council's response to representation reference number 3345. This can be found within the Council's responses to comments made in regards site sec6/h5 - HOM1 - Housing Allocations.**

**Action**

**Dim newid i'r Cynllun yn dilyn y sylwad yma yn unigol - cyfeiriwch at ymateb y Cyngor i sylwad rhif cyfeirnod 3345.**

**No change to the Plan as a result of this representation alone - refer to the Council's response to representation reference number 3345.**

*Representation(s)*

**3345 Ms Alex Franklin [3562]**

**Support**

*Summary:*

My husband and I own this brownfield site which at present is being rented and used as a carwash and garage business. We have retired and now live abroad, and believe that in the current economic climate the land would be better used for housing, especially as all services are already at site and the highways dept have agreed it in principle. We therefore, wish to proceed with the application for inclusion in the LDP and have recently been in touch with a planning advisor and spoken to a few local builders in a bid to move things forward.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes was subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma was prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal.**

**In noting the above, concerns have emerged post the publication of the deposit Plan in regards the deliverability of the site. Due to logistical difficulties, the landowner is unable to press ahead with bringing the site forward at the present time.**

**It is considered that the site should be de-allocated, however it will be left within development limits given its position within the urban form.**

**Suitable alternatives have been identified elsewhere in cluster 2 and are proposed as focused changes.**

*Action*

**Amend the Plan (focused change) to delete this housing allocation.**

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**Paragraph HOM1: Housing Allocations, SeC7/h1**

*Representation(s)*

**4189 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

**Summary:**  
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council has confidence in the delivery of this site. It is subject to the submission of a recent section 73 application and feedback from the planning application agent (October 2020) states that the Section 73 application is the first stage in the process of developing the site. The intention is to enter into a JV with a developer and the agent is in discussions with potential developers. It is stated that there is intent from the owner , with the owner realistic about land values.**

**There is consensus between the Council and the landowner/ developer regarding the Plan's Housing Trajectory.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

**(Cross referencing note - the Council's response to representation number 4143 can be found under the Council's response to representations made under policy sp3. The Council's response to representation number 4142 can be viewed under the Council's HOM1 policy responses).**

*Action*

**No change to the Plan.**



*Representation(s)*

**4314 Persimmon Homes West Wales (Stuart Phillips) [5154]**

**Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council has confidence in the delivery of this site. It is subject to the submission of a recent section 73 application and feedback from the planning application agent (October 2020) states that the Section 73 application is the first stage in the process of developing the site. The intention is to enter into a JV with a developer and the agent is in discussions with potential developers. It is stated that there is intent from the owner , with the owner realistic about land values.**

**There is consensus between the Council and the landowner/ developer regarding the Plan's Housing Trajectory.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

**(Cross referencing note - the Council's response to representation number 4276 can be found under the Council's response to representations made under policy sp3.**

**The Council's response to representation numbers 4272 and 4275 can be viewed under the Council's HOM1 policy responses).**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, SeC7/h2**

*Representation(s)*

**3324 Mrs Suzanne Davies [4933]**

**Object**

*Summary:*

An inspection has been undertaken behind our properties concerning an air shift with mine working. Also trees have been cut down and probably the remaining one will soon follow this will affect the habitat ie woodpeckers , birds ,bats. We have been treating knotweed for the passed 18 year it keeps coming back every year.

**3174 Mr Kenneth Grayson [4861]**

**Object**

*Summary:*

The surrounding area is already over-developed giving consideration to the limited infrastructure of the village.

The road design from 'Phase 2' of Aber Lluchwr to 'Phase 1' of Aber Lluchwr has created a dangerous corner as traffic approaches 1 Aber Lluchwr with cars speeding up to take a blind uphill corner.

This particular area is infested with knotweed and, according to the NCB, is the location of an air shaft from a very old coal mine.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**There is firm evidence of deliverability on this site, including permissions issued / plots under construction and the Council wishes to ensure that the remaining units contribute to the overall housing supply within the plan period.**

*Action*

**No change to the Plan.**





**Paragraph HOM1: Housing Allocations, SeC7/h3*****Representation(s)*****4190 Persimmon Homes West Wales (Stuart Phillips) [5154]****Object*****Agent:******WYG PLANNING & ENVIRONMENT (Louise Darch) [598]******Summary:***

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

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***Council's Initial Response***

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site.

Feedback attained from the landowner/developer (December 2020) confirms intent to deliver in accordance with the Plan period.

This feedback outlines the following:

Development of the site (note this is an allocation in the current/adopted LDP) was delayed due to investment being required at the Llangennech Dwr Cymru Welsh Water (DCWW) treatment works, however DCWW have confirmed that the works are underway and as such this is no longer an issue. The County Council's Housing Department have confirmed that they have a requirement for new build homes in Llangennech, under their delivery programme to provide 900 new council houses. The Council (landowner) is now in the process of selecting a planning consultant to prepare and submit an outline planning application for the site. A Highway Feasibility Study has been carried out and a Transport Statement will be prepared in due course. With regards to drainage, the appointed Planning Consultants will be consulting with the Council's Sustainable Drainage Approval Body (SAB) at an early stage to inform the Drainage Strategy. In terms of delivery, it is stated that the site will be delivered by the Council's Housing section, as part of the Council's New Build Programme. Furthermore, it is stated that the site will be developed within the timescales set out in the Deposit plan's Housing Trajectory.

It should be noted that the landowner/developer (i.e. the Council) has committed to completing a Statement of Common Ground (SCOG).

Also, a viability assessment will be provided in due course - once the proposed housing mix and masterplan have been finalised to inform the appraisal.

Also, there has been an effort to respond to concerns raised by Natural Resources Wales by the landowner/developer.

Reference should be made to the Council's response to representation reference number 3586 in this regard under its responses to comments received to site Sec7/h3 - HOM1 - Housing Allocations.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

This is a notable site for the settlement in terms of the number of residential units. It should be noted however that there are a number of housing developments already under construction and / or completed within the vicinity to date within the Plan period. Notable of which are Prc2/h18 (32 units), prc2/h19 (240 units initially) and prc2/h21 (34 units), as well as sites in Hendy. To this end, the supply of housing across the plan

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period within the vicinity is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.

(Cross referencing note - the Council's response to representation number 4143 can be found under the Council's response to representations made under policy sp3. The Council's response to representation number 4142 can be viewed under the Council's HOM1 policy responses).

*Action*

**No change to the Plan.**



**Representation(s)****4315 Persimmon Homes West Wales (Stuart Phillips) [5154]****Object****Agent:****WYG PLANNING & ENVIRONMENT (Louise Darch) [598]****Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

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***Council's Initial Response***

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site.

Feedback attained from the landowner/developer (December 2020) confirms intent to deliver in accordance with the Plan period.

This feedback outlines the following:

Development of the site (note this is an allocation in the current/adopted LDP) was delayed due to investment being required at the Llangennech Dwr Cymru Welsh Water (DCWW) treatment works, however DCWW have confirmed that the works are underway and as such this is no longer an issue. The County Council's Housing Department have confirmed that they have a requirement for new build homes in Llangennech, under their delivery programme to provide 900 new council houses. The Council (landowner) is now in the process of selecting a planning consultant to prepare and submit an outline planning application for the site. A Highway Feasibility Study has been carried out and a Transport Statement will be prepared in due course. With regards to drainage, the appointed Planning Consultants will be consulting with the Council's Sustainable Drainage Approval Body (SAB) at an early stage to inform the Drainage Strategy. In terms of delivery, it is stated that the site will be delivered by the Council's Housing section, as part of the Council's New Build Programme. Furthermore, it is stated that the site will be developed within the timescales set out in the Deposit plan's Housing Trajectory.

It should be noted that the landowner/developer (i.e. the Council) has committed to completing a Statement of Common Ground (SCOG).

Also, a viability assessment will be provided in due course - once the proposed housing mix and masterplan have been finalised to inform the appraisal.

Also, there has been an effort to respond to concerns raised by Natural Resources Wales by the landowner/developer.

Reference should be made to the Council's response to representation reference number 3586 in this regard under its responses to comments received to site Sec7/h3 - HOM1 - Housing Allocations.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

This is a notable site for the settlement in terms of the number of residential units. It should be noted however that there are a number of housing developments already under construction and / or completed within the vicinity to date within the Plan period. Notable of which are Prc2/h18 (32 units), prc2/h19 (240 units initially) and prc2/h21 (34 units), as well as sites in Hendy. To this end, the supply of housing across the plan

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period within the vicinity is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.

(Cross referencing note - the Council's response to representation number 4276 can be found under the Council's response to representations made under policy sp3. The Council's response to representation numbers 4272 and 4275 can be viewed under the Council's HOM1 policy responses).

*Action*

**No change to the Plan.**



**Representation(s)****4264 - RSAI - [4993]****Object****Agent: Lichfields (Mr Arwel Evans) [3166]****Summary:**

At a Medium risk of flooding according to the Council's SFCA. When considered with allocation SEC7/h4 (see rep 4265 against site sec7/h4), of 107 dwellings proposed for allocation in Llangennech, 85 of these have a medium flood risk and are adjacent to Zone B and Zone C2 as classified by the current TAN 15 maps. We question the suitability of the 'medium risk' sites, whether they will be able to meet the new TAN 15 justification test and ultimately whether they are deliverable. We consider this to be a concern given the recent devastating flooding in South Wales and the Welsh Government's aspiration of ensuring resilient developments (Well Being Goal as set out in the Well-being of Future Generations Act) that are not at risk of flooding. The consultation document on TAN15 seeks to direct development to Zone 1 (very low risk) and only to Zone 2 (low risk) if the development meets strict tests. We question whether it is appropriate to allocate sites within areas of flood risk when there are other suitable and sustainable sites in the same settlement that have a low risk of flooding. We consider that suitable sites that are of the very lowest flood risk should be allocated ahead of others that have a higher flood risk. Our client's site should be looked at positively in this regard - reference is made to the client's promotion representation number 4243.

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***Council's Initial Response***

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site.

Feedback attained from the landowner/developer (December 2020) confirms intent to deliver in accordance with the Plan period.

This feedback outlines the following:

Development of the site (note this is an allocation in the current/adopted LDP) was delayed due to investment being required at the Llangennech Dwr Cymru Welsh Water (DCWW) treatment works, however DCWW have confirmed that the works are underway and as such this is no longer an issue. The County Council's Housing Department have confirmed that they have a requirement for new build homes in Llangennech, under their delivery programme to provide 900 new council houses. The Council (landowner) is now in the process of selecting a planning consultant to prepare and submit an outline planning application for the site. A Highway Feasibility Study has been carried out and a Transport Statement will be prepared in due course. With regards to drainage, the appointed Planning Consultants will be consulting with the Council's Sustainable Drainage Approval Body (SAB) at an early stage to inform the Drainage Strategy. In terms of delivery, it is stated that the site will be delivered by the Council's Housing section, as part of the Council's New Build Programme. Furthermore, it is stated that the site will be developed within the timescales set out in the Deposit plan's Housing Trajectory.

It should be noted that the landowner/developer (i.e. the Council) has committed to completing a Statement of Common Ground (SCOG).

Also, a viability assessment will be provided in due course - once the proposed housing mix and masterplan have been finalised to inform the appraisal.

Also, there has been an effort to respond to concerns raised by Natural Resources Wales by the landowner/developer.

Reference should be made to the Council's response to representation reference number 3586 in this regard under its responses to comments received to site Sec7/h3 - HOM1 - Housing Allocations.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

This is a notable site for the settlement in terms of the number of residential units. It should be noted however that there are a number of housing developments already under construction and / or completed within the vicinity to date within the Plan period. Notable of which are Prc2/h18 (32 units), prc2/h19 (240 units initially) and prc2/h21 (34 units), as well as sites in Hendy. To this end, the supply of housing across the plan



period within the vicinity is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.

As a cross reference note - the respondent's site is promoted under representation reference number 4243. The Council's response to this can be viewed under the Council's HOM1 policy responses.

*Action*

**No change to the Plan.**

*Representation(s)*

**3586 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

Reservations regarding the allocation as it appears to provide important ecological connectivity features. Loss of ecosystem connectivity would be at odds with the fundamental aims of maintaining and enhancing biodiversity and Section 6, Part 1 of the Environment (Wales) Act 2016

*Council's Initial Response*

**In noting the concerns raised, the proponent / landowner has undertaken further work further to which Natural Resources Wales have confirmed in writing (November 2020) that there is a way forward.**

**In this regard, the site will be retained as an allocation and it is not proposed to remove the site as a focused change.**

*Action*

**No change to the Plan.**

***Representation(s)*****3396 Evans Banks Planning Limited (Richard Banks) [4967]****Object*****Summary:***

Objection to SeC7/h3 Golwg-yr-Afon, Llangennech

Twenty-five years of Development Plan allocations have elapsed without any signs of wholesale delivery of this site. Clearly, there is no historic demand for a site of this scale in this part of the Llangennech area. It is almost certainly a physically challenging site, covered in mature and dense vegetation, with mature trees along its entire eastern perimeter covered and protected by a large Tree Preservation Order.

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***Council's Initial Response***

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site.

Feedback attained from the landowner/developer (December 2020) confirms intent to deliver in accordance with the Plan period.

This feedback outlines the following:

Development of the site (note this is an allocation in the current/adopted LDP) was delayed due to investment being required at the Llangennech Dwr Cymru Welsh Water (DCWW) treatment works, however DCWW have confirmed that the works are underway and as such this is no longer an issue. The County Council's Housing Department have confirmed that they have a requirement for new build homes in Llangennech, under their delivery programme to provide 900 new council houses. The Council (landowner) is now in the process of selecting a planning consultant to prepare and submit an outline planning application for the site. A Highway Feasibility Study has been carried out and a Transport Statement will be prepared in due course. With regards to drainage, the appointed Planning Consultants will be consulting with the Council's Sustainable Drainage Approval Body (SAB) at an early stage to inform the Drainage Strategy. In terms of delivery, it is stated that the site will be delivered by the Council's Housing section, as part of the Council's New Build Programme. Furthermore, it is stated that the site will be developed within the timescales set out in the Deposit plan's Housing Trajectory.

It should be noted that the landowner/developer (i.e. the Council) has committed to completing a Statement of Common Ground (SCOG).

Also, a viability assessment will be provided in due course - once the proposed housing mix and masterplan have been finalised to inform the appraisal.

Also, there has been an effort to respond to concerns raised by Natural Resources Wales by the landowner/developer.

Reference should be made to the Council's response to representation reference number 3586 in this regard under its responses to comments received to site Sec7/h3 - HOM1 - Housing Allocations.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

This is a notable site for the settlement in terms of the number of residential units. It should be noted however that there are a number of housing developments already under construction and / or completed within the vicinity to date within the Plan period. Notable of which are Prc2/h18 (32 units), prc2/h19 (240 units initially) and prc2/h21 (34 units), as well as sites in Hendy. To this end, the supply of housing across the plan

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**period within the vicinity is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.**

***Action***

**No change to the Plan.**



**Representation(s)****3923 Mr A Richards [4122]****Object****Agent: Evans Banks Planning Limited (Richard Banks) [4967]****Summary:**

The site remains undeveloped but allocated. No planning permission has ever been sought for residential development on the site. The site was included in the Llanelli Borough Local Plan (1996), Carmarthenshire Unitary Development Plan (2003) and within the Local Development Plan (2014). Consequently, twenty-five years of Development Plan allocations have elapsed without any signs of wholesale delivery of this site. Clearly, there is no historic demand for a site of this scale in this part of the Llangennech area. It is almost certainly a physically challenging site, covered in mature and dense vegetation, with mature trees along its entire eastern perimeter covered and protected by a large Tree Preservation Order. A Google Earth image covers the vegetated spread over the site. The site is undoubtedly rich in ecological habitats which may further hinder its delivery. Yet despite these obvious deficiencies, the Council is prepared to allocate the site once again in a new Development Plan? The site's retention in the deposit Plan is shown to be even more inconsistent as it does not sit with LDP Procedural Guidance which encourages Local Planning Authorities to only reallocate sites based upon firm evidence of deliverability. The site's allocation results in the Deposit LDP being unsound. Reference is made to representation 3921 where the client's land is promoted.

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***Council's Initial Response***

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the delivery of this site.**

**Feedback attained from the landowner/developer (December 2020) confirms intent to deliver in accordance with the Plan period.**

**This feedback outlines the following:**

**Development of the site (note this is an allocation in the current/adopted LDP) was delayed due to investment being required at the Llangennech Dwr Cymru Welsh Water (DCWW) treatment works, however DCWW have confirmed that the works are underway and as such this is no longer an issue. The County Council's Housing Department have confirmed that they have a requirement for new build homes in Llangennech, under their delivery programme to provide 900 new council houses. The Council (landowner) is now in the process of selecting a planning consultant to prepare and submit an outline planning application for the site. A Highway Feasibility Study has been carried out and a Transport Statement will be prepared in due course. With regards to drainage, the appointed Planning Consultants will be consulting with the Council's Sustainable Drainage Approval Body (SAB) at an early stage to inform the Drainage Strategy. In terms of delivery, it is stated that the site will be delivered by the Council's Housing section, as part of the Council's New Build Programme. Furthermore, it is stated that the site will be developed within the timescales set out in the Deposit plan's Housing Trajectory.**

**It should be noted that the landowner/developer (i.e. the Council) has committed to completing a Statement of Common Ground (SCOG).**

**Also, a viability assessment will be provided in due course - once the proposed housing mix and masterplan have been finalised to inform the appraisal.**

**Also, there has been an effort to respond to concerns raised by Natural Resources Wales by the landowner/developer.**

**Reference should be made to the Council's response to representation reference number 3586 in this regard under its responses to comments received to site Sec7/h3 - HOM1 - Housing Allocations.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

**This is a notable site for the settlement in terms of the number of residential units. It should be noted however that there are a number of housing developments already under construction and / or completed within the vicinity to date within the Plan period. Notable of which are Prc2/h18 (32 units), prc2/h19 (240 units initially) and prc2/h21 (34 units), as well as sites in Hendy. To this end, the supply of housing across the plan**

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period within the vicinity is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.

As a cross reference aid - the Council's response to representation reference number 3921 can be found within the Council's responses to representations received to policy HOM1.

*Action*

**No change to the Plan.**



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*Representation(s)***4072 Mr W R Thomas [5060]****Object*****Agent: Evans Banks Planning Limited (Richard Banks) [4967]******Summary:***

The site remains undeveloped but allocated. No planning permission has ever been sought for residential development on the site. The site was included in the Llanelli Borough Local Plan (1996), Carmarthenshire Unitary Development Plan (2003) and within the Local Development Plan (2014). Consequently, twenty-five years of Development Plan allocations have elapsed without any signs of wholesale delivery of this site. Clearly, there is no historic demand for a site of this scale in this part of the Llangennech area. It is almost certainly a physically challenging site, covered in mature and dense vegetation, with mature trees along its entire eastern perimeter covered and protected by a large Tree Preservation Order. A Google Earth image covers the vegetated spread over the site. The site is undoubtedly rich in ecological habitats which may further hinder its delivery. Yet despite these obvious deficiencies, the Council is prepared to allocate the site once again in a new Development Plan? The site's retention in the deposit Plan is shown to be even more inconsistent as it does not sit with LDP Procedural Guidance which encourages Local Planning Authorities to only reallocate sites based upon firm evidence of deliverability. The site's allocation results in the Deposit LDP being unsound. Reference is made to representation 4073 where the client's land is promoted.

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***Council's Initial Response***

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site.

Feedback attained from the landowner/developer (December 2020) confirms intent to deliver in accordance with the Plan period.

This feedback outlines the following:

Development of the site (note this is an allocation in the current/adopted LDP) was delayed due to investment being required at the Llangennech Dwr Cymru Welsh Water (DCWW) treatment works, however DCWW have confirmed that the works are underway and as such this is no longer an issue. The County Council's Housing Department have confirmed that they have a requirement for new build homes in Llangennech, under their delivery programme to provide 900 new council houses. The Council (landowner) is now in the process of selecting a planning consultant to prepare and submit an outline planning application for the site. A Highway Feasibility Study has been carried out and a Transport Statement will be prepared in due course. With regards to drainage, the appointed Planning Consultants will be consulting with the Council's Sustainable Drainage Approval Body (SAB) at an early stage to inform the Drainage Strategy. In terms of delivery, it is stated that the site will be delivered by the Council's Housing section, as part of the Council's New Build Programme. Furthermore, it is stated that the site will be developed within the timescales set out in the Deposit plan's Housing Trajectory.

It should be noted that the landowner/developer (i.e. the Council) has committed to completing a Statement of Common Ground (SCOG).

Also, a viability assessment will be provided in due course - once the proposed housing mix and masterplan have been finalised to inform the appraisal.

Also, there has been an effort to respond to concerns raised by Natural Resources Wales by the landowner/developer.

Reference should be made to the Council's response to representation reference number 3586 in this regard under its responses to comments received to site Sec7/h3 - HOM1 - Housing Allocations.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

This is a notable site for the settlement in terms of the number of residential units. It should be noted however that there are a number of housing developments already under construction and / or completed within the vicinity to date within the Plan period. Notable of which are Prc2/h18 (32 units), prc2/h19 (240 units initially) and prc2/h21 (34 units), as well as sites in Hendy. To this end, the supply of housing across the plan

period within the vicinity is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.

As a cross reference aid - the Council's response to representation reference number 4073 can be found within the Council's responses to representations received to policy HOM1.

*Action*

**No change to the Plan.**



**Representation(s)****3110 Mr Christopher Evans [3119]****Object****Summary:**

Concerns:

1. Loss of habitat for bats and birds.
2. Poor existing infrastructure and services/increased pollution.
3. Historic mine works.

**3083 Mrs Linda Hicks [3109]****Object****Summary:**

We object to development at Golwg-yr-Afon as there has already been a great deal of housing development in this area over the last few years. This has resulted in the loss of trees/habitats for wildlife and the proposed area in question is one of the few green areas left. We are concerned about the mining workings in that area and Golwg yr Afon is a quiet narrow street and could not sustain an increase in traffic. The infrastructure of the village cannot cope with more housing as we have no post office, an overstretched surgery and oversubscribed primary school.

**3173 Mr Kenneth Grayson [4861]****Object****Summary:**

The surrounding area is already over developed considering the infrastructure limitations of the village.

This particular area is an important habitat for bats, woodpecker and other birds. This area is also infested with knotweed

**3070 Mr Gary Jones [4783]****Object****Summary:**

1. This is an area which has numerous trees and wildlife etc
- 2 There are numerous mine workings and residue from a Tinplate works
3. A children's park was removed to make This more attractive to a buyer
4. The village is already congested with high pollution levels in the Main Street
- 5 How will building on council owned land contribute to the nett zero carbon ambition.
- 6 It was on the previous LDP with no takers, what has changed?

**3108 Mr Paul parry [3245]****Object****Summary:**

My objection includes environmental issues, access to land, removal of the park by CCC, infrastructure including access to schools, doctors surgeries, hospital, sewerage etc. There are old mine workings and streams in the area, also the stability of the land that existing houses are built on and existing subsidence in the road on Heol Plas Isaf.

Trees will have to be cut down, loss of habitat for birds and bats also foxes.

I have kept a list of all the wildlife should it be required.

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**3119 Mrs C Thomas [574]****Object***Summary:*

Object to the plan to build housing to the rear of Clos Plas Isaf Llangennech. This is largely a woodland area with a great deal of wildlife. With so much being said about conservation and trees being the lungs of the world the council should be planting more trees and extending the woodland walks which are so popular in the area. There is already plenty of housing in this area with quite a few empty starter home properties. yet the only park for the children in the area has been demolished . Newspapers repeatedly say that children should have exercise and get away from their i pads and what does our council do? take away their play area.

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**3107 Mr Wyn Richards [4835]****Object***Summary:*

Golwg yr Afon is already a congested street, with several households owning more than one car, causing families to park on the road. Access to the road is often precarious. A proposed development will, surely, add to the build up of cars on this road. More cars = more pollution. The proposed development site will need its trees to be cut down, causing a loss of habitat for birds and other wildlife.

The village already has a poor infrastructure - the post office closed down, and the local surgery is understaffed, causing long delays.

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**Council's Initial Response**

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site.

Feedback attained from the landowner/developer (December 2020) confirms intent to deliver in accordance with the Plan period.

This feedback outlines the following:

Development of the site (note this is an allocation in the current/adopted LDP) was delayed due to investment being required at the Llangennech Dwr Cymru Welsh Water (DCWW) treatment works, however DCWW have confirmed that the works are underway and as such this is no longer an issue. The County Council's Housing Department have confirmed that they have a requirement for new build homes in Llangennech, under their delivery programme to provide 900 new council houses. The Council (landowner) is now in the process of selecting a planning consultant to prepare and submit an outline planning application for the site. A Highway Feasibility Study has been carried out and a Transport Statement will be prepared in due course. With regards to drainage, the appointed Planning Consultants will be consulting with the Council's Sustainable Drainage Approval Body (SAB) at an early stage to inform the Drainage Strategy. In terms of delivery, it is stated that the site will be delivered by the Council's Housing section, as part of the Council's New Build Programme. Furthermore, it is stated that the site will be developed within the timescales set out in the Deposit plan's Housing Trajectory.

It should be noted that the landowner/developer (i.e. the Council) has committed to completing a Statement of Common Ground (SCOG).

Also, a viability assessment will be provided in due course - once the proposed housing mix and masterplan have been finalised to inform the appraisal.

Also, there has been an effort to respond to concerns raised by Natural Resources Wales by the landowner/developer.

Reference should be made to the Council's response to representation reference number 3586 in this regard under its responses to comments received to site Sec7/h3 - HOM1 - Housing Allocations.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

Reference can be made to the Council's response to representation reference number 3176 (under policy SP16) in regards those wider concerns raised about the settlement (e.g. infrastructure, capacity etc).

This is a notable site for the settlement in terms of the number of residential units. It

should be noted however that there are a number of housing developments already under construction and / or completed within the vicinity to date within the Plan period. Notable of which are Prc2/h18 (32 units), prc2/h19 (240 units initially) and prc2/h21 (34 units), as well as sites in Hendy. To this end, the supply of housing across the plan period within the vicinity is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.

*Action*

No change to the Plan.

**Paragraph HOM1: Housing Allocations, SeC7/h4**

*Representation(s)*

4194 Persimmon Homes West Wales (Stuart Phillips) [5154] Object

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

Reference should be made to the Council's response to representation reference number 3801. This can be found within the Council's responses to comments made in regards site sec7/h4 - HOM1 - Housing Allocations.

(Cross referencing note - the Council's response to representation number 4143 can be found under the Council's response to representations made under policy sp3. The Council's response to representation number 4142 can be viewed under the Council's HOM1 policy responses).

*Action*

No change to the Plan.

*Representation(s)*

**3356 mr. William griffiths [4896]**

**Object**

*Summary:*

This seems to be another example of building in a green belt area with ancient trees and pleasing rural aspects. This would be environmentally and visually extremely sad for the village in my opinion. This site is also in an area of low lying land, near to the Morlais River and I believe within the wider Llangennech flood plain zone, bordered by the tidal river Loughor. Recent high tides and rain have resulted in considerable water retention in this area and only the mid-wales railway embankment has provided major flooding issues in this area. In the light of recent flooding experiences across Wales and other parts of the UK, often related to housing developments in flood plain areas, I believe it would be unwise in the extreme for any specific planning application to be granted for this particular site. With on-going environmental change and global warming likely to produce more challenging weather conditions over the next 10 years and beyond, the Carmarthenshire County Council needs to re-examine its whole approach to such planning applications and particularly to flood plain developments or allowing building near to key rivers and waterways. I strongly object to any development on the site and hope you will look very carefully at any such proposal. Reference is also made to representation 3355 (policy sp16).

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3801. This can be found within the Council's responses to comments made in regards site sec7/h4 - HOM1 - Housing Allocations.**

**The Council's response to representation reference number 3355 can be viewed under the Council's response to representations received under Policy sp16.**

*Action*

**No change to the Plan.**



*Representation(s)*

4265 - RSAI - [4993]

Object

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

*Summary:*

At a Medium risk of flooding according to the Council's SFCA. When considered with allocation SEC7/h3 (see rep 4264 against site sec7/h3), of 107 dwellings proposed for allocation in Llangennech, 85 of these have a medium flood risk and are adjacent to Zone B and Zone C2 as classified by the current TAN 15 maps. We question the suitability of the 'medium risk' sites, whether they will be able to meet the new TAN 15 justification test and ultimately whether they are deliverable. We consider this to be a concern given the recent devastating flooding in South Wales and the Welsh Government's aspiration of ensuring resilient developments (Well Being Goal as set out in the Well-being of Future Generations Act) that are not at risk of flooding. The consultation document on TAN15 seeks to direct development to Zone 1 (very low risk) and only to Zone 2 (low risk) if the development meets strict tests. We question whether it is appropriate to allocate sites within areas of flood risk when there are other suitable and sustainable sites in the same settlement that have a low risk of flooding. We consider that suitable sites that are of the very lowest flood risk should be allocated ahead of others that have a higher flood risk. Our client's site should be looked at positively in this regard - reference is made to the client's promotion representation number 4243.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3801. This can be found within the Council's responses to comments made in regards site sec7/h4 - HOM1 - Housing Allocations.**

**As a cross reference note - the respondent's site is promoted under representation reference number 4243. The Council's response to this can be viewed under the Council's HOM1 policy responses.**

*Action*

**No Change to the Plan**





*Representation(s)*

**4316 Persimmon Homes West Wales (Stuart Phillips) [5154]**

**Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3801. This can be found within the Council's responses to comments made in regards site sec7/h4 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation number 4276 can be found under the Council's response to representations made under policy sp3. The Council's response to representation numbers 4272 and 4275 can be viewed under the Council's HOM1 policy responses).**

*Action*

**No change to the Plan.**



**Representation(s)****3801 Mr W R Thomas [5060]****Support****Agent: Evans Banks Planning Limited (Richard Banks) [4967]****Summary:**

Fully support the decision to include the land as a Residential Allocation within the development limits. A full planning application is currently under preparation to construct a total of 30 houses. Reference is given to DCWW investment in Llangennech. It is envisaged that the application will be subject to a formal Pre-Application Consultation exercise in April 2020, and subsequently formally submitted to the Local Planning Authority in May 2020. The Applicants are regional housing developers, and locally well-known for having a proven track record of fully delivering residential housing schemes of this scale. They plan to commence works on the site within two months of acquiring planning permission, and thus potentially within 12 months of the date of this Representation to the Deposit LDP.

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*Council's Initial Response*

**Comments noted/support welcomed.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the deliverability of this site. Further communication from the respondent/agent (October 2020) confirms the recent submission of an application for full planning permission for 30 dwelling houses for the site (referenced PL/00470) - Haywood Homes.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period. Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP - however the progress already made is noted - see above.**

**The Council notes that the reserved matters application is in fact for 30 units and not the 35 which is in the deposit Revised LDP. As such, the Council will decrease the allocated figure on this site to 30 units.**

**It is also considered that the site's position in the trajectory needs to be amended / brought forward to reflect the progress made and following feedback from the agent.**

**This is a notable site for the settlement in terms of the number of residential units. It should be noted however that there are a number of housing developments already under construction and / or completed within the vicinity to date within the Plan period. Notable of which are Prc2/h18 (32 units), prc2/h19 (240 units initially) and prc2/h21 (34 units), as well as sites in Hendy. To this end, the supply of housing across the plan period within the vicinity is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period.**

*Action*

**Amend the Plan by way of focused change(s) - decrease the allocated units for this site, decrease the Total Affordable Units in Plan period for this site (policy HOM1:Housing Allocations) and also amend the housing trajectory.**



**Paragraph HOM1: Housing Allocations, SeC7/h5*****Representation(s)*****4196 Persimmon Homes West Wales (Stuart Phillips) [5154]****Object*****Agent:******WYG PLANNING & ENVIRONMENT (Louise Darch) [598]******Summary:***

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

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*Council's Initial Response*

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site. Feedback attained from the developer / landowner (November 2020) confirms intent to deliver in accordance with the Plan period. This feedback states that this site is identified as a candidate site for the Welsh Government's newly developed Self Build Wales scheme. The purpose of the scheme is to allow potential home owners to build their own home in a place they want to live with assistance from the Development Bank of Wales who provide a 2 year interest free loan for the construction of the home. It is stated that the Development Bank of Wales is already receiving interest in the site which has been generated through the Welsh Government Self Build webpage.

The proposed site layout, design and costings are currently being finalised by the Council prior to submission of planning permission.

The feedback indicates the site allocation area can be increased and an allocation figure of 7 units provided.

In terms of the trajectory, the feedback indicates that it may be appropriate to split the units as follows: 3 completing in 2022/23 and 4 in 2023/24.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period. Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP - however it is noted that much evidential work has already been completed (see above).

(Cross referencing note - the Council's response to representation number 4143 can be found under the Council's response to representations made under policy sp3. The Council's response to representation number 4142 can be viewed under the Council's HOM1 policy responses).

*Action*

**No change to the Plan as a result of this representation / objection.**

(However it should be noted that following the feedback received from the landowner/developer (as discussed in Council's response above) an amendment will be made to the Plan by way of focused change(s) as follows: increase the site area, increase the allocated units for this site, increase the Total Affordable Units in Plan period for this site (policy HOM1:Housing Allocations) and also amend the housing trajectory for this site.



**Representation(s)****4317 Persimmon Homes West Wales (Stuart Phillips) [5154]****Object****Agent:****WYG PLANNING & ENVIRONMENT (Louise Darch) [598]****Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

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*Council's Initial Response*

**Comments noted.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site. Feedback attained from the developer / landowner (November 2020) confirms intent to deliver in accordance with the Plan period. This feedback states that this site is identified as a candidate site for the Welsh Government's newly developed Self Build Wales scheme. The purpose of the scheme is to allow potential home owners to build their own home in a place they want to live with assistance from the Development Bank of Wales who provide a 2 year interest free loan for the construction of the home. It is stated that the Development Bank of Wales is already receiving interest in the site which has been generated through the Welsh Government Self Build webpage.

The proposed site layout, design and costings are currently being finalised by the Council prior to submission of planning permission.

The feedback indicates the site allocation area can be increased and an allocation figure of 7 units provided.

In terms of the trajectory, the feedback indicates that it may be appropriate to split the units as follows: 3 completing in 2022/23 and 4 in 2023/24.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period. Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP - however it is noted that much evidential work has already been completed (see above).

(Cross referencing note - the Council's response to representation number 4276 can be found under the Council's response to representations made under policy sp3. The Council's response to representation numbers 4272 and 4275 can be viewed under the Council's HOM1 policy responses).

*Action*

**No change to the Plan as a result of this representation / objection.**

(However it should be noted that following the feedback received from the landowner/developer (as discussed in Council's response above) an amendment will be made to the Plan by way of focused change(s) as follows: increase the site area, increase the allocated units for this site, increase the Total Affordable Units in Plan period for this site (policy HOM1:Housing Allocations) and also amend the housing trajectory for this site.



## Paragraph HOM1: Housing Allocations, SeC8/h2

### Representation(s)

**3912 Evans Banks Planning Limited (Richard Banks) [4967] Object**

#### *Summary:*

The site has been in Development Plans stretching back to the Llanelli Borough Local Plan in 1995. It has only been developed with 5 houses, and thus its continued allocation for dozens more units in the draft LDP must surely come under question? That site was allocated in the 2003 UDP and 2014 LDP and has not shown any signs of implementation nor active delivery. The site's retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. We therefore object to the proposed allocation, as its inclusion within the Plan fails the tests of soundness.

**3631 Mr B.O. Beynon [5011] Object**

***Agent: Evans Banks Planning Limited (Richard Banks) [4967]***

#### *Summary:*

Has been in Development Plans stretching back to the Llanelli Borough Local Plan in 1995. It has only been developed with 5 houses, and thus its continued allocation for dozens more units in the draft LDP must surely come under question? Consequently, at least seventeen years of Development Plan allocations have elapsed without any signs of wholesale delivery (commentary grouped with other sites Sec4/h2, Sec5/h2, SuV22/h1 which have also been lodged as objections). Clearly, there is no historic demand for sites of these scales in parts of the Llanelli, Trimsaran and Burry Port / Pembrey areas. All are certainly physically challenging sites, many of which have historic industrial or coal mining legacy issues, which may require significant abnormal costs to achieve developable areas for residential use. Reference is made to rep 3597 where the client's land is promoted.

**4104 Mr & Mrs K & T Jones [4052] Object**

***Agent: Evans Banks Planning Limited (Richard Banks) [4967]***

#### *Summary:*

Has been in Development Plans stretching back to the Llanelli Borough Local Plan in 1995. It has only been developed with 5 houses, and thus its continued allocation for dozens more units in the draft LDP must surely come under question? Consequently, at least seventeen years of Development Plan allocations have elapsed without any signs of wholesale delivery (commentary grouped with other sites Sec4/h2, Sec5/h2, SuV22/h1 which have also been registered as objections). Clearly, there is no historic demand for sites of these scales in parts of the Llanelli, Trimsaran and Burry Port / Pembrey areas. All are certainly physically challenging sites, many of which have historic industrial or coal mining legacy issues, which may require significant abnormal costs to achieve developable areas for residential use. Reference is made to rep 4096 where the client's land is promoted.



**3645 Mr & Mrs V & J Griffiths [555]****Object*****Agent: Evans Banks Planning Limited (Richard Banks) [4967]******Summary:***

Has been in Development Plans stretching back to the Llanelli Borough Local Plan in 1995. It has only been developed with 5 houses, and thus its continued allocation for dozens more units in the draft LDP must surely come under question? Consequently, at least seventeen years of Development Plan allocations have elapsed without any signs of wholesale delivery (commentary grouped with other sites Sec4/h2, Sec5/h2, SuV22/h1 which have also been lodged as objections). Clearly, there is no historic demand for sites of these scales in parts of the Llanelli, Trimsaran and Burry Port / Pembrey areas. All are certainly physically challenging sites, many of which have historic industrial or coal mining legacy issues, which may require significant abnormal costs to achieve developable areas for residential use. It is not clear whether any progress will be made on the sole allocated site at Cae Linda. Our clients submit that their site is no different in planning status than their potential site. They consider that there is an unmet demand and need for an alternative housing allocation for the mid to later years of the Plan Period, other than those sites which have been proposed in the draft LDP. Reference is made to reps 3621 and 3637 where the client's land is promoted.

**4125 Mr B.O. Beynon [5011]****Object*****Agent: Evans Banks Planning Limited (Richard Banks) [4967]******Summary:***

Has been in Development Plans stretching back to the Llanelli Borough Local Plan in 1995. It has only been developed with 5 houses, and thus its continued allocation for dozens more units in the draft LDP must surely come under question? Consequently, at least seventeen years of Development Plan allocations have elapsed without any signs of wholesale delivery (commentary grouped with other sites Sec4/h2, Sec5/h2, SuV22/h1 which have also been lodged as objections). Clearly, there is no historic demand for sites of these scales in parts of the Llanelli, Trimsaran and Burry Port / Pembrey areas. All are certainly physically challenging sites, many of which have historic industrial or coal mining legacy issues, which may require significant abnormal costs to achieve developable areas for residential use. Reference is made to rep 4118 where the client's land is promoted.

**3383 Mr C Hurley [4688]****Object*****Agent: JCR Planning Ltd (Mr Craig Jones) [4665]******Summary:***

Has been in Development Plans stretching back to the Llanelli Borough Local Plan in 1995. It has only been developed with 5 houses, and thus its continued allocation for dozens more units in the draft LDP must surely come under question? Consequently, at least seventeen years of Development Plan allocations have elapsed without any signs of wholesale delivery (commentary grouped with other sites Sec4/h2, Sec5/h2, SuV22/h1 which have also been lodged as objections). Clearly, there is no historic demand for sites of these scales in parts of the Llanelli, Trimsaran and Burry Port / Pembrey areas. All are certainly physically challenging sites, many of which have historic industrial or coal mining legacy issues, which may require significant abnormal costs to achieve developable areas for residential use. Reference is made to rep 4186 where the client's land is promoted.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**Further evidential work will be provided at the examination in to the revised LDP.**

*Action*

**No change to the Plan.**



## Paragraph HOM1: Housing Allocations, SuV22/h1

### *Representation(s)*

**3910 Evans Banks Planning Limited (Richard Banks) [4967] Object**

***Summary:***

The site has remained undeveloped, despite outline planning permission being granted nearly three years ago in 2017. That site was allocated in the 2014 LDP and has not shown any signs of implementation nor active delivery. The site's retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability. We therefore object to the proposed allocation, as its inclusion within the Plan fails the tests of soundness.

**3632 Mr B.O. Beynon [5011] Object**

***Agent: Evans Banks Planning Limited (Richard Banks) [4967]***

***Summary:***

Has remained undeveloped, despite outline planning permission being granted nearly three years ago in 2017. Consequently, at least seventeen years of Development Plan allocations have elapsed without any signs of wholesale delivery (commentary grouped with other sites Sec4/h2, Sec5/h2, SeC8/h2 which have also been lodged as objections). Clearly, there is no historic demand for sites of these scales in parts of the Llanelli, Trimsaran and Burry Port / Pembrey areas. All are certainly physically challenging sites, many of which have historic industrial or coal mining legacy issues, which may require significant abnormal costs to achieve developable areas for residential use. Reference is made to rep 3597 where the client's land is promoted.

**3384 Mr C Hurley [4688] Object**

***Agent: JCR Planning Ltd (Mr Craig Jones) [4665]***

***Summary:***

Has remained undeveloped, despite outline planning permission being granted nearly three years ago in 2017. Consequently, at least seventeen years of Development Plan allocations have elapsed without any signs of wholesale delivery (commentary grouped with other sites Sec4/h2, Sec5/h2, SeC8/h2 which have also been lodged as objections). Clearly, there is no historic demand for sites of these scales in parts of the Llanelli, Trimsaran and Burry Port / Pembrey areas. All are certainly physically challenging sites, many of which have historic industrial or coal mining legacy issues, which may require significant abnormal costs to achieve developable areas for residential use. Reference is made to rep 4186 where the client's land is promoted.

**4197 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

***Agent:***

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

***Summary:***

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**3646 Mr & Mrs V & J Griffiths [555]****Object*****Agent: Evans Banks Planning Limited (Richard Banks) [4967]******Summary:***

Has remained undeveloped, despite outline planning permission being granted nearly three years ago in 2017. Consequently, at least seventeen years of Development Plan allocations have elapsed without any signs of wholesale delivery (commentary grouped with other sites Sec4/h2, Sec5/h2, SeC8/h2 which have also been lodged as objections). Clearly, there is no historic demand for sites of these scales in parts of the Llanelli, Trimsaran and Burry Port / Pembrey areas. All are certainly physically challenging sites, many of which have historic industrial or coal mining legacy issues, which may require significant abnormal costs to achieve developable areas for residential use. Reference is made to reps 3621 and 3637 where the client's land is promoted.

**4318 Persimmon Homes West Wales (Stuart Phillips) [5154]****Object*****Agent:******WYG PLANNING & ENVIRONMENT (Louise Darch) [598]******Summary:***

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4089 Evans Banks Planning Limited (Richard Banks) [4967]****Object*****Summary:***

Land opposite Parc-y-Garreg in Mynyddygareg (SuV22/h1) for 30 units has remained undeveloped, despite outline planning permission being granted nearly three years ago in 2017.

That site was allocated in the 2014 LDP and has not shown any signs of implementation nor active delivery.

The site's retention does not sit with Assembly Government LDP Procedural Guidance which encourages Local Planning Authorities to only re-allocate sites based upon firm evidence of deliverability.

We therefore object to the proposed allocation, as its inclusion within the Plan fails the tests of soundness

4126 Mr B.O. Beynon [5011]

Object

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Has remained undeveloped, despite outline planning permission being granted nearly three years ago in 2017. Consequently, at least seventeen years of Development Plan allocations have elapsed without any signs of wholesale delivery (commentary grouped with other sites Sec4/h2, Sec5/h2, SeC8/h2 which have also been lodged as objections). Clearly, there is no historic demand for sites of these scales in parts of the Llanelli, Trimsaran and Burry Port / Pembrey areas. All are certainly physically challenging sites, many of which have historic industrial or coal mining legacy issues, which may require significant abnormal costs to achieve developable areas for residential use. Reference is made to rep 4118 where the client's land is promoted.

4105 Mr & Mrs K & T Jones [4052]

Object

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Has remained undeveloped, despite outline planning permission being granted nearly three years ago in 2017. Consequently, at least seventeen years of Development Plan allocations have elapsed without any signs of wholesale delivery (commentary grouped with other sites Sec4/h2, Sec5/h2, SeC8/h2 which have also been registered as objections). Clearly, there is no historic demand for sites of these scales in parts of the Llanelli, Trimsaran and Burry Port / Pembrey areas. All are certainly physically challenging sites, many of which have historic industrial or coal mining legacy issues, which may require significant abnormal costs to achieve developable areas for residential use. Reference is made to rep 4096 where the client's land is promoted.

*Council's Initial Response*

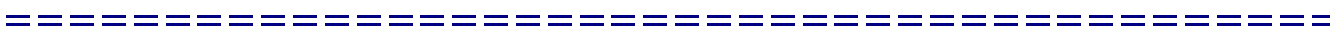
**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**The site has outline planning permission and the landowners have recently stated their intention to progress with the site.**

**Further evidential work will be provided at the examination in to the revised LDP.**

*Action*

**No change to the Plan**



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**Paragraph HOM1: Housing Allocations, SuV22/h3**

*Representation(s)*

**3731 Dr D Gravell [3663]**

**Support**

***Agent: Evans Banks Planning Limited (Richard Banks) [4967]***

***Summary:***

Wholeheartedly welcome the decision of the Authority to concur with the representation previously made in relation to our Clients land and fully support their decision to include the land within the development limits. They intend enacting upon this inclusion shortly after the LDP is formally adopted, by means of a formal planning application, and thereafter commence implementation of the development of the site within the early years of the Plan Period.

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***Council's Initial Response***

**Support Welcomed**

***Action***

**No change to the Plan**

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**Paragraph HOM1: Housing Allocations, SuV23/h1***Representation(s)***3222 D Bowler [5092]****Object*****Agent: Asbri Planning Ltd (Mr Keith Warren) [592]******Summary:***

Policy HOM 1 is objected to on the basis that the number of dwellings proposed in housing land allocation SuV23/h1 - Clos Y Parc (20 dwellings) should be reduced to 16.

The site is subject to a current Reserved Matters planning application for 16 dwellings (S/40024).

This immediately points to a shortfall in provision in the settlement cluster of 4 dwellings, which could be compensated for by the inclusion of the site proposed at Horeb within extended development limits.

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*Council's Initial Response*

**Comments noted / agreed in regards reducing the numbers allocated on this site.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council has confidence in the delivery of this site. The approval of Reserved Matters under Application S/40024 for 16 dwelling houses is noted. Feedback has been received from the planning application agent (October 2020) which provides further confidence in this regard.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period. There is consensus between the Council and the landowner/ developer regarding the Plan's Housing Trajectory.**

**Where appropriate, further evidential work can be undertaken prior to the Examination into the revised LDP - however reference is made to the progress already made as per the above.**

**Notwithstanding the above, the Plan has an allocated figure of 20 units for this site. This will be reduced to 16 units to reflect the planning permission.**

**With regards the proposal from the respondent at Horeb, reference should be made to the Council's response to representation reference number 3220 which can be viewed within the Council's responses to comments made under policy SD1.**

**However, for clarity, it is not considered that there will be any material shortfall in housing supply within the settlement even taking into account a reduction in the allocated numbers on this site (i.e. site Suv23/h1) to 16 units.**

*Action*

**Amendment will be made to the Plan by way of focused change (s) as follows:  
decrease the allocated units for this site. Amend the housing trajectory as a result.**





**Paragraph HOM1: Housing Allocations, SuV23/h2**

*Representation(s)*

**4198 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3753. This can be found within the Council's responses to comments made in regards site Suv23/h2 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation number 4143 can be found under the Council's response to representations made under policy sp3. The Council's response to representation number 4142 can be viewed under the Council's HOM1 policy responses).**

*Action*

**No change to the Plan.**



*Representation(s)*

**4319 Persimmon Homes West Wales (Stuart Phillips) [5154]**

**Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3753. This can be found within the Council's responses to comments made in regards site Suv23/h2 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation number 4276 can be found under the Council's response to representations made under policy sp3. The Council's response to representation numbers 4272 and 4275 can be viewed under the Council's HOM1 policy responses).**

*Action*

**No change to the Plan.**



*Representation(s)*

**3221 D Bowler [5092]**

**Object**

**Agent: Asbri Planning Ltd (Mr Keith Warren) [592]**

*Summary:*

Policy HOM1 is objected to on the basis that exclusion of site SuV23/h2 - Adjacent Little Croft (25 dwellings) as a residential allocation is sought. The site has not been the subject of a planning application, and apart from a statement indicating that there is development interest, there is little indication that the site will be developed. Indeed the site has been included in the Council's 5 year land supply in Joint Housing Land Supply Scheduled since 2015. Welsh Government advice is to remove such sites which have proved to be undeliverable. It is understood that the landowners may live abroad and have no intention to dispose of the site to developers. The Proposals Map is also objected to on these grounds.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 3753. This can be found within the Council's responses to comments made in regards site Suv23/h2 - HOM1 - Housing Allocations.**

*Action*

**No Change to the Plan.**

=====

*Representation(s)*

**3753 Frances Jones [4713]**

**Support**

*Summary:*

Supports the allocation. The site has recently been placed in the hands of and is being actively marketed by local valuers/surveyors (agent). Contact has been made with a number of developers, four of whom have given a positive response. As of the 27th March 2020, negotiations and discussions are "on hold" because of the Coronavirus crisis, but the Agent is confident that, when the country and the market return to normality, a buyer will be found. His assessment is that Five Roads is a popular location with strong values which will allow for viable development within the policies and aims of the LDP.

*Council's Initial Response*

**Comments noted/support welcomed.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The Council is confident in the deliverability of this site. Feedback has been received from both the respondent and an interested party / developer in October 2020. Notable amongst this feedback is an update from GRD Limited which states that terms have been agreed with the trustees for the purchase of the site and solicitors have been instructed to deal with the sale and purchase agreement. There is consensus regarding the Plan's Housing Trajectory.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, PrC3/h1**

*Representation(s)*

**4201 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4307 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. The allocation identified within the LDP makes sufficient provision for the housing needs of this settlement.**

*Action*

**No change to the Plan.**

## Paragraph HOM1: Housing Allocations, PrC3/h4

### Representation(s)

- 4037 Mr & Mrs P & J Knight [3953]** **Object**  
**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**  
**Summary:**  
 Planning permission was last granted in 2014 for 289 dwellings (outline) and this has lapsed. Whilst the landowners sought to vary conditions upon that permission to extend the validity of the outline permission (approved in October 2019) this does little to display any real progress in the deliverability of the site (reference is made to the phasing plan). In spite of the planning history, thirty years of Development Plan allocations have elapsed without any signs of delivery of this site and more physically challenging sites in the area, such as the re-development of the Betws Colliery site, have come forward long before this site. Reference is made to other sites omitted from the Deposit LDP (inc LDP site GA3/h23 which has an outline planning permission) - yet this site remains in the deposit Plan and therefore the LDP is shown to be even more inconsistent, as it does not sit with LDP Procedural Guidance which encourages Local Planning Authorities to only reallocate sites based upon firm evidence of deliverability. The site's allocation results in the Deposit LDP being unsound. Reference is made to representation 4036 where the client's site is promoted.
- 
- 4386 Lady Julie Romani [817]** **Object**  
**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**  
**Summary:**  
 Having considered the allocations in Cluster 3, in terms of their sustainability level, technical deliverability and recent planning history, we consider that a number will not be brought forward during the Plan period and so will result in the Plan being unsound if it is adopted in its current form. This includes allocation PrC3/h4 Tirychen Farm, Penybank.
- 
- 3308 Barratt David Wilson Homes (Mrs Francesca Evans) [4879]** **Object**  
**Summary:**  
 Summary: this is an historic allocation and there has been little progress in bringing the site forward for development despite extensive marketing. The site is not deliverable within the Plan period.
- 
- 4411 Mr V Vijayasundaram [5091]** **Object**  
**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**  
**Summary:**  
 Objection to the allocation of site PrC3/h4, seeking the site's removal from the Deposit Plan under policy HOM1.  
  
 We submit that the draft allocation at Tirychen be omitted from the Plan, and that housing allocation be redistributed to modest Candidate Sites, of up to 40 units. There is clear evidence in Betws, Ammanford and Penybank that such modest sites are far more likely to be brought forward and developed in full by regional and small housebuilders given that construction and development costs are more likely to be viable in relation to house sales and the general housing market in this part of Carmarthenshire.
-

3964	<b>Mr Harries Mrs Sainty [5104]</b>	<b>Object</b>
<b>Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]</b>		
<i>Summary:</i>		
Objection to the inclusion of Tirychen Farm as an allocation within the Deposit LDP		
<p>Planning permission was last granted in 2014 for 289 dwellings, under Application E/21633. However, that permission was only granted in outline form. It subsequently lapsed, and the landowners sought to vary conditions upon that permission to extend the validity of the outline permission. That Variation of Condition application was finally approved in October 2019, under Application E/38686. The recently approved Variation of Condition permission does little to display any real progress in the deliverability of the site. It merely amounts to the landowners seeking to continue to benefit from an outline planning permission at the site</p>		
3972	<b>Magnet Properties Limited ( _ _ _ ) [5107]</b>	<b>Object</b>
<b>Agent: Evans Banks Planning Limited (Richard Banks) [4967]</b>		
<i>Summary:</i>		
We submit that the draft allocation at Tirychen PrC3/h4 be omitted from the Plan, and that housing allocation be redistributed to Alternative Sites.		
<p>Planning permission was last granted in 2014 for 289 dwellings, under Application E/21633. However, that permission was only granted in outline form. It subsequently lapsed, and the landowners sought to vary conditions upon that permission to extend the validity of the outline permission. That Variation of Condition application was finally approved in October 2019, under Application E/38686. The recently approved Variation of Condition permission does little to display any real progress in the deliverability of the site. It merely amounts to the landowners seeking to continue to benefit from an outline planning permission at the site</p>		
4415	<b>Mr B Owen [5118]</b>	<b>Object</b>
<b>Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]</b>		
<i>Summary:</i>		
Objection to the inclusion of PrC3/h4 - the council is prepared to allocate the site once again in a new Development Plan despite clear doubts over its deliverability within the Plan period.		
4202	<b>Persimmon Homes West Wales (Stuart Phillips) [5154]</b>	<b>Object</b>
<b>Agent: WYG PLANNING &amp; ENVIRONMENT (Louise Darch) [598]</b>		
<i>Summary:</i>		
<p>The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.</p>		

<b>4018</b>	<b>Mr &amp; Mrs Davies [5123]</b> <i>Agent: Aspinal's Planning &amp; Legal (David Lucas) [5125]</i> <i>Summary:</i> Objection to HOM1. There is no confidence that allocation PrC3/h4 can be fully implemented given that this is a re-allocation of a site previously allocated in a development plan, which had no prospect of coming forward.	<b>Object</b>
<b>4388</b>	<b>Mr A Pritchard [5153]</b> <i>Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]</i> <i>Summary:</i> Objection to the inclusion of PrC3/h4 in the Deposit Revised LDP under policy HOM1	<b>Object</b>
<b>4408</b>	<b>Mr L W Jones [5066]</b> <i>Agent: Evans Banks Planning Limited (Richard Banks) [4967]</i> <i>Summary:</i> Submit that the draft allocation at Tirychen be omitted from the Plan, and that housing allocation be redistributed to small and modest Candidate Sites, of between 5 up to 25 units such as that proposed at Heol Ddu / Brynteg. There is clear evidence in Tycroes, Capel Hendre and Saron that such modest sites are far more likely to be brought forward and developed in full by regional and small housebuilders given that construction and development costs are more likely to be viable in relation to house sales and the general housing market in this part of Carmarthenshire.	<b>Object</b>
<b>4052</b>	<b>Evans Banks Planning Limited (Mr Jason Evans) [2988]</b> <i>Summary:</i> In the area surrounding Ammanford, great emphasis has been placed upon the continued allocation of this large proposed housing site. Planning permission was last granted in 2014 for 289 dwellings (outline) and this has lapsed. Whilst the landowners sought to vary conditions upon that permission to extend the validity of the outline permission (approved in October 2019) this does little to display any real progress in the deliverability of the site (reference is made to the phasing plan). In spite of the planning history, thirty years of Development Plan allocations have elapsed without any signs of delivery of this site and more physically challenging sites in the area, such as the re-development of the Betws Colliery site, have come forward long before this site. Reference is made to other sites omitted from the Deposit LDP (inc LDP site GA3/h23 which has an outline planning permission) - yet this site remains in the deposit Plan and therefore the LDP is shown to be even more inconsistent, as it does not sit with LDP Procedural Guidance which encourages Local Planning Authorities to only reallocate sites based upon firm evidence of deliverability. The site's allocation results in the Deposit LDP being unsound.	<b>Object</b>
<b>4378</b>	<b>Landview Developments Ltd [5020]</b> <i>Agent: Evans Banks Planning Limited (Richard Banks) [4967]</i> <i>Summary:</i> Having considered the allocations in Cluster 3, in terms of their sustainability level, technical deliverability and recent planning history, we consider that a number will not be brought forward during the Plan period and so will result in the Plan being unsound if it is adopted in its current form. This includes allocation PrC3/h4 Tirychen Farm, Penybanc .	<b>Object</b>



**3344 Mr & Mrs Hill [4946] Object**

*Summary:*

Concerns raised - additional school places, prices of housing going down, sewerage, flooding - no drainage, road access, medical access, passageway access.

**4320 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

*Agent:*

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

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**3281 Miss Joy Richards [605] Object**

*Summary:*

I would like to question the decision to include site PrC3/h4. Please see my queries/comments below:

- Having looked at the plans for site PrC3/h4, I can see that the only available access point to the site would be on Dyffryn Road. This causes some concerns due to this section of Dyffryn road having a dangerous bend with a fast traffic flow. I believe this could cause a negative impact on the number of traffic collisions on this road, particularly as a college is based nearby.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The site has the benefit of outline planning permission.**

**Further evidential work will be undertaken prior to the examination into the revised LDP.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3258 Matthew Utting [2833]**

**Object**

*Summary:*

Whilst the principle of housing allocation ref. PrC3/h4 is supported, it is considered that the current terms of the allocation must be improved upon.

The site benefits from an extant outline consent for 289 dwellings, with access and layout granted in detail at the outline stage.

The site's existing allocation ref. GA3/h17 for 250 dwellings in Policy H1 of the Carmarthenshire Local Development Plan 2006-2021; and the terms of the site's extant outline consent ref. E/38686 for 289 dwellings clearly and unequivocally demonstrate that the site is suitable and sustainable, and available and achievable. At the very least, therefore, allocation ref. PrC3/h4 in the Deposit Revised LDP should be increased from 150 dwellings to 289 dwellings, to reflect the fact that the site is a consented 'commitment' for 289 dwellings in Ammanford.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The site has the benefit of outline planning permission**

**The council considers that given the scale of the site it is appropriate to phase the delivery over two local plan periods. Should the development come forward in its entirety during the revised LDP period in conjunction with the outline planning permission, then the additional housing completions can be considered under the windfall allowance.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3584 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

*Summary:*

Reservations regarding the allocation as it appears to provide important ecological connectivity features. Loss of ecosystem connectivity would be at odds with the fundamental aims of maintaining and enhancing biodiversity and Section 6, Part 1 of the Environment (Wales) Act 2016

*Council's Initial Response*

**Noted. The site currently benefits from outline planning permission. Any further details relating to ecological connectivity and biodiversity will be considered at reserved matters stage.**

**Further evidential work will be undertaken prior to the examination in to the revised LDP.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3257 Matthew Utting [2833]**

**Support**

*Summary:*

The principle of housing allocation ref. PrC3/h4 is supported by my client.

(See representation 3258 which makes reference to the fact that the current terms of the allocation must be improved upon)

*Council's Initial Response*

**Support Welcomed**

*Action*

**No change to Plan**

**Paragraph HOM1: Housing Allocations, PrC3/h6**

*Representation(s)*

**3836 Mr C & A Smith & Roberts [3806]**

**Support**

*Agent: Mr T Mabbitt [5075]*

*Summary:*

Support is given to the allocation of Maes Ifan (PrC3/h6) as a housing allocation. A detailed supporting statement is provided covering: adherence to the LDP strategy and policies; a sustainability appraisal; viability; and deliverability.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

**Paragraph HOM1: Housing Allocations, PrC3/h7**

*Representation(s)*

**4203 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4321 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

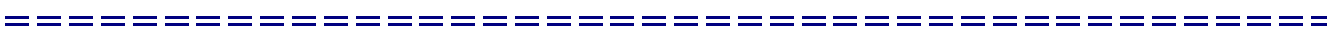
*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**The site has a pending planning application. Further evidence will be developed as the Plan goes into examination.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, PrC3/h8**

*Representation(s)*

**3967 NBA Developments (Mr Neal Atkins) [17]**

**Support**

***Agent: Asbri Planning Limited (Mr Richard Bowen) [591]***

*Summary:*

The provision to include the site as a residential allocation in the emerging Deposit Plan and acknowledged under PrC3/h8 is welcomed and supported.

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*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**



## Paragraph HOM1: Housing Allocations, PrC3/h9

### *Representation(s)*

**4283 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

***Agent:***

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

***Summary:***

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4156 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

***Agent:***

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

***Summary:***

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4040 Davies Richards Developments [5131] Object**

***Agent: Evans Banks Planning Limited (Richard Banks) [4967]***

***Summary:***

This objection represents the trend of re-allocating undeliverable sites. The site highlighted have seen consents granted on them some time ago, but each has seen little or no evidence of any development since these approvals were issued. There has clearly been no firm interest in developing the site, and therefore its deliverability must be questioned. This does not sit with LDP Procedural Guidance which encourages Local Planning Authorities to only reallocate sites based upon firm evidence of deliverability The site's allocation results in the Deposit LDP being unsound.

<b>3965</b>	<b>Mr Harries Mrs Sainty [5104]</b> <i>Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]</i> <i>Summary:</i> Objection to the inclusion of PrC3/h9 - Land adjacent to Maesyrfhaf within the Deposit LDP  The site has remained undeveloped through previous LDP plans. It has been the subject of a long-running planning application for 9 dwellings. However, it is noted that there are coal mining shafts on the site, which may pose abnormal costs for remediation. After some three years that application remains undetermined.	<b>Object</b>
<b>3971</b>	<b>Magnet Properties Limited ( _ _ _ ) [5107]</b> <i>Agent: Evans Banks Planning Limited (Richard Banks) [4967]</i> <i>Summary:</i> * Requests that PrC3/h9 is deallocated but remain within limits  Site PrC3/h9 "Land adjacent to Maesyrfhaf" has remained undeveloped through previous LDP plans. It has been the subject of a long-running planning application for 9 dwellings. However, it is noted that there are coal mining shafts on the site, which may pose abnormal costs for remediation. After some three years that application remains undetermined	<b>Object</b>
<b>4561</b>	<b>K, D, E &amp; G Fakes, James, Roberts &amp; Jones [5296]</b> <i>Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]</i> <i>Summary:</i> Despite having historic consents often repeated through extension of time applications the site has failed to deliver a significant level of housing for the growth area in question. To continue to allocate such sites for residential development therefore results in the Plan being unsound.	<b>Object</b>
<b>4050</b>	<b>Evans Banks Planning Limited (Mr Jason Evans) [2988]</b> <i>Summary:</i> The site has remained undeveloped through previous LDP plans. It has been the subject of a long-running planning application for 9 dwellings. However, it is noted that there are coal mining shafts on the site, which may pose abnormal costs for remediation. After some three years that application remains undetermined. Whilst the site is enveloped in the centre of Cross Hands, it has shown little sign of implementation and therefore we respectfully request that they it remains within settlement limits, but its allocated site status be omitted, and those dwelling numbers be re-allocated elsewhere in the locality. The site's allocation results in the Deposit LDP being unsound.	<b>Object</b>
<b>4382</b>	<b>Lady Julie Romani [817]</b> <i>Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]</i> <i>Summary:</i> Having considered the allocations in Cluster 3, in terms of their sustainability level, technical deliverability and recent planning history, we consider that a number will not be brought forward during the Plan period and so will result in the Plan being unsound if it is adopted in its current form. This includes allocation PrC3/h9 Land adjacent to Maesyrfhaf.	<b>Object</b>

4006	<b>Mr B Owen [5118]</b>	<b>Object</b>
<b>Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]</b>		
<i>Summary:</i>		
Objection to the allocation of site PrC3/h9 under policy HOM1 - Clearly has significant questions over its deliverability and genuine availability for development. To continue to allocate such a site for residential development therefore results in the Plan being unsound. Alternative sites, such as that put forward by our Client, must therefore be considered and brought forward in order to address this deficiency and ensure that the Plan is sound in all respects.		
3954	<b>Ms &amp; Mr England &amp; Davies [5102]</b>	<b>Object</b>
<b>Agent: Evans Banks Planning Limited (Richard Banks) [4967]</b>		
<i>Summary:</i>		
Objection to allocated site PrC3/h9 under policy HOM1.		
Despite having historic consents, each of the applications has still failed to contribute towards delivering a significant level of housing for the growth area in question. The site clearly has significant questions over its deliverability and genuine availability for development. To continue to allocate such sites for residential development therefore results in the Plan being unsound. Alternative sites, such as that put forward by our Client, must therefore be considered and brought forward in order to address this deficiency and ensure that the Plan is sound in all respects.		
4389	<b>Mr A Pritchard [5153]</b>	<b>Object</b>
<b>Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]</b>		
<i>Summary:</i>		
Objection to the inclusion of PrC3/h9 in the Deposit Revised LDP under policy HOM1		
3946	<b>Landview Developments [5100]</b>	<b>Object</b>
<b>Agent: Evans Banks Planning Limited (Richard Banks) [4967]</b>		
<i>Summary:</i>		
Objection to allocated site PrC3/h9 under policy HOM1.		
Despite having historic consents, each of the applications has still failed to contribute towards delivering a significant level of housing for the growth area in question. The site clearly has significant questions over its deliverability and genuine availability for development. To continue to allocate such sites for residential development therefore results in the Plan being unsound. Alternative sites, such as that put forward by our Client, must therefore be considered and brought forward in order to address this deficiency and ensure that the Plan is sound in all respects.		
3650	<b>Landview Developments Ltd [5020]</b>	<b>Object</b>
<b>Agent: Evans Banks Planning Limited (Richard Banks) [4967]</b>		
<i>Summary:</i>		
Having considered the allocations in Cluster 3, in terms of their sustainability level, technical deliverability and recent planning history, we consider that a number will not be brought forward during the Plan period and so will result in the Plan being unsound if it is adopted in its current form. This includes allocation PrC3/h9 Land adjacent Maesyrfaf.		



*Council's Initial Response*

**The site has planning permission for 9 dwellings with associated access and landscaping works. The principle of development on this site has been established.**

*Action*

**No change to Plan**

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## Paragraph HOM1: Housing Allocations, PrC3/h10

### *Representation(s)*

**3955 Ms & Mr England & Davies [5102]**

**Object**

***Agent: Evans Banks Planning Limited (Richard Banks) [4967]***

***Summary:***

Objection to allocated site PrC3/h10 under policy HOM1.

Despite having a historic consent, the application has still failed to contribute towards delivering a significant level of housing for the growth area in question. The site clearly has significant questions over its deliverability and genuine availability for development. To continue to allocate such sites for residential development therefore results in the Plan being unsound. Alternative sites, such as that put forward by our Client, must therefore be considered and brought forward in order to address this deficiency and ensure that the Plan is sound in all respects.

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**4049 Evans Banks Planning Limited (Mr Jason Evans) [2988]**

**Object**

***Summary:***

The site has remained allocated in previous Development Plans, yet remains allocated for 30 dwellings, despite not having planning permission secured in the 6 years since last adoption in 2014. An outline planning application was submitted in 2013, but not proceeded with, with the LPA finally disposing of. Details within that application reveal two major obstacles to development being the presence of a high-pressure gas main cutting traversing through the site, together with an underground main culvert. There has been no firm interest in developing the site, and therefore its deliverability must be questioned. Whilst the site is enveloped in the centre of Cross Hands, it has shown little sign of implementation and therefore we respectfully request that they it remains within settlement limits, but its allocated site status be omitted, and those dwelling numbers be re-allocated elsewhere in the locality. The site's allocation results in the Deposit LDP being unsound.

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**3947 Landview Developments [5100]**

**Object**

***Agent: Evans Banks Planning Limited (Richard Banks) [4967]***

***Summary:***

Objection to allocated site PrC3/h10 under policy HOM1.

Despite having a historic consent, the application has still failed to contribute towards delivering a significant level of housing for the growth area in question. The site clearly has significant questions over its deliverability and genuine availability for development. To continue to allocate such sites for residential development therefore results in the Plan being unsound. Alternative sites, such as that put forward by our Client, must therefore be considered and brought forward in order to address this deficiency and ensure that the Plan is sound in all respects.

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3966	<b>Mr Harries Mrs Sainty [5104]</b>	<b>Object</b>
<b>Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]</b>		
<i>Summary:</i>		
Objection to the inclusion of PrC3/h10 - Land to the rear of Gwernllwyn from the Deposit Revised LDP.		
The site has remained allocated in previous Development Plans, yet remains allocated for 30 dwellings, despite not having planning permission secured in the 6 years since last adoption in 2014. An outline planning application was submitted in 2013, but not proceeded with, with the LPA finally disposing of. Details within that application reveal two major obstacles to development being the presence of a high-pressure gas main cutting traversing through the site, together with an underground main culvert. There has been no firm interest in developing the site, and therefore its deliverability must be questioned		
4562	<b>K, D, E &amp; G Fakes, James, Roberts &amp; Jones [5296]</b>	<b>Object</b>
<b>Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]</b>		
<i>Summary:</i>		
Despite having historic consents often repeated through extension of time applications the site has failed to deliver a significant level of housing for the growth area in question. To continue to allocate such sites for residential development therefore results in the Plan being unsound.		
4383	<b>Lady Julie Romani [817]</b>	<b>Object</b>
<b>Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]</b>		
<i>Summary:</i>		
Having considered the allocations in Cluster 3, in terms of their sustainability level, technical deliverability and recent planning history, we consider that a number will not be brought forward during the Plan period and so will result in the Plan being unsound if it is adopted in its current form. This includes allocation PrC3/h10 Land to the rear of Gwernllwyn, Cross Hands.		
4284	<b>Persimmon Homes West Wales (Stuart Phillips) [5154]</b>	<b>Object</b>
<b>Agent: WYG PLANNING &amp; ENVIRONMENT (Louise Darch) [598]</b>		
<i>Summary:</i>		
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 11-15 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.		

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- 4007 Mr B Owen [5118] Object**  
**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**  
**Summary:**  
 Objection to the allocation of site PrC3/h10 under policy HOM1 - Clearly has significant questions over its deliverability and genuine availability for development. To continue to allocate such a site for residential development therefore results in the Plan being unsound. Alternative sites, such as that put forward by our Client, must therefore be considered and brought forward in order to address this deficiency and ensure that the Plan is sound in all respects.
- 
- 4157 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**  
**Agent: WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**  
**Summary:**  
 The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 11-15 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.
- 
- 4390 Mr A Pritchard [5153] Object**  
**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**  
**Summary:**  
 Objection to the inclusion of PrC3/h10 in the Deposit Revised LDP under policy HOM1
- 
- 3651 Landview Developments Ltd [5020] Object**  
**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**  
**Summary:**  
 Having considered the allocations in Cluster 3, in terms of their sustainability level, technical deliverability and recent planning history, we consider that a number will not be brought forward during the Plan period and so will result in the Plan being unsound if it is adopted in its current form. This includes allocation PrC3/h10 Land to the rear of Gwernllwyn, Cross Hands
- 
- 4041 Davies Richards Developments [5131] Object**  
**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**  
**Summary:**  
 This objection represents the trend of re-allocating undeliverable sites. The site highlighted have seen consents granted on them some time ago, but each has seen little or no evidence of any development since these approvals were issued. There has clearly been no firm interest in developing the site, and therefore its deliverability must be questioned. This does not sit with LDP Procedural Guidance which encourages Local Planning Authorities to only reallocate sites based upon firm evidence of deliverability The site's allocation results in the Deposit LDP being unsound.
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**3970 Magnet Properties Limited ( \_ \_ \_ ) [5107] Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

**Summary:**

Request that PrC3/h10 is deallocated but remain within limits.

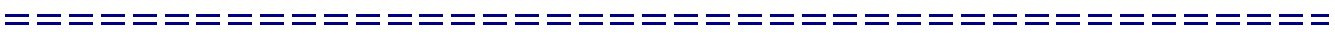
The site PrC3/h10 "Rear of Gwernllwyn" has remained allocated in previous Development Plans, yet remains allocated for 30 dwellings, despite not having planning permission secured in the 6 years since last adoption in 2014. An outline planning application was submitted in 2013, but not proceeded with, with the LPA finally disposing of. Details within that application reveal two major obstacles to development being the presence of a highpressure gas main cutting traversing through the site, together with an underground main culvert. There has ben no firm interest in developing the site, and therefore its deliverability must be questioned

**Council's Initial Response**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. Further evidence will be developed as the Plan goes to examination.**

**Action**

**No change to Plan**



## Paragraph HOM1: Housing Allocations, PrC3/h14

### Representation(s)

- 4384 Lady Julie Romani [817]** **Object**  
**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**  
**Summary:**  
 Having considered the allocations in Cluster 3, in terms of their sustainability level, technical deliverability and recent planning history, we consider that a number will not be brought forward during the Plan period and so will result in the Plan being unsound if it is adopted in its current form. This includes allocation PrC3/h14 Nantdydderwen, Drefach.
- 
- 4391 Mr A Pritchard [5153]** **Object**  
**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**  
**Summary:**  
 Objection to the inclusion of PrC3/h14 in the Deposit Revised LDP under policy HOM1
- 
- 4048 Evans Banks Planning Limited (Mr Jason Evans) [2988]** **Object**  
**Summary:**  
 The site has been allocated in previous Development Plans and it is proposed to continue to be allocated for 13 dwellings in the Deposit LDP, despite the site not benefiting from the granting of a planning permission in over 12 years. An outline planning application was last granted in 2008, but no reserved matters for this approval was then submitted. Furthermore, taking into consideration a change in economic conditions since that time, no subsequent outline or full planning application has been submitted. There has clearly been no firm interest in developing the site, and therefore its deliverability must be questioned. The site's allocation results in the Deposit LDP being unsound.
- 
- 4425 Mr Phillip Jones [3886]** **Object**  
**Summary:**  
 1) The area is wet marsh land, bordered by culverts & water courses. Any additional buildings on this site could potentially upset the water table & cause flooding. 2) Road safety (a) Increase in traffic will pose danger to pedestrians, especially children. (b) The only entrance to the estate converges on to a busy main road. Increased traffic around the entrance could pose a danger to road users.
- 
- 3948 Landview Developments [5100]** **Object**  
**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**  
**Summary:**  
 Objection to allocated site PrC3/h14 under policy HOM1.  
  
 Despite having a historic consent, the application has still failed to contribute towards delivering a significant level of housing for the growth area in question. The site clearly has significant questions over its deliverability and genuine availability for development. To continue to allocate such sites for residential development therefore results in the Plan being unsound. Alternative sites, such as that put forward by our Client, must therefore be considered and brought forward in order to address this deficiency and ensure that the Plan is sound in all respects.
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**4010 Mr B Owen [5118]****Object*****Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]******Summary:***

Objection to the allocation of site PrC3/h14 under policy HOM1 - Clearly has significant questions over its deliverability and genuine availability for development. To continue to allocate such a site for residential development therefore results in the Plan being unsound. Alternative sites, such as that put forward by our Client, must therefore be considered and brought forward in order to address this deficiency and ensure that the Plan is sound in all respects.

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**4175 Mr Nicholas Parker [3900]****Object*****Summary:***

I object to the development of site PrC3/h14 as this area is a play area for the young children on the estate. If the council is intent on doing something with this small plot of grass, I suggest that the site is levelled by the importing of a quantity of top soil, and reseeded with grass. By levelling the site, the problem of rainwater pooling in the middle of the site during the wet winter months will be eliminated, and the area available for the children to play on for a greater portion of the year. PrC3/h14 covers 2 areas in the Nant y Dderwen estate. The area I have particular concern about is the more western of the 2 areas, and is that area immediately on the right hand side when turning into Nant y Dderwen from the main road leading toward Capel Seion from Drefach.

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**3956 Ms & Mr England & Davies [5102]****Object*****Agent: Evans Banks Planning Limited (Richard Banks) [4967]******Summary:***

Objection to allocated site PrC3/h14 under policy HOM1.

Despite having a historic consent, the application has still failed to contribute towards delivering a significant level of housing for the growth area in question. The site clearly has significant questions over its deliverability and genuine availability for development. To continue to allocate such sites for residential development therefore results in the Plan being unsound. Alternative sites, such as that put forward by our Client, must therefore be considered and brought forward in order to address this deficiency and ensure that the Plan is sound in all respects.

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**4042 Davies Richards Developments [5131]****Object*****Agent: Evans Banks Planning Limited (Richard Banks) [4967]******Summary:***

This objection represents the trend of re-allocating undeliverable sites. The site highlighted have seen consents granted on them some time ago, but each has seen little or no evidence of any development since these approvals were issued. There has clearly been no firm interest in developing the site, and therefore its deliverability must be questioned. This does not sit with LDP Procedural Guidance which encourages Local Planning Authorities to only reallocate sites based upon firm evidence of deliverability. The site's allocation results in the Deposit LDP being unsound.

**3652 Landview Developments Ltd [5020] Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

**Summary:**

Having considered the allocations in Cluster 3, in terms of their sustainability level, technical deliverability and recent planning history, we consider that a number will not be brought forward during the Plan period and so will result in the Plan being unsound if it is adopted in its current form. This includes allocation PrC3/h14 Nantydderwen, Drefach

**4563 K, D, E & G Fakes, James, Roberts & Jones [5296] Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

**Summary:**

Despite having historic consents often repeated through extension of time applications the site has failed to deliver a significant level of housing for the growth area in question. To continue to allocate such sites for residential development therefore results in the Plan being unsound.

**Council's Initial Response**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period. Further evidence will be developed as the Plan goes into exam.**

**Action**

**No change to the Plan.**





**Paragraph HOM1: Housing Allocations, PrC3/h15**

*Representation(s)*

**4158 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4285 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**Site is currently under construction and therefore the site will remain allocated within the Plan**

*Action*

**No change to the Plan**



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## Paragraph HOM1: Housing Allocations, PrC3/h17

### *Representation(s)*

**4063 Miss Lowri Thomas [3185]**

**Object**

#### *Summary:*

Dwi'n gwrthwynebu i adeiladu rhwng Bancyberllan a Bronallt ond does dim gwrthwynebiad gyda fi bod 'na fynediad i geir i fyny at y ddatblygiad tu ôl.

I object to building between Bancyberllan and Bronallt but I don't have an objection to an entry for vehicles leading up the development behind.

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### *Council's Initial Response*

**(Mae'r gynrychiolaeth yn cyfeirio at AS/049/023) Anghytuno. Ni gynigir y mynediad y cyfeirir ato yn y gynrychiolaeth fel mynediad ond yn hytrach mae'n rhan o gynllun y safle.**

**(This representation refers to AS/049/023) Disagree. The access referred to in the representation is not proposed as an access but instead makes up part of the site lay out.**

### *Action*

**Dim newid i'r Cynllun.**

**No change to the Plan.**

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**Paragraph HOM1: Housing Allocations, PrC3/h18**

*Representation(s)*

**3094 Mr D W Taylor [4823]**

**Object**

*Summary:*

Proposals for housing development on this site are unsound. A number of concerns are cited - most notably in relation to access/traffic issues and parking. It is also claimed that this site should have formed the location of the new school for Gorslas. Therefore, Policy HOM1 is objected to due to the fact that candidate site SR/067/010 is allocated for housing in the deposit Plan under site reference PrC3/h18.

**4257 - RSAI - [4993]**

**Object**

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

*Summary:*

The site has been identified to deliver housing in the 10 to 15 year timeframe. We question why so much time is required to deliver a fairly small scheme. The Council's Candidate Site Assessment states that "Additional information will be sought as necessary as the LDP progresses towards examination to identify when the site is likely to be brought forward." We assert that information about the deliverability of the site should be presented now to understand why the long timescale is required, otherwise sites that have provided this information should be prioritised. Reference is made to rep 4243 where the client's site is promoted.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. Further evidence will be developed as the Plan goes in to examination.**

*Action*

**No action to be taken**

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*Representation(s)*

**3993 Westacres (- Westacres -) [5116] Object**

**Agent: Asbri Planning Limited (Mr Richard Bowen) [591]**

*Summary:*

Objection to Policy HOM1 - seeks an increase to the area of housing allocation PrC3/h18.

The proposed housing land allocation under Candidate Site Reference PrC3/h18 which provides for the development of the site for an indicative number of 29 units is initially welcomed.

Notwithstanding the above, this submission therefore objects to the Deposit Plan on the grounds that the larger area of land should be included as a housing land allocation PrC3/h18. A Sustainability Assessment (SA) is provided at Appendix F which shows that the development of the site would meet the Deposit Plan SA objectives.

*Council's Initial Response*

**Disagree. The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**In relation to the adjacent parcel of land, it is considered that there is sufficient and more suitable land available within the village to accommodate its housing need.**

**The authority will be in contact with the respondent regarding further evidential work.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, PrC3/h19**

*Representation(s)*

**4159 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4286 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**Site is currently under construction, therefore it will remain allocated within the Plan.**

*Action*

**No action needed**



## Paragraph HOM1: Housing Allocations, PrC3/h20

### Representation(s)

**3949 Landview Developments [5100]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

**Summary:**

Objection to allocated site PrC3/h20 under policy HOM1.

Despite having historic consents, each of the applications has still failed to contribute towards delivering a significant level of housing for the growth area in question. The site clearly has significant questions over its deliverability and genuine availability for development. To continue to allocate such sites for residential development therefore results in the Plan being unsound. Alternative sites, such as that put forward by our Client, must therefore be considered and brought forward in order to address this deficiency and ensure that the Plan is sound in all respects.

**4392 Mr A Pritchard [5153]**

**Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

**Summary:**

Objection to the inclusion of PrC3/h20 in the Deposit Revised LDP under policy HOM1

**3957 Ms & Mr England & Davies [5102]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

**Summary:**

Objection to allocated site PrC3/h20 under policy HOM1.

Despite having historic consents, each of the applications has still failed to contribute towards delivering a significant level of housing for the growth area in question. The site clearly has significant questions over its deliverability and genuine availability for development. To continue to allocate such sites for residential development therefore results in the Plan being unsound. Alternative sites, such as that put forward by our Client, must therefore be considered and brought forward in order to address this deficiency and ensure that the Plan is sound in all respects.

**4051 Evans Banks Planning Limited (Mr Jason Evans) [2988]**

**Object**

**Summary:**

The site has been allocated in previous Development Plans and it is proposed to continue to be allocated for 42 dwellings in the Deposit LDP. The site has seen some piecemeal development since its first allocation, amounting to the granting of planning permission for a handful of units in the last 10+ years. However, the vast majority of the site has not benefited from any form of planning consent for a period much longer than this. There has clearly been no firm interest in developing the site, and therefore its deliverability must be questioned. The site's allocation results in the Deposit LDP being unsound.

**4385 Lady Julie Romani [817]**

**Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

**Summary:**

Having considered the allocations in Cluster 3, in terms of their sustainability level, technical deliverability and recent planning history, we consider that a number will not be brought forward during the Plan period and so will result in the Plan being unsound if it is adopted in its current form. This includes allocation PrC3/h20 Land north of Maespode, Llandybie.

4160	<b>Persimmon Homes West Wales (Stuart Phillips) [5154]</b>	<b>Object</b>
<b>Agent: WYG PLANNING &amp; ENVIRONMENT (Louise Darch) [598]</b>		
<b>Summary:</b> The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 11-15 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.		
4014	<b>Mr B Owen [5118]</b>	<b>Object</b>
<b>Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]</b>		
<b>Summary:</b> Objection to the allocation of site PrC3/h20 under policy HOM1 - Clearly has significant questions over its deliverability and genuine availability for development. To continue to allocate such a site for residential development therefore results in the Plan being unsound. Alternative sites, such as that put forward by our Client, must therefore be considered and brought forward in order to address this deficiency and ensure that the Plan is sound in all respects.		
4043	<b>Davies Richards Developments [5131]</b>	<b>Object</b>
<b>Agent: Evans Banks Planning Limited (Richard Banks) [4967]</b>		
<b>Summary:</b> Planning permission was last granted in 2014 for 289 dwellings (outline) and this has lapsed. Whilst the landowners sought to vary conditions upon that permission to extend the validity of the outline permission (approved in October 2019) this does little to display any real progress in the deliverability of the site (reference is made to the phasing plan). In spite of the planning history, thirty years of Development Plan allocations have elapsed without any signs of delivery of this site and more physically challenging sites in the area, such as the re-development of the Betws Colliery site, have come forward long before this site. Reference is made to other sites omitted from the Deposit LDP (inc LDP site GA3/h23 which has an outline planning permission) - yet this site remains in the deposit Plan and therefore the LDP is shown to be even more inconsistent, as it does not sit with LDP Procedural Guidance which encourages Local Planning Authorities to only reallocate sites based upon firm evidence of deliverability. The site's allocation results in the Deposit LDP being unsound.		
3653	<b>Landview Developments Ltd [5020]</b>	<b>Object</b>
<b>Agent: Evans Banks Planning Limited (Richard Banks) [4967]</b>		
<b>Summary:</b> Having considered the allocations in Cluster 3, in terms of their sustainability level, technical deliverability and recent planning history, we consider that a number will not be brought forward during the Plan period and so will result in the Plan being unsound if it is adopted in its current form. This includes allocation PrC3/h20 Land north of Maespode, Llandybie.		

4564 K, D, E & G Fakes, James, Roberts & Jones [5296] Object

Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]

Summary:

Despite having historic consents often repeated through extension of time applications the site has failed to deliver a significant level of housing for the growth area in question. To continue to allocate such sites for residential development therefore results in the Plan being unsound

4287 Persimmon Homes West Wales (Stuart Phillips) [5154] Object

Agent: WYG PLANNING & ENVIRONMENT (Louise Darch) [598]

Summary:

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 11-15 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

Council's Initial Response

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. Further evidence will be developed as the Plan goes into exam.

Action

No change to the Plan.





## Paragraph HOM1: Housing Allocations, PrC3/h22

### Representation(s)

**4527 J Eirian Thomas [2907]**

**Object**

**Summary:**

Objection to the inclusion of site PrC3/h22. Been allocated for a long period of time but not actively being brought forward

**4204 Persimmon Homes West Wales (Stuart Phillips) [5154]**

**Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4322 Persimmon Homes West Wales (Stuart Phillips) [5154]**

**Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4062 Mr Phil Mann [2574]**

**Object**

**Agent: Mr Stuart Owen [731]**

**Summary:**

We seek the exclusion of site PrC3/h22. Apart from an access road to safeguard 'a start' there has been no development since its allocation in the extant LDP, nor since its grant of planning permission in April 2015. It is clearly inappropriate that in a recognised Growth Area such as Penygroes, acknowledged by a proposed housing allocation of 290 units, 256 of those are on just 2 sites which between them have so far realised just 10 dwellings.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The site has planning permission, therefore the principle of development on this site has been established.**

*Action*

**No change to the Plan.**



## Paragraph HOM1: Housing Allocations, PrC3/MU1

### Representation(s)

4248 - RSAI - [4993]

Object

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

#### Summary:

This site was allocated in the previous LDP for 250 dwellings. It was also allocated in some form in the previous UDP and before then the Dinefwr Local Plan. Various planning permissions and variations have occurred over the years since the early 2000s. Despite this, only 9 dwellings have been completed on site. We understand that full planning permission (E29521) is in place since 2014 for the development of a further 70 dwellings but development has not been forthcoming, highlighting that there is a deliverability issue for this site. The LPA's candidate site assessment for this site acknowledges that there is an issue but continues to propose allocation of the site (extract cited and should be referred to). The deliverability of the site is fundamental to the deliverability and effectiveness of the plan. We consider that credible information about the deliverability and viability of the site should be presented now before committing to allocating the site again. If the site cannot demonstrate that it can be delivered then the LPA should identify other sites that can provide the necessary evidence. PPW (Para 4.2.18) states that for housing regeneration sites, where deliverability is considered an issue, planning authorities should consider excluding such sites from their housing supply so that achieving their development plan housing requirement is not dependent on their delivery. We don't consider that this site should be used as a component to meet the housing requirement. The site should either be removed from the LDP or identified as a housing led regeneration site that does not form part of the supply to meet the housing requirement. Reference is made to representation 4267 (policy sg1) Reference is also made to rep 4243 (policy HOM1) where the client's site is promoted.

4061 Mr Phil Mann [2574]

Object

**Agent: Mr Stuart Owen [731]**

#### Summary:

The allocation, PrC3/MU1, has a proposed figure of 177 residential units. The site has benefited from planning permission for more than 20 years, and in that time only 10 dwellings have been built. It is clearly inappropriate that in a recognised Growth Area such as Penygroes, acknowledged by a proposed housing allocation of 290 units, 256 of those are on just 2 sites which between them have so far realised just 10 dwellings. Whilst there is a clear and obvious argument for the site's regeneration, the housing allocation could be reduced facilitating the inclusion of smaller, readily available sites.

4526 J Eirian Thomas [2907]

Object

#### Summary:

Objection to the inclusion of site PrC3/MU1. Been allocated for a long period of time but not actively being brought forward.

*Council's Initial Response*

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. Further evidence will be developed as the Plan goes into examination.

*Action*

No change to the Plan.

**Paragraph HOM1: Housing Allocations, PrC3/h26**

*Representation(s)*

3831 Mr & Mrs John [3618]

Support

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Welcome the decision of the Authority to concur with the representations previously made in relation to our Clients land. We can also confirm that the land continues to not face any ecological, flood risk related, highway, infrastructure or land ownership constraints that would restrict its ability to be delivered during the Plan period. In fact, our Clients have already been approached by a number of parties expressing a keen interest in developing the site once the Plan is adopted. We therefore fully support the decision of the Authority to include the land within the development limits of Saron as part of the Deposit LDP.

*Council's Initial Response*

Support Welcomed.

*Action*

No change to the Plan.

**Paragraph HOM1: Housing Allocations, PrC3/h27**

*Representation(s)*

**4380 Lady Julie Romani [817] Support**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Support the inclusion of part of Candidate Site representation SR/149/002 - LDP site reference (PrC3/h27)

The Candidate Site forms a logical extension to the existing settlement, and lies within close proximity and walking distance of the existing community services and local facilities. The Site will also benefit from well served excellent public transport links to the nearby settlements, including the larger town of Ammanford.

With the Site having no access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints, its delivery if allocated is assured.

*Council's Initial Response*

**Support Welcomed**

*Action*

**No change to the Plan.**



## Paragraph HOM1: Housing Allocations, PrC3/h28

### Representation(s)

**4205 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4323 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4261 - RSAI - [4993] Object**

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

**Summary:**

The Council's Candidate Site Assessment states that "the site is subject to planning permission, however, further information will be sought as necessary as the LDP progresses towards examination to identify when the site is likely to be brought forward". If the site benefits from planning permission then we question why the site is not being brought forward. Is there an issue to the deliverability of the site? The initial outline planning permission was granted in 2013 and no reserved matters applications have been forthcoming. We suggest that if credible evidence is not presented to demonstrate deliverability then the site should not be reallocated. Evidence has not been provided to demonstrate that a developer will build the site. Reference is made to rep 4243 where the client's site is promoted.

*Council's Initial Response*

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. further evidence will be developed as the Plan goes into examination.

*Action*

No change to the Plan

**Paragraph HOM1: Housing Allocations, PrC3/h30**

*Representation(s)*

**3679 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

Reservations regarding the allocation as it appears to provide important ecological connectivity features. Loss of ecosystem connectivity would be at odds with the fundamental aims of maintaining and enhancing biodiversity and Section 6, Part 1 of the Environment (Wales) Act 2016.

*Council's Initial Response*

The site has a pending application. The respondents comments are duly noted. We will work closely with the landowner and the respondent as the Plan progresses towards examination.

*Action*

No change to the Plan

**Paragraph HOM1: Housing Allocations, PrC3/h31**

*Representation(s)*

**4324 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4484 Cllr Tina Higgins [2920] Object**

*Summary:*

The land referenced PrC3/h31 is land that is off an already large housing estate known as Parc Gwernen which runs off Fforestfach Estate. Residents in Parc Gwernen have experienced flooding over the years. More development will increase the likelihood of further flooding.

**4207 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**The site has full planning permission. Further evidence will be developed as the Plan goes into examination.**

*Action*

**No change to the Plan.**



## Paragraph HOM1: Housing Allocations, PrC3/h32

### Representation(s)

**4578 Welsh Parliament (Mr Lee Waters MS) [5300] Object**

#### *Summary:*

Objection to the inclusion of site PrC3/h32 within the Deposit Revised LDP

**4579 Llanelli Constituency (Nia Griffith MP ) [265] Object**

#### *Summary:*

I would like to lodge my concerns about the above site's inclusion in the County's LDP 2018-2033, as it appears there are fundamental difficulties with the potential development of the site that are insurmountable.

This site includes land which has never been in the LDP before. It is clear that there are two sites here, which should be treated separately, the one where there is already planning permission and building work has started, and this entirely new site which has not been in the LDP before.

Currently, on adjacent land - the area to the rear of Tycroes Road, north of the rugby club - 37 dwellings are being built, for Pobl Housing Association. Access to this site will be via Ffordd y Deri, formerly a cul-de-sac, which is rather narrow. There is no access from this site to the main road, other than through Ffordd y Deri, and this would also apply to PrC3/h32. When the Pobl development has been completed, and the properties are occupied, some 40-60 vehicles will have to use Ffordd y Deri to access the main road. If PrC3/h32 is included for development (for 25 dwellings, as stated in the LDP proposal) another 40+ vehicles will be added to that total.

The number of vehicles owned by residents at Ffordd y Deri numbers is 24. Even with this number, there are road safety concerns about vehicles exiting on to Tycroes Road. Allowing further development at that location will dramatically increase traffic volumes and exacerbate the problem.

Any development should improve conditions for all residents, not worsen them, and although new houses will be required during the lifetime of the new LDP, bringing benefits for many, PrC3/h32 seems completely inappropriate for such development.

**3339 June Evans [4941] Object**

#### *Summary:*

Objects due to the amount of extra traffic it will cause on 'Tycroes Square' (Pontardulais Road/Ammanford Road onto A483). This is an already dangerous junction due to it being a blind corner for traffic coming down the road from M4 and Tycroes School towards Ammanford. There have been 2 accidents on the square itself in the last 2 years, plus four other accidents I have seen in the 200 yards(!!) - Between the school and the square in recent years. I have had police with speed cameras hiding behind my car in my drive to catch speeding traffic, and the police are in co-ordination with Tycroes School and regularly set up a speed trap in conjunction with the school children and teachers in a lesson situation (This happens approximately once a term). The police have told me speed bumps are not permitted on this road due to it being a trunk road to the M4. I can only see more accidents happening if this housing development goes ahead.

**4482 Cllr Tina Higgins [2920]****Object****Summary:**

This area of land, currently a greenfield site, is outside the development limits and is not in the current LDP. The land referenced as PrC3/h32 is not one area of land but two separate areas. One half (the land behind Penygarn Road leading to the Rugby Club) already has planning permission for 37 houses which was granted in December 2019 and is now currently under development. This planning permission was approved with the reason given that the need for social housing allowed for an exemption from the County Council's own policy. This was an exception, not the rule and should not be used to set a precedent to have more development on the other half of the land reference PrC3/h32. Other issues include:

- \* Flooding
- \* Access to the dwellings
- \* Ecology and Environment

**4432 Mr Martin Jackson [5239]****Object****Summary:**

Well being of existing local residents are not considered. The increase in the number of proposed dwellings cannot be accommodated safely in this area. Alternative areas are not properly considered. An alternative brownfield site is clearly more appropriate, causing less disruption to local residents. Attached pdf file provides more detail on the objections.

**3325 Mr Dafydd Evans [4934]****Object****Summary:**

I have lived in Pontardulais Road, Tycroes for 30 years. When I moved in there was going to be a by-pass from "Coopers" junction where Tesco is in Ammanford now. This has never materialised, but the amount of traffic through the village has quadrupled. Therefore, Policy HOM1 is objected to due to the fact that site PRC3/h32 is allocated for housing in the deposit Plan.

**4447 Mr Ian Evans [5245]****Object****Summary:**

Objects to site PPrC3/h32 on the basis there should be 2 separate sites, one currently being developed and an additional parcel of land namely a steeper sloped green field area which will pose considerable additional traffic to an already dangerous junction, that alternate brown field sites are available in the area and drainage and sewerage will be difficult to connect to services. Further information is provided by the respondent.

**4430 Mrs Julie Davies [5237]****Object****Summary:**

The respondent objects to the allocation Prc3/h32 citing as series of constraints, impacts and consideration including: the scale of impact on local infrastructure, significantly increased traffic volumes and road safety implications, environmental and ecological impacts, detrimental impact on residents of Ffordd y Deri, the sites current exclusion from the adopted LDP, its greenfield nature, lack of consultation, highway capacity. Further information is provided by the respondent.

**4431 Mr Simon Case [5232]****Object****Summary:**

Please find objection comments in the attached letter.

**4446 Mr Ian Evans [5245]****Object***Summary:*

Objects to site PrC3/h32 - it has been placed as one site but should be 2 sites as development has been approved and is currently taking place on part of the site. The additional area, a steeper greenfield site would attract considerable traffic to an already dangerous junction, is not in keeping with the current houses and will pose difficulty dealing with foul water and sewerage. Further information is provided by the respondent.

**4479 Chris & Rachel Landers [5242]****Object***Summary:*

Objection to the inclusion of site ref PrC3/h32 within the Deposit Revised LDP

**4480 Pat Walters [5257]****Object***Summary:*

Objects to the inclusion of site ref PrC/h32 within the Deposit Revised LDP. Cause severe strain to local infrastructure, the road traffic volume will increase considerably, the current road safety conditions entering and leaving Ffordd y Deri on to Tycroes Road is a genuine and real concern. Environmental and ecological impact also a concern.

**4448 Mr Ian Evans [5245]****Object***Summary:*

Objects to site PrC3/H32 on the basis there should be 2 separate site applications as one area is already being developed, the additional area is a steeper sloped greenfield site which will pose additional traffic to an already dangerous junction, and will have difficulty dealing with rainwater and sewerage. Further information is provided by the respondent.

**4445 Mrs Andrea Dale [5243]****Object***Summary:*

The respondent objects to the allocation PrC3/h32 citing the following: 1. The site should not be considered part of the existing allocation as currently being developed and challenges the use of a greenfield location, 2. Traffic and access issues onto a narrow road, any further traffic would be unsuitable and dangerous, 3. Access onto Tycroes Road - states that the access is already difficult and that this would exacerbate the situation, 4. Further disruption to residents - references wellbeing implications, 5. Destruction of hedgerows and trees, 6. Land was previously not in the adopted LDP and questions why alternative brownfield locations were not considered.

*Council's Initial Response*

**Comments Noted.**

The allocation of site PrC3/32 has been undertaken in accordance with the site assessment methodology and is reflective of the settlement's status within the Ammanford/Cross Hands Growth Area. As part of the assessment a detailed site proforma was prepared and is available as part of the Revised LDP documentation on the Councils website. It should be noted that the identification and allocation of the site was undertaken in accordance with national guidance, reference should also be had to the Plans supporting evidence including that relating to infrastructure.

Part of the site to the rear of Capel Moriah has an established planning permission for 37 affordable units. Information has been provided by the landowner/developer in relation to site delivery within the Plan period, however further information will be sought where required ahead of examination.

In relation to those respondents' comments on the identification of the site as a single allocation, this in no way precludes the consideration of components of the site at a later date incl. at planning application stage.

*Action*

**No change to the Plan**

*Representation(s)*

**3814 Mr C Jenkins [3627]**

**Support**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Welcome the decision of the Authority to concur with the representations previously made in relation to our Clients land. It should be noted that since the submissions were made on behalf of our Client, planning permission has been granted for 37 affordable units on the westernmost enclosure and construction of these is now underway. We can also confirm that that the remainder of the land continues to not face any ecological, flood risk related, highway, infrastructure or land ownership constraints that would restrict its ability to be delivered during the Plan period.

*Council's Initial Response*

**Support Welcomed**

*Action*

**No change to Plan**

**Paragraph HOM1: Housing Allocations, SeC9/h1**

*Representation(s)*

**4208 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-15 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4325 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-15 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The site has reserved matters planning permission for 9 dwelling houses, some of which have been completed. The principle of development on this site has been established.**

**The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**It is considered that there is sufficient evidence show that the site is able to be delivered within the Plan period.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, SeC10/h1**

*Representation(s)*

**4210 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4326 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

**No change to the Plan.**

*Action*

**No change to the Plan.**

**Paragraph HOM1: Housing Allocations, SeC10/h2**

*Representation(s)*

**4327 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4217 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**The site has planning permission and is under construction, with only a few units remaining at the time of writing. It is considered that there is sufficient evidence to prove the site is able to be delivered within the Plan period.**

*Action*

**No change to the Plan.**

## Paragraph HOM1: Housing Allocations, SeC10/h4

### Representation(s)

**3313 Mr Malcolm Bentley [4912]**

**Object**

#### *Summary:*

The planning and access has been refused on a number of occasions due to Tirycloed road being an unsuitable road for access. Tirycloed road is not suitable as an access road to a larger, it already struggles to cope as the footpaths are small and non existent in sections. Parking is extremely difficult as both sides of the street park on right side, the same side as the proposed access. There is no other possible access than the one proposed and that itself would lead to it being a closed/blind junction as the houses are so close to the road

**3287 Mr Alan Ball [4905]**

**Object**

#### *Summary:*

The following has to be taken into consideration:

Demolition of houses on Tirycloed Road - many cars parked in road at all times, noise, length of time to demolish, lorries taking rubble away - how many and how will they turn, working hours/days

**4021 Mr Mark Vickers [5128]**

**Object**

#### *Summary:*

Objection to the allocation of SeC10/h4 under policy HOM1.

I note that the proposed development of the Amman Valley Maternity hospital appears to be at odds with a number of the LDP stated aims. A number of concerns are immediately obvious. In particular, environmental concerns (that have previously been raised), appear to prevent the proposed development in its current form. These include (but are not limited to) the following points:

The Bat survey carried out by the developers being wholly inadequate and failing to identify the presence of bats in the vicinity;

The presence of endangered species on the site;

The impact on flood damage being caused to properties due to the dramatic increase in hard standing and Tarmac areas.

**3390 Dr John Studley [4959]**

**Object**

#### *Summary:*

Objection to housing allocation SeC10/h4 in Glanamman:

Such a large project will almost certainly have a negative socio-psychological impact on the area and will probably depress house prices.

Tirycloed Road is already very busy and the proposed plan will only exacerbate the problem.

You are supporting the destruction of our rural idyll and replacing the largely rural panorama we enjoy with a "concrete jungle". You are undermining our wellbeing and happiness.



**4090 Cwmamman Town Council (Mr D Davies) [30]**

**Object**

*Summary:*

I wish to highlight the strong feelings of Glanamman Town Council and local residents to the allocation of the Glanamman Hospital site for housing in the Deposit Revised LDP (reference SeC10/h4). The Council has opposed this proposal since the early stages of the LDP.

In relation to the Site Allocation Assessment for the site, it is felt that there are some errors in the appraisal process and the Council wishes to offer a number of observations on the content of the assessment.

The Town Council would wish that it's strong objection to this allocation is noted by Carmarthenshire CC and that it is removed from the LDP.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.**

**A planning application for a housing development is currently being considered on the site in which all matters, including highways, ecology and local amenity, are being addressed.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

**No change to the Plan.**

*Action*



## Paragraph HOM1: Housing Allocations, SeC11/h1

### Representation(s)

- 4328 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**
- Agent:**  
**WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**
- Summary:**  
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.
- 
- 4263 - RSAI - [4993] Object**
- Agent: Lichfields (Mr Arwel Evans) [3166]**
- Summary:**  
The Council's Candidate Site Assessment states that "Additional information will be sought as necessary as the LDP progresses towards examination to evidence the site's financial viability and to identify when the site is likely to be brought forward." The site has not passed question C26 (Deliverable and Financially Viable). We therefore question how the Council can propose that the site is allocated when insufficient evidence has been provided in relation to its deliverability, especially when the Council is asserting that some of the dwellings will come forward in the 0-5 year timescale. Reference is made to rep 4243 where the client's site is promoted.
- 
- 4218 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**
- Agent:**  
**WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**
- Summary:**  
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. Further evidence will be developed as the Plan goes into examination.

*Action*

**No change to the Plan**



*Representation(s)*

**4414 Sauro Homes Limited (Peter Sauro) [5168] Support**

**Agent: Asbri Planning Limited (Mr Richard Bowen) [591]**

*Summary:*

The proposed housing land allocation under Candidate Site Reference SeC11/h1 which provides for the development of the site for an indicative number of 55 units, is supported, as is the overall soundness of the Plan.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, SuV25/h1**

*Representation(s)*

**4329 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

**Summary:**  
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4219 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

**Summary:**  
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**At the time of the publication of the Deposit Revised LDP the site has encouraging planning history and recently acquired permission for 47 dwellings.**

*Action*

**No action needed, the site will remain allocated within the Plan**



**Paragraph HOM1: Housing Allocations, SuV26/h1**

*Representation(s)*

**4220 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 4060. This can be found within the Council's responses to comments made in regards site SuV26/h1 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation number 4143 can be found under the Council's response to representations made under policy sp3. The Council's response to representation number 4142 can be viewed under the Council's HOM1 policy responses).**

*Action*

**No Change to the Plan.**



*Representation(s)*

**4330 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 4060. This can be found within the Council's responses to comments made in regards site SuV26/h1 - HOM1 - Housing Allocations.**

**(Cross referencing note - the Council's response to representation number 4276 can be found under the Council's response to representations made under policy sp3. The Council's response to representation numbers 4272 and 4275 can be viewed under the Council's HOM1 policy responses).**

*Action*

**No change to the Plan.**



*Representation(s)*

**4076 Mr & Mrs Barney & Pat Gill [4820]**

**Object**

*Summary:*

This is the site of a former toxic waste tip and is totally unsuitable for any development. This landfill site received waste from the Borough of Llanelli from 31st December 1959 to 31st December 1975. According to the Environment Agency site details (May 2012) all five types of waste have been buried in this landfill site over this period, including hazardous waste. (attachments/copies provided).The land was used to bury large amounts of asbestos. The Environment Agency took samples from the boundary ditch between this proposed development land and the adjacent land opposite Trem - y - Dderwen and stated that this land should be left undisturbed due to the toxic elements dumped at this former waste tip and bound up in the soil. They are of the opinion that provided the land was left intact the potential for serious pollution of the River Gwili would be minimised. Concerns are therefore focused upon the history / former uses on the site. This is a objection for the retention of the site as a housing allocation under policy HOM1.

*Council's Initial Response*

**Comments noted.**

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for the housing needs of this settlement.**

**Reference should be made to the Council's response to representation reference number 4060. This can be found within the Council's responses to comments made in regards site SuV26/h1 - HOM1 - Housing Allocations.**

*Action*

**No change to the Plan**



*Representation(s)*

**4060 Anton Developments (Anton Developments) [5132] Support**

**Agent: Asbri Planning Limited (Mr Richard Bowen) [591]**

*Summary:*

Supports the inclusion of allocated site SuV26/h1 under policy HOM1. This submission seeks to demonstrate that the site is deliverable in terms of the residential development proposed.

*Council's Initial Response*

**Comments noted/support welcomed.**

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for the housing needs of this settlement.

The Council is confident in the deliverability of this site. Further communication from the respondent/agent (October 2020) states that it is the intention of Anton Developments Ltd is to develop the site in accordance with the timescales set out in the Deposit Plan's Housing Trajectory and notes that the site benefits from a full permission (subject to conditions) for the installation of all service roads and drainage to create a fully serviced site.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP - however the progress already made is noted (see above).

*Action*

**No change to the Plan**

**Paragraph HOM1: Housing Allocations, SuV27/h1**

*Representation(s)*

**4100 Daley Homes [5140] Support**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Supports the inclusion of SuV27/h1 and Exclusion of current allocation SC34/h1 under HOM1.

Please note: reference to PrC3/h26 on rep form is in error, agent has confirmed this. Please ignore.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, SuV30/h1**

*Representation(s)*

**4331 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4221 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, SeC12/h3**

*Representation(s)*

**4223 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-15 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4332 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-15 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to, and in a manner consistent with the Sustainability Appraisal. As part of this assessment process a detailed site pro forma has been prepared. The allocation, along with the others within Newcastle Emlyn, makes sufficient provision for the housing needs of this settlement.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, SeC13/h1**

*Representation(s)*

**4224 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-15 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4333 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-15 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3310 Amanda Arter [834] Support**

**Agent: Geraint John Planning Ltd (Mr Luke Grattarola) [685]**

*Summary:*

The site within our client's ownership has been allocated under site reference Sec13/h1 for residential development. We fully support this policy and allocation while also encouraging an extension of the land included.

*Council's Initial Response*

**Support is welcomed.**

*Action*

**No change to the Plan.**

**Paragraph HOM1: Housing Allocations, SeC13/h2**

*Representation(s)*

**3905 N/A Trustees of Highmead Estate [5088] Support**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

We support the decision of the Authority to include the land within the development limits of Llanybydder as part of the Deposit LDP. We can also confirm that the land continues to not face any ecological, flood risk related, highway, infrastructure or land ownership constraints that would restrict its ability to be delivered during the Plan period.

*Council's Initial Response*

**Support is welcomed.**

*Action*

**No change to the Plan.**

**Paragraph HOM1: Housing Allocations, SeC13/h3**

*Representation(s)*

**4225 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-15 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4334 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-15 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to, and in a manner consistent with the Sustainability Appraisal. As part of this assessment process a detailed site pro forma has been prepared. The allocation, along with the others within Llanybydder, makes sufficient provision for the housing needs of this settlement.**

*Action*

**No change to the Plan.**

**Paragraph HOM1: Housing Allocations, SeC14/h2**

*Representation(s)*

**4336 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-15 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4228 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

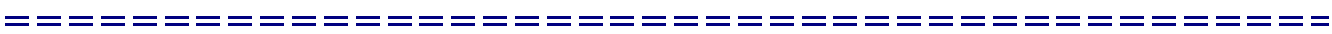
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-15 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to, and in a manner consistent with the Sustainability Appraisal. As part of this assessment process a detailed site pro forma has been prepared. The allocation, along with the others within Pencader, makes sufficient provision for the housing needs of this settlement.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, SeC14/h3**

*Representation(s)*

**3992 Mrs Lynn C C C Bushin [4817]**

**Object**

*Summary:*

I wish to object to this site being included in the Deposit LDP. This site is incorrectly named & identified - There are three areas in close proximity that are called "Glanawmor" in the village of Pencader. The proposed site currently makes up part of the holding of Glanawmor Uchaf Farm and should be identified as such.

The plan supplied by the applicants to identify this site shows two fields and does not show the full extent of the land and buildings owned by the applicants, and by its omission is erroneous and misleading. The full extent of the land in ownership of the applicant and its current use should be taken in account when making this decision to include a site in the LDP.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. In respect of the objection to the name of the site, the name isn't derived from the farm holding it is located in, it is merely for identification purposes, and the name of "Glanmawmor" is considered to be appropriate. Objections are made that in allocating the site, the full extent of the land in the ownership of the applicant should be considered. All relevant information is taken into account when allocating a site.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, SeC14/h4**

*Representation(s)*

**4226 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4335 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to, and in a manner consistent with the Sustainability Appraisal. As part of this assessment process a detailed site pro forma has been prepared. The allocation, along with the others within Pencader, makes sufficient provision for the housing needs of this settlement. Contact has been made with the landowner who has confirmed that the site is deliverable during the Plan period.**

*Action*

**No change to the Plan.**





**Paragraph HOM1: Housing Allocations, SuV31/h1**

*Representation(s)*

**4229 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

**Summary:**  
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4337 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

**Summary:**  
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to, and in a manner consistent with the Sustainability Appraisal. As part of this assessment process a detailed site pro forma has been prepared. The allocation, along with the others within Drefach Felindre, makes sufficient provision for the housing needs of this settlement. Contact has been made with the landowner who has confirmed that the site is deliverable during the Plan period.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, SuV32/h1**

*Representation(s)*

**4230 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4338 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

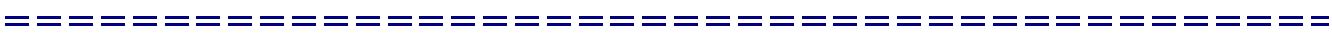
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to, and in a manner consistent with the Sustainability Appraisal. As part of this assessment process a detailed site pro forma has been prepared. The allocation makes sufficient provision for the housing needs of this settlement. Furthermore, the site has the benefit of Reserved Matters Permission.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, SuV33/h1**

*Representation(s)*

**3372 Mr J Davis [672]**

**Object**

*Summary:*

Please refer to attachment for reasons for objection.

LPA's summary:

An objection is made to site SuV33/h1 being included in the LDP for a number of reasons including:

- this cluster where the development land for housing is proposed is in isolation from the key settlement areas of SC2 and it's facilities and amenities;
- The boundary illustrated at the east side of this site is part of Ty Newydd and the owners will not relinquish this section of land for development.
- There is no safe pedestrian access to the key settlement areas.

**3195 Mr Andrew Bray [3451]**

**Object**

*Summary:*

The proposal by JCR Planning is not deliverable as the development on the submitted plan extends beyond SUV33/h1 on the southern border. A large parcel of the proposed development land on the east of the site belongs to myself and I would not want this developed. Due to the reasons given above the site would not accommodate 5 dwellings or the access road. Visibility onto the A484 would be poor due to the bend. The development would detract from the Welsh hamlet feel of the village and become another ribbon development like Saron and Rhos.

*Council's Initial Response*

**It is considered that the site is appropriate for residential use, however, in light of the objection relating to part of the site in the ownership of the objector, this element will be removed from the allocation but remain within the development limits.**

*Action*

**Remove part of the allocation that is owned by the objector, but retain within the development limits.**

*Representation(s)*

**3822 Mr W O Ponsonby-Lewes [3837]**

**Support**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Our clients support the inclusion of site SuV33/h1 as a housing allocation under policy HOM1.

*Council's Initial Response*

**Support is welcomed. However, in light of the objection relating to part of the site in the ownership of another party who does not wish to develop the land, this element will be removed from the allocation but remain within the development limits.**

*Action*

**Remove part of the allocation that is owned by another party, but retain within the development limits.**

**Paragraph HOM1: Housing Allocations, SuV34/h1**

*Representation(s)*

**4232 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:**  
**WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

**Summary:**  
 The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4340 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:**  
**WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

**Summary:**  
 The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4056 Evans Banks Planning Limited (Mr Jason Evans) [2988] Object**

**Summary:**  
 Allocated in current LDP but has not been the subject of any pre-application enquiry or formal planning application since its allocation in the current LDP, adopted in 2014. It was also not promoted as being available for development by the land owner during the Candidate Site Stage of the preparation of the emerging LDP. As a result, there is no clear or indeed any indication that the land in question is available for development and so therefore its delivery during the Plan period is in serious question. The site's allocation results in the Deposit LDP being unsound.

*Council's Initial Response*

**The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to, and in a manner consistent with the Sustainability Appraisal. The allocation makes sufficient provision for the housing needs of this settlement. Contact has been made with the landowner who has confirmed that the site is deliverable during the Plan period.**

*Action*

**No change to the Plan.**

## Paragraph HOM1: Housing Allocations, SuV35/h1

### Representation(s)

**4234 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4057 Evans Banks Planning Limited (Mr Jason Evans) [2988] Object**

**Summary:**

Allocated in current LDP and in a number of previous development plans - failed to deliver any residential units during this time - 20 years. Previous planning application activity on the A484 frontage is noted, but as previous evidence submitted to the Authority highlights, this has not been positive due to access constraints - and has in fact identified that residential development at this location is not possible to be delivered. The site's allocation results in the Deposit LDP being unsound.

**4339 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:**

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

**Summary:**

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

### Council's Initial Response

**The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to, and in a manner consistent with the Sustainability Appraisal. The allocation makes sufficient provision for the housing needs of this settlement. Contact has been made with the landowner's agent who has confirmed that the site is deliverable during the Plan period.**

### Action

**No change to the Plan.**

**Paragraph HOM1: Housing Allocations, SuV37/h1**

*Representation(s)*

**4144 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

**Summary:**  
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4277 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

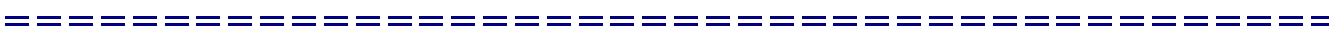
**Summary:**  
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to, and in a manner consistent with the Sustainability Appraisal. The allocation, along with the others within Cwmann, makes sufficient provision for the housing needs of this settlement. An outline planning application has been submitted on the site and is awaiting determination (ref: W/32329).**

*Action*

**No change to the Plan.**



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**Paragraph HOM1: Housing Allocations, SuV37/h2**

*Representation(s)*

**3145 Barton Willmore (Joe Ayoubkhani) [646]**

**Support**

*Summary:*

Support is given to the housing allocation SuV37/h2 Land south of Cae Coedmor.

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*Council's Initial Response*

**Support is welcomed.**

*Action*

**No change to the Plan.**



## Paragraph HOM1: Housing Allocations, SuV38/h1

### Representation(s)

- 4433 Mr M Thomas [5059] Object**  
**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**  
**Summary:**  
 Site SuV38/h1 should be omitted from the LDP and an alternative site included in its place. There have not been any planning applications on the site during the last Plan period. It has been allocated since the UDP, for over 17 years and has not shown any signs of delivery.
- 
- 3064 Mr Nick Hopkins [2887] Object**  
**Summary:**  
 SuV38/h1 - As usual where does the council think the employment, transport links, shopping and amenities and healthcare provision will come from. The Council can barely provide a functional service in these local communities such as Capel Iwan - no banks, no shops, no post office, no school, no healthcare. The council is in cloud cuckoo land if it thinks anyone will want to move to or stay in these areas without any sort of service provided.
- 
- 4235 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**  
**Agent: WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**  
**Summary:**  
 The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.
- 
- 4341 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**  
**Agent: WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**  
**Summary:**  
 The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.
-



**3942 Evans Banks Planning Limited (Richard Banks) [4967] Object**

*Summary:*

We object to the inclusion of SuV38/h1 within the Deposit LDP. The site, of 11 units remains wholly undeveloped, and we have noted from a check of the Council's planning application records that there are no applications to develop the site in the last Plan Period. It was also allocated with the Carmarthenshire Unitary Development Plan (2003), and LDP in 2014, and despite being allocated in Development Plan for over 17 years has not shown any signs of delivery. We submit that this site has showing no impetus to be developed and satisfy local housing need, and it should be omitted from the new LDP, and Alternative Site promoted and included in its place.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The site is considered to be a reasonable development opportunity within Capel Iwan for small to medium scale housebuilders. The site was submitted as a candidate site and as such, the agent has provided evidence showing its viability .**

*Action*

**No change to the Plan.**

**Paragraph HOM1: Housing Allocations, SuV38/h2**

*Representation(s)*

**3201 Mr Lawrence Aldridge [495] Object**

*Summary:*

Objects to the allocation of site SuV38/h2 for residential development. The issues cited include determinantal impact on the character of the village, lack of amenities and population/traffic impact. It is stated that there is plentiful provision of building plots which are not being delivered. This representation is therefore objecting to policy HOM1 of the Deposit Plan in that the site is allocated for residential development.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

*Action*

**No change to the Plan.**

**Representation(s)**

**3907 Mr K Thomas [4041]**

**Support**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

**Summary:**

Our clients wholeheartedly welcome the decision of the Authority to concur with the representation previously made in relation to our Clients land and fully support their decision to include the land as an Allocated Residential Site within the development limits.

**Council's Initial Response**

**Support is welcomed.**

**Action**

**No change to the Plan.**



## Paragraph HOM1: Housing Allocations, SuV39/h1

### Representation(s)

**4410 Mr C Jenkins [3627]**

**Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

#### Summary:

The continued inclusion of site SuV39/h1 as an allocated housing site is questioned, as it has been an allocation since the Carmarthenshire Unitary Development Plan. Whilst we note that an outline planning application has been made by the land owners for 8 units on the site in recent months, this is the only planning history the site has for its entire time as housing allocation. Furthermore, we note that the application has not been made or promoted by a developer and we understand that there are questions and concerns with regard to the delivery of a suitable access to serve the site.

**4342 Persimmon Homes West Wales (Stuart Phillips) [5154]**

**Object**

#### Agent:

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

#### Summary:

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4058 Evans Banks Planning Limited (Mr Jason Evans) [2988]**

**Object**

#### Summary:

Allocated in current LDP and former UDP - failed to deliver any residential units for the last 14 years. From the Deposit LDP, the Authority does not anticipate that it will deliver any new units for a further 4 to 8 years. Outline planning application made by the land owners for 8 units on the site in recent months is noted (this is the only planning history the site has for its entire time as a housing allocation) but this has not been made or promoted by a developer. It is understood that there are questions and concerns with regard to the delivery of a suitable access to serve the site. Significant doubts over the deliverability of the site, its allocation rewards an apathy to delivery and a failure to meet the longstanding and unmet needs of the community, resulting in the Deposit LDP being unsound.

4236 Persimmon Homes West Wales (Stuart Phillips) [5154] Object

Agent: WYG PLANNING & ENVIRONMENT (Louise Darch) [598]

Summary:

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

Council's Initial Response

The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to, and in a manner consistent with the Sustainability Appraisal. The allocation makes sufficient provision for the housing needs of this settlement. Contact has been made with the landowner who has confirmed that the site is deliverable during the Plan period. Furthermore, an outline planning application has been submitted on the site and is awaiting determination (ref: W/39945).

Action

No change to the Plan.

Paragraph HOM1: Housing Allocations, SuV40/h1

Representation(s)

3573 Mr Michael Palmer [3264] Object

Summary:

Planning permission currently exists on sites within the village boundary including for another 10 houses (ie. SuV40/h1) within 100 metres of the two candidate sites SR/156/001 and SR/156/002. For a number of reasons, these have not been progressed, namely:

There is no demand for new houses - two 2 bed starter homes have not been sold in the 8 years we have lived in the village. Moreover, both stood empty for more than 5 years;

The sewage/ drainage system does not have capacity for more dwellings as has been previously discussed in relation to development within the village;

Council's Initial Response

Noted. The allocated site has been reduced in scale within the revised LDP to reflect a development that would be suitable for a village of the size of Trelech.

Further evidential work will be undertaken prior to the examination in to the revised LDP

Action

No change to the Plan.

**Paragraph HOM1: Housing Allocations, SuV41/h1**

*Representation(s)*

**4343 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 11-15 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4237 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 11-15 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to, and in a manner consistent with the Sustainability Appraisal. As part of this assessment process a detailed site pro forma has been prepared. The allocation makes sufficient provision for the housing needs of this settlement.**

*Action*

**No change to the Plan.**

**Paragraph HOM1: Housing Allocations, SuV43/h1**

*Representation(s)*

**4344 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 11-15 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4238 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 11-15 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to, and in a manner consistent with the Sustainability Appraisal. As part of this assessment process a detailed site pro forma has been prepared. The allocation makes sufficient provision for the housing needs of this settlement.**

*Action*

**No change to the Plan.**

**Paragraph HOM1: Housing Allocations, SeC15/h1**

*Representation(s)*

**4345 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4239 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, SeC15/h2**

*Representation(s)*

**3978 Evans Banks Planning Limited (Mr Jason Evans) [2988] Object**

*Summary:*

Allocation SeC15/h2 is clearly detached from the existing urban form of Llandoverly. Furthermore, it is separated by two distinct and strong linear features, namely the A40 Trunk Road and the River Tywi. Both these features and the distance of the site from the existing urban form of Llandoverly result in Allocation SeC15/h2 being detached in nature and clearly not a 'logical' extension of the urban form. On this basis, the consistency of approach with regards to the assessment of sites must be called into question and indeed the soundness of the Plan.

The Plan as it stands does not meet the first test of Soundness and so Allocation SeC15/h2 should be removed.

**4053 Evans Banks Planning Limited (Mr Jason Evans) [2988] Object**

*Summary:*

The allocation is located some distance from the Town of Llandoverly and so not within close proximity of its community facilities and local services. It is in fact clearly detached from the existing urban form of Llandoverly. Furthermore, it is separated by two distinct and strong linear features, namely the A40 Trunk Road and the River Tywi. Both these features and the distance of the site from the existing urban form of Llandoverly result in the allocation being detached in nature and clearly not a 'logical' extension of the urban form. In addition, such detachment and a lack of any pedestrian connection to the allocation from the Town will clearly discourage sustainable modes of transport. On this basis, the consistency of approach with regards to the assessment of sites must be called into question and indeed the soundness of the Plan. The site's allocation results in the Deposit LDP being unsound.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal.**

**This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3980 W D Lewis [4021]**

**Support**

**Agent: Asbri Planning Limited (Mr Richard Bowen) [591]**

*Summary:*

Support for the inclusion of housing allocation Sec15/H2 under policy HOM1.

Further to the candidate site submission Ref SR/081/006), it is noted that the adjacent to Bryndeilog, Tywi Avenue, Llandovery has been allocated for residential development of 8 units under Candidate Site Reference Sec15/h2.

The Deposit Revised Plan is supported on the basis that the Council have accepted the principle of residential uses at the scale proposed and as such WD Lewis accepts the overall soundness of the Plan.

WD Lewis wish to emphasise that their focus is continue to develop the site for residential development in the short to medium term.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, SeC16/h2**

*Representation(s)*

**4346 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 11-15 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4241 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 11-15 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**It is considered that there is sufficient evidence show that the site is able to be delivered within the Plan period.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

*Action*

**No change to the Plan.**



## Paragraph HOM1: Housing Allocations, SeC16/h3

### *Representation(s)*

**3979 Evans Banks Planning Limited (Mr Jason Evans) [2988] Object**

#### *Summary:*

Objection to housing allocation SeC16/h3, seeking the site's removal.

The site does not have any planning history for at least the last 15 years. A key factor in the site not being brought forward previously has been the inability to deliver a means of access off Carmarthen Road to the required standards. The site's frontage with Carmarthen Road is particularly short, with visibility being severely restricted in both directions. There are also no pedestrian footways either side of the site and so it is quite clear that due to access constraints, Allocation SeC16/h3 is therefore technically undeliverable.

The Plan as it stands does not meet the second test of Soundness and so Allocation SeC16/h3 should be removed.

**4071 Evans Banks Planning Limited (Mr Jason Evans) [2988] Object**

#### *Summary:*

Whilst this is a newly allocated site, it has been included within the development limits of Llandeilo under several previous development plans. Despite this, the site does not have any planning history for at least the last 15 years. A key factor in the site not being brought forward previously has been the inability to deliver a means of access off Carmarthen Road to the required standards. The site's frontage with Carmarthen Road is particularly short, with visibility being severely restricted in both directions due to adjoining separate land ownership and a Listed garden wall. There are also no pedestrian footways either side of the site and so it is quite clear that due to access constraints, this allocation is therefore technically undeliverable and so will not contribute to the provision of new housing for the settlement of Llandeilo during the Plan period. The site's allocation results in the Deposit LDP being unsound.

**4054 Evans Banks Planning Limited (Mr Jason Evans) [2988] Object**

#### *Summary:*

Whilst this is a newly allocated site, it has been included within the development limits of Llandeilo under several previous development plans. Despite this, the site does not have any planning history for at least the last 15 years. A key factor in the site not being brought forward previously has been the inability to deliver a means of access off Carmarthen Road to the required standards. The site's frontage with Carmarthen Road is particularly short, with visibility being severely restricted in both directions due to adjoining separate land ownership and a Listed garden wall. There are also no pedestrian footways either side of the site and so it is quite clear that due to access constraints, this allocation is therefore technically undeliverable and so will not contribute to the provision of new housing for the settlement of Llandeilo during the Plan period. The site's allocation results in the Deposit LDP being unsound.

*Council's Initial Response*

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period. It should be noted that the allocation figure set out in the Deposit Plan is considered too low for a site of this size, and consequently the number will be increased as a focused change.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

*Action*

No change to the Plan.



**Paragraph HOM1: Housing Allocations, SuV47/h1**

*Representation(s)*

**4242 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4348 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Part of the site has a reserved matters planning permission. The principle of development on this site has been established. It is considered that there is sufficient evidence show that the site is able to be delivered within the Plan period.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, SuV48/h1**

*Representation(s)*

**4244 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4349 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for the housing needs of this settlement.**

**A planning application for a housing development is currently being considered on the site. Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, SuV51/h1**

*Representation(s)*

**4245 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4350 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.**

**Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.**

**Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.**

*Action*

**No change to the Plan.**



**Representation(s)**

**4107 Mr A Thomas [4025]**

**Support**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

**Summary:**

Support for the inclusion of site SuV51/h1 under policy HOM1. The site is part of formally larger allocation SC30/h1.

In supporting the inclusion of this allocation, the respondent also argues that the remainder of the field should also be included within the LDP (refer to representation reference 4106).

A full description of the (whole) site's development potential and merits has previously been provided in the candidate site submission, to which reference should be made.

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**Council's Initial Response**

**Support welcomed.**

**Action**

**No change to the Plan.**

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## Paragraph HOM1: Housing Allocations, SeC18/h1

### Representation(s)

**3596 Mr N Morgan [5008]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

#### Summary:

Objection to housing allocation SeC18/h1 and seeking the site's removal from Policy HOM1:

In St. Clears, land continues to be allocated at Britannia Terrace for a total of 60 units (Site SeC18/h1), despite being allocated in previous Development Plan without interest being implemented. Outline planning permission was granted in 2010 but has long since lapsed. The southern part of the site now has planning permission to construct a new McDonalds and Costa Coffee development off the A40 roundabout at St. Clears. Residential proposals appear of little interest? These factors must surely question its deliverability as a residential allocation.

**4351 Persimmon Homes West Wales (Stuart Phillips) [5154]**

**Object**

#### Agent:

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

#### Summary:

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-15 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4246 Persimmon Homes West Wales (Stuart Phillips) [5154]**

**Object**

#### Agent:

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

#### Summary:

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-15 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.

The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. The allocation identified within the LDP make sufficient provision for part of the housing needs of this settlement.

*Action*

No change to the Plan.



**Paragraph HOM1: Housing Allocations, SeC18/h2**

*Representation(s)*

**4352 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4247 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**The site has a pending planning application with the LPA.**

**Further evidential work will be provided at the examination in to the revised LDP.**

*Action*

**No change to the Plan**



**Paragraph HOM1: Housing Allocations, SeC18/h3**

*Representation(s)*

**3321 K Wilson [3624]**

**Support**

*Summary:*

Please see supporting documents

*Council's Initial Response*

**Support welcomed. Further evidential work will be undertaken prior to the LDP examination**

*Action*

**No change to the Plan**

**Paragraph HOM1: Housing Allocations, SeC18/h5**

*Representation(s)*

**4075 Mr Wynne & John Walters [3732]**

**Support**

**Agent: Asbri Planning Limited (Mr Richard Bowen) [591]**

*Summary:*

The provision to include the site as a residential allocation in the emerging Deposit Plan is welcomed and supported. The Deposit Revised Plan is supported on the basis that the Council have accepted the principle of residential uses at the scale proposed. It is emphasised that the focus is on developing the site for residential development in the short to medium term.

*Council's Initial Response*

**Support Welcomed.**

**Further evidential work will be provided at the examination in to the revised LDP.**

*Action*

**No change to the Plan**

**Paragraph HOM1: Housing Allocations, SeC18/h7**

*Representation(s)*

**4353 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

**Summary:**  
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4249 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

**Summary:**  
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**It is anticipated that this site will be developed on a plot by plot basis, and provides a development opportunity very different to other allocations within St Clears.**

**Further evidential work will be provided at the examination in to the revised LDP.**

*Action*

**No change to the Plan**



**Paragraph HOM1: Housing Allocations, SeC19/h1**

*Representation(s)*

**3332 Mrs Alison Cook [3132]**

**Object**

*Summary:*

Object strongly to development at Park View, Trevaughan Whitland. TAN15 states surface water can increase water courses - the water courses cannot cope at present with the amount of water. I am a property owner at the edge of the land currently a candidate site and do not want my property jeopardised by more water than we already have passing the property from the land at Park View. This land is between two powerful waterways and floods. Developing this area would have a detrimental affect to current properties - definite flooding and property damage.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**The allocation has not been subject to any objection from infrastructure and statutory consultees.**

**Further evidential work will be provided at the examination in to the revised LDP.**

*Action*

**No change to the Plan**



*Representation(s)*

**3593 Mr N Morgan [5008]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Objection to the exclusion of part of site SR/163/010 (the part that is not allocated under SeC19/h1).

The Candidate Site forms a logical extension to the existing settlement, being well related to the Park View farmyard buildings which serve to screen the majority of the field from public view.

Accordingly, the development of the site would remain more akin in character to the built-up form of Trevaughan, than open pasture to the south and east of the town.

In addition to the above, the site lies within close proximity and walking distance of the existing shops, rail station, community services and local facilities of Whitland which will ensure it makes a positive contribution to both national and local sustainable development objectives.

*Council's Initial Response*

**The allocation of part of this site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**It is also considered that there is little requirement for additional land to meet the housing provision within the town.**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, SeC19/h2**

*Representation(s)*

**3594 Mr N Morgan [5008]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Objection to Whitland Creamery SeC19/h2 & seeking the site's removal from Policy HOM1.

Great emphasis within the Draft Plan has been placed upon the continued allocation of proposed housing site at Whitland Creamery. The site is allocated for 48 residential units as Site SeC19/h2. Within the current LDP (2014-21) the site is wholly allocated for employment purposes. That allocation has remained unfulfilled and undelivered for many years, stretching back to the Carmarthenshire Unitary Development Plan (2003) and Carmarthen District Local Plan (1997). Questions must therefore be posed as to whether the site is capable of re-development due to its historic former uses needing to be remediated.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**The northern side of the site has full planning permission for 28 dwellings and initial works have been undertaken. The southern element is a new allocation.**

**Further evidential work will be provided at the examination in to the revised LDP.**

*Action*

**No change to the Plan**





**Paragraph HOM1: Housing Allocations, SeC20/h1**

*Representation(s)*

**4253 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4355 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**The site is currently under construction, and the agent has provided a development timescale. Further evidential work will be provided at the examination in to the revised LDP.**

*Action*

**No change to the Plan.**



## Paragraph HOM1: Housing Allocations, SeC20/h2

### Representation(s)

- 4251 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**
- Agent:**  
**WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**
- Summary:**  
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.
- 
- 4354 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**
- Agent:**  
**WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**
- Summary:**  
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.
- 
- 3595 Mr N Morgan [5008] Object**
- Agent: Evans Banks Planning Limited (Richard Banks) [4967]**
- Summary:**  
Objection to housing allocation SeC20/h2 and seeking the site's removal from Policy HOM1: The Western Carmarthenshire draft allocations includes parcels of residential allocations in St Clears and Laugharne. In the case of the latter, land continues to be allocated adjacent to Laugharne Primary School for 42 units (Site SeC20/h2) despite being allocated in previous Development Plans, with out any firm implementation on the site. The site does have the benefit of outline planning permission, secured on Appeal, however, has been recently marketed for sale by auction, and apparently without any firm interest.
-

*Council's Initial Response*

The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.

The site was granted outline permission at appeal. Further evidential work will be provided at the examination in to the revised LDP.

*Action*

No change to the Plan.

*Representation(s)*

4528 Mrs Bethan Thomas [2311] Support

*Summary:*  
Provides a historic context to the allocation of the site.

Support the allocation of the site and. will be concentrating on securing these lands giving us great satisfaction to do so.

*Council's Initial Response*

Support Welcomed.

Further evidential work will be undertaken prior to the examination in to the revised LDP

*Action*

No change to the Plan

**Paragraph HOM1: Housing Allocations, SeC20/h3**

*Representation(s)*

**3337 Ms Joanna Legg [4781]**

**Object**

*Summary:*

Objection to the allocation and therefore an objection to policy HOM1. A number of concerns are cited, particularly in terms of archaeological / conservation concerns. Detailed information is submitted to this effect, with site history provided. It was considered a site of Sensitivity of Archaeological Significance by Dyfed Archaeological Trust. Also, it is not appropriate to have a development of 5 large houses, when first time buyers cannot get a foothold on the property ladder. It is also Agricultural land, grade 1. Excellent arable land.

**3272 Charles Mitchell [4900]**

**Object**

*Summary:*

The inclusion of the field off Clifton street, Laugharne would cause serious traffic issues at the point in would joins Clifton st. The field itself is a haven for wildlife- Hawks are often seen and I believe there are rare wild flowers present. On an incline it provides a good soak away for rain water- if that was built on we would see yet more rain water on Clifton street. The sewage works at the moment cannot cope. The health services in laugharne are already stretched.

**3286 Mr C Kirby [4904]**

**Object**

*Summary:*

Residential development should not take place on this site - it should remain agricultural. The site is too steep and the access is problematic which would affect road safety with construction traffic and additional traffic from residents once built would put an unreasonable strain on traffic passing through Laugharne which is already a problem. There is ample more level development sites already in Laugharne which are adjacent to the highway which are much more suitable and accessible. The development would prejudice surrounding properties privacy significantly as it will overlook a number of properties that front Clifton St. the fields at the rear of Clifton street should remain fields. Are there archeological issues here as well? The site adjoins the pilgrims way from St Davids? Therefore, Policy HOM1 is objected to due to the fact that site SeC20/h3 is allocated for housing in the deposit Plan

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**Further evidential work will be provided at the examination in to the revised LDP.**

*Action*

**No change to the Plan**



*Representation(s)*

**3609 Mrs & Mr J & G Brown & Howells [5013]**

**Support**

***Agent: Evans Banks Planning Limited (Richard Banks) [4967]***

*Summary:*

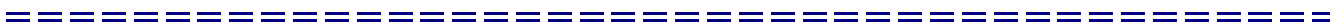
Wholeheartedly welcome the decision of the Authority to concur with the representation previously made in relation to our Clients land and fully support their decision to include the land as a Residential Allocation (ref SeC20/h3) within the development limits. They intend enacting upon this inclusion shortly after the LDP is formally adopted, by means of a formal planning application, and thereafter commence implementation of the development of the site within the early years of the Plan Period.

*Council's Initial Response*

**Support Welcomed. Further evidential work will be undertaken prior to the examination in to the revised LDP**

*Action*

**No change to the Plan.**



**Paragraph HOM1: Housing Allocations, SuV55/h1**

*Representation(s)*

**4254 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4356 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**The site has a pending outline planning application. Further evidential work will be provided at the examination in to the revised LDP.**

*Action*

**No change to the Plan**

**Paragraph HOM1: Housing Allocations, SuV58/h1**

*Representation(s)*

**4357 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4256 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**It is anticipated that this site will be brought forward within the short term.**

**Further evidential work will be provided at the examination in to the revised LDP.**

*Action*

**No change to the Plan**



**Paragraph HOM1: Housing Allocations, SuV58/h2**

*Representation(s)*

**4255 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-15 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4358 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-15 years.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**A new field has been added to the existing allocation in order to support and push forward with the proposal in its entirety.**

**Further evidential work will be provided at the examination in to the revised LDP.**

*Action*

**No change to the Plan.**





**Paragraph HOM1: Housing Allocations, SuV59/h1**

*Representation(s)*

**4258 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

**Summary:**  
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4359 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

**Summary:**  
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-5 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The site has been completed.**

*Action*

**No change to the Plan**



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**Paragraph HOM1: Housing Allocations, SuV59/h2**

*Representation(s)*

**3403 Mr E & M Howells [4038]**

**Support**

***Agent: Asbri Planning Limited (Mr Richard Bowen) [591]***

***Summary:***

Housing Allocation SuV59/h2 is supported.

The Deposit Revised Plan is supported on the basis that the Council have accepted the principle of residential uses at the scale proposed and as such E & M Howells accepts the overall soundness of the Plan. This is confirmed in the attached submission document which seeks to demonstrate that the site is deliverable in terms of the residential development proposed.

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***Council's Initial Response***

**Support Welcomed**

***Action***

**No change to the Plan**



**Paragraph HOM1: Housing Allocations, SuV60/h1**

*Representation(s)*

**4360 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4259 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**Further evidential work will be provided at the examination in to the revised LDP.**

*Action*

**No change to the Plan.**

**Paragraph HOM1: Housing Allocations, SuV61/h1**

*Representation(s)*

**4361 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

**4260 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 6-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**Further evidential work will be provided leading into the examination of the Plan.**

*Action*

**No change to the Plan**

*Representation(s)*

**3097 Mr T Pearce [2802]**

**Support**

**Agent: RPS Planning & Development (Emma Fortune) [681]**

*Summary:*

Support is provided to the allocation of Land at Nieuport Farmyard, Pendine (ref: SuV61/h1), part of which currently benefits from an implemented planning permission for 5 dwellings (ref: 2/21251).

*Council's Initial Response*

**Support Welcomed.**

**Further evidential work will be undertaken prior to the examination in to the revised LDP.**

*Action*

**No change to the Plan.**

**Paragraph HOM1: Housing Allocations, SuV63/h1**

*Representation(s)*

**3084 Llanddowror Community Council (Ms Vicky Mitchell) [42]**

**Object**

*Summary:*

This Council would like it to be a condition of any new housing or accommodation on either existing agreed potential development sites or any new ones to include mandatory work to ensure the sewage system is sufficient for any proposed building or development work. This should be made a condition of any planning approval and should be completed before any dwellings whether houses, lodges or caravans or any variant thereof are built or sited in the area.

Development in the area from the west edge of Pendine to Brook in the east has been extensive and the infrastructure has not been maintained and upgrades to cope with it. This has led to issues for residents, which they wish to avoid in the future.

*Council's Initial Response*

**The site has outline planning permission with three plots under construction following Reserved Matters permission.**

**Further evidential work with the developer will be undertaken prior to the examination.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4262 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4143, along with the promotion of the client's site under representation 4142.

**4362 Persimmon Homes West Wales (Stuart Phillips) [5154] Object**

**Agent:  
WYG PLANNING & ENVIRONMENT (Louise Darch) [598]**

*Summary:*

The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny has been applied to these historic housing allocations to give confidence to the conclusions reached by the LPA that the Deposit LDP appropriately plans to provide an adequate housing supply and facilitate the delivery of the required housing numbers in Carmarthenshire. As such, the plan is unsound in its current state. Expected delivery timescale of this site in emerging LDP: 1-10 years. Reference may be made to representation 4276, along with the promotion of the client's site(s) under representations 4272 and 4275.

*Council's Initial Response*

**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**Part of the site is under construction with a full road and plot layout set out for self build development.**

**Further evidential work will be provided leading into the examination of the Plan.**

*Action*

**No change to the Plan.**



**Policy HOM2: Housing within Development Limits**

*Representation(s)*

**4460 Mr Thomas Marr [5235]**

**Object**

*Summary:*

Objection to the exclusion of a site from the development limits of Brynamman under Policy HOM2.

There are existing residential developments that fall outside of the boundary of the LDP therefore the proposed site allocation would have little visual impact on the surrounding area. The new site allocation falls within the inner boundary of the village of Brynamman. There is existing outline planning permission for development (SeC9/h1) which is set back off Mountain Road an equal distance (behind existing houses) to the proposed site allocation.

*Council's Initial Response*

**Policy HOM2 relates to proposals for housing developments on unallocated sites within the development limits of a defined settlement.**

**The objection site is separated and detached from the current built form. It's inclusion would constitute an illogical extension of the development limits.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3098 Mr T Pearce [2802]**

**Support**

**Agent: RPS Planning & Development (Emma Fortune) [681]**

*Summary:*

Full support is provided to the revision of the defined settlement limits of Pendine to include Land adjacent to Crofters Rest, Pendine and the Curtilage of Nieuport Farmhouse which are both under the sole ownership of the site promoter, Mr T. Pearce. The revision of the settlement limits to include the above additional areas of land will help to support the organic growth of Pendine as a sustainable village in a manner which is consistent with the LDP's strategic objectives, policies and provisions. The inclusion of the Land adjacent to Crofters Rest and the Curtilage of Nieuport Farmhouse includes land which is not only deliverable and available but responds to the realistic small-scale potential opportunities for growth in the village.

*Council's Initial Response*

**Support welcomed**

*Action*

**No change to the Plan**

***Representation(s)***

**3102 Mr S Cooper [4829]**

**Support**

***Summary:***

Referring to SA14 7NF, Church Road. The Development Plan appears Fundamentally Sound and I am supportive of it.

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***Council's Initial Response***

**Support welcomed**

***Action***

**No action to be taken**

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**Policy HOM3: Homes in Rural Villages**

*Representation(s)*

**3851 Welsh Government (Mr Mark Newey) [13]****Object****Summary:**

Category B - The Authority has tested 6 spatial options to identify how future growth will be distributed across the plan area. The Council's preferred option is a hybrid approach that builds on Strategic Option 4: Community Led and reflects the role and function of settlements whilst providing opportunities for growth in urban and rural areas (LDP, paragraph 8.20). Policy SP16: Sustainable Distribution, identifies 6 clusters. Within each cluster is a functionally linked area with 4 settlement tiers comprising Tier 1: Principal Centres, Tier 2: Service Centres, Tier 3: Sustainable Villages and Tier 4: Rural Villages. The Welsh Government does not object to the principal of this approach, providing that the majority of development is directed to sustainable locations in the County and the impacts on Welsh language have been fully considered (see specific comments).

b) Policy HOM3: Homes in Rural Villages (applicable to Tier 4 Settlements) - clarification and justification of approach

The Welsh Government is seeking clarification and justification for the level of growth attributed to Tier 4 settlements. The policy states that proposals for 1-4 dwellings will be permitted in these settlements and due to viability evidence this is likely to be for market housing only. The plan directs 500 dwellings to Tier 4 settlements. PPW states that only infill or minor extensions to existing settlements in the countryside may be acceptable (paragraph 3.56). The Council should explain how the scale of growth in rural villages aligns with the requirements of PPW, the role and function of those settlements which have limited services and facilities and an assessment on the opportunities for growth in this tier, having regard to the implications for the Welsh Language. The following must be addressed:

\* Appendix 1 of the 'Housing Supply' Topic Paper lists the Tier 4 settlements with 'appropriate numbers within the settlements' and a 'cap on new proposed dwellings within the settlement'. In addition, Appendix 2 states that many of the Tier 4 villages already have extant planning permission / existing LDP allocations, way in excess of the proposed caps? It is unclear what the total housing proposed in Tier 4 villages is, i.e. what is currently extant and how this relates to the 20% uplift in each settlement. Is the 20% in addition to sites with planning permission? Are current LDP allocations being 'rolled over' and included in capacity at these settlements?

\* There is no justification for a blanket 20% numerical uplift to the number of existing homes in each rural village, totalling 505 units (subject to clarification) on small sites (1-4 units) with no settlement boundaries. The rationale for this blanket approach has not been evidenced and it is unclear why the uplift has been applied equally to all villages when the 'Role and Function' Topic Paper identifies some villages as more sustainable than others. The reasoned justification to the policy suggests the 20% cap could be exceeded even further to deliver affordable homes? It is questionable how this approach would be implemented in practice. Thresholds/ caps have not worked well in other parts of Wales.

\* The Council's 'Rural Needs Study' 2019 states that in rural settlements, there is a predominant need for smaller affordable homes. While commuted sums may be achievable in some cases, it is likely that the majority of housing delivered in these settlements will be for market housing. In addition, the study also highlights that half of the properties sold in these areas are likely to be for people outside the County Borough. The policy appears at odds with the evidence base. It is unclear how this approach aligns with findings in the SA/SEA, which identifies that growth and inward migration has the potential to dilute the Welsh language, which would be frustrated by the development of market housing in rural villages.

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### *Council's Initial Response*

The respondent notes the level of evidence available in support of the sustainable distribution of housing growth. However, the council recognises that further information will be required in order to ensure that some of the matters raised are sufficiently clear. Further background evidence will be provided leading into examination.

Reference should be made to the Council's Focused Change which amends the policy in terms of the cap on the number of new houses which will be permitted in each settlement.

#### **Welsh Language response**

In regards the concerns raised on the Welsh language, it should be noted that the Role and Function Topic Paper (January 2020) can be updated ahead of the submission of the Plan for Examination. Further evidence will be produced ahead of the submission of the Plan for Examination. This includes building upon the Welsh Language Impact Assessment (WLIA - December 2019), undertaking further analysis work in terms of population and household projections/ migration data.

With regards the implications for the Welsh Language the WLIA has assessed the impact of the Deposit LDP's spatial strategy upon the Welsh language concluding in section 2.5 that it is likely to have a minor positive impact upon the Welsh language compared to the current "business as usual" LDP. Evidence collected to date on the relationship between new housing and the Welsh language do not provide definitive answers; an analysis of housing completions and the difference in Welsh speakers between 2001 and 2011 shows no relationship (other than a very weak negative correlation between the two datasets) between the level of new housing and changes in the Welsh language. Other evidence collected in respect of the occupancy of new homes indicates that a significant proportion of new developments are occupied by existing Welsh speaking households moving from the existing stock.

As explained in the Deposit LDP's evidence base, the relationship between development and the Welsh language is a difficult one to understand fully. The Council has undertaken research and has responded according to the findings of that research. Whilst there is often a presumption that a higher level of development can negatively impact upon the Welsh language, there appears to be no evidence to indicate that this has been the case in Carmarthenshire. As explained in the LDP's Topic Paper on the Welsh Language (August 2019), there are a number of factors, other than development, which can impact upon the Welsh language, and whilst these largely fall beyond the remit of the LDP, it is acknowledged by the Council that these could play a contributory, if not fundamental, role.

The Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) makes these comments in respect of Spatial Option 3 - Dispersal which sought to distribute housing, employment and other forms of development on a broad basis between settlements within the County, both urban and rural. This Option would see a higher proportion of the County's growth being directed to rural areas than is being proposed through the Preferred Strategy for the Deposit LDP. These comments relate to a strategy which would have seen a much higher proportion of growth directed to smaller settlements than that facilitated by Policy HOM3.

### *Action*

**No change to the Plan**

**Representation(s)**

**3327 Mr Owen Williams [3158]**

**Object**

**Summary:**

In summary, I believe that this passage of the LDP concerning infilling in rural villages does not meet the first test of soundness, as it is evident that the policy is not in line with other local authority policies concerning the amount of infilling that is allowed to take place. It suggests that proper research has not been undertaken into national standards and best practice and uses figures that are unjustified and unsupported by any evidence. For these reasons I propose that the maximum infilling allowable should be 2 dwellings - in line with other policies across Wales.

**Council's Initial Response**

**Disagree. The scale of settlements set out within Tier 4 vary considerable within the County. Policy HOM3 recognises the potential for new development, and seeks to limit the number of new housing within settlements by adopting a cap on the number of dwellings which can be delivered during the plan period. This is considered necessary so that smaller settlements within the county would only favour small scale development, whilst other larger settlements within Tier 4 may be able to provide developments of up to 4 dwellings, albeit up to the cap set out within the evidence base.**

**The policy also provides guidance on acceptable plots which would support the development of cohesive and sustainable communities.**

**Action**

**No change to the Plan.**

*Representation(s)*

**4081 Mr Owen Williams [3158]**

**Object**

*Summary:*

Objects to policy HOM3 in that this is incompatible with neighbouring authority plans and inconsistent with policies on infill more generally for rural areas. Infilling can be used to justify all manner of inappropriate developments if given too wider latitude of operation.

It is important for Carmarthenshire County Council to demonstrate a similar consistency with what is clearly a national trend towards small and more easily managed infilling within rural settlements. As no justification for the 4-dwelling upper limit has been shown, the Deposit Plan should be modified reflect the emerging standard of no more than 2 dwellings for an infill site, especially in rural areas. This would ensure more sustainable growth that would be much more likely to keep pace with infrastructural developments and to ensure that the overall environmental, landscape, and character impacts upon rural areas are minimised to acceptable levels.

*Council's Initial Response*

**Disagree. The scale of settlements set out within Tier 4 vary considerable within the County. Policy HOM3 recognises the potential for new development and seeks to limit the number of new housing within settlements by adopting a cap on the number of dwellings which can be delivered during the plan period. This is considered necessary so that smaller settlements within the county would only favour small scale development, whilst other larger settlements within Tier 4 may be able to provide developments of up to 4 dwellings, albeit up to the cap set out within the evidence base.**

**The policy also provides guidance on acceptable plots which would support the development of cohesive and sustainable communities.**

*Action*

**No change to the Plan.**



**Representation(s)**

**3832 Mr & Mrs Jones [5073] Support**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

**Summary:**

Fully support the provision of Policy HOM3 and the designation of Whitemill as a Rural Village capable of accommodating further open marking housing development following the adoption of the Carmarthenshire Local Development Plan.

**4092 Mr & Mrs Henry [3677] Support**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

**Summary:**

Support for Policy HOM3, in relation to the settlement of Felindre.

The inclusion of Felindre as Rural Village of Cluster 5 is both welcomed and supported.

Felindre is located at a sustainable location with good access to a nearby larger settlement that contains a wide range of local services and community facilities. Access to this settlement is possible by non-motorised means and the village is also positioned on a regular bus service route, giving it good access to further settlements of the County and their associated facilities and services. Its sustainable location therefore merits its designation as a Rural Village to enable it to facilitate further housing development to serve the immediate rural community.

**4110 Mr Trevor Davies and Sons [5145] Support**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

**Summary:**

The inclusion of Llansadwrn as Rural Village of Cluster 5 (under Policy HOM3) is both welcomed and supported.

In order to sustain and preserve a community's level of sustainability, it is vital that provision for new housing is made available for all its members, irrespective of their social or economic backgrounds. This then ensures a positive balance within such communities that will secure their sustainability for the future. It is considered that Policy HOM3 now ensures that local planning policy in Carmarthenshire goes some way to assist in securing this objective.

**3892 Mrs E Goodwin-Jones [5083] Support**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

**Summary:**

On behalf of our Client, we fully support the provision of Policy HOM3 and the designation of Felingwm Isaf as a Rural Village capable of accommodating further open marking housing development following the adoption of the Carmarthenshire Local Development Plan.

Felingwm Isaf is located at a sustainable location with good access to nearby larger settlements that contain a wide range of local services and community facilities. It is also positioned on a public highway that is served by a regular service, giving it good access to further settlements of the County and their associated facilities and services.

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**3666 Mr & Mrs Hughes [5033] Support**

***Agent: Evans Banks Planning Limited (Richard Banks) [4967]***

***Summary:***

Support of policy HOM3 specifically in relation to Manordeilo being classified as a Rural Village

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**3747 Mr M Thomas [3749] Support**

***Agent: Evans Banks Planning Limited (Richard Banks) [4967]***

***Summary:***

Our clients have given careful consideration to the categorisation of Cross Inn as a "Rural Village", and accordingly wholeheartedly welcome and support the decision of the Authority to include the village in those settlements listed under Tier 4 within Cluster 6 of the Carmarthenshire Local Development Plan.

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**4115 Mr Martin Ingram [3506] Support**

***Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]***

***Summary:***

Support the provision of HOM3 and identify that their clients land represents one such opportunity for new housing development and being well related to the existing form of the village.

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**3769 Mr and Mrs Rees [5051] Support**

***Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]***

***Summary:***

Support for Policy HOM3.

We fully support the provision of Policy HOM3 and the designation of Pontantwn as a Rural Village capable of accommodating further open market housing development following the adoption of the Carmarthenshire Local Development Plan.

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***Council's Initial Response***

**Support Welcomed.**

**Further background evidential work will be undertaken on Policy HOM3 in relation to its relationship to other growth policies in the plan leading into the examination.**

***Action***

**No change to the Plan**

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*Representation(s)*

**4462 Mr & Mrs B E & D R Harries [380]**

**Support**

*Summary:*

Support the written statement and in particular, the removal of boundary limits in some areas. The settlements identified as rural villages, such as Broadway, near Laugharne, are constrained by the current LDP.

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*Council's Initial Response*

**Support Welcomed.**

*Action*

**No change to the Plan.**

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## Policy HOM4 - Homes in Non-Defined Rural Settlements

### *Representation(s)*

**3852 Welsh Government (Mr Mark Newey) [13]**

**Object**

#### *Summary:*

Category B - The Authority has tested 6 spatial options to identify how future growth will be distributed across the plan area. The Council's preferred option is a hybrid approach that builds on Strategic Option 4: Community Led and reflects the role and function of settlements whilst providing opportunities for growth in urban and rural areas (LDP, paragraph 8.20). Policy SP16: Sustainable Distribution, identifies 6 clusters. Within each cluster is a functionally linked area with 4 settlement tiers comprising Tier 1: Principal Centres, Tier 2: Service Centres, Tier 3: Sustainable Villages and Tier 4: Rural Villages. The Welsh Government does not object to the principal of this approach, providing that the majority of development is directed to sustainable locations in the County and the impacts on Welsh language have been fully considered (see specific comments).

c) Policy HOM4: Homes in Non-Defined Rural Settlements (Tier 5)

The policy currently permits up to 2 local needs affordable housing in unidentified hamlets or groups of dwellings. This approach is contrary to PPW, which clearly states that "new buildings in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled" (paragraph 3.56). The policy does not identify hamlets or groups of dwellings. Policy HOM4 should be deleted accordingly. The Welsh Government considers it would be appropriate to deliver local needs/affordable housing in identified Tier 4 Rural Villages. This would align with the Council's own evidence base and SA conclusions in respect of the Welsh Language. (See specific comments on Welsh Language).

*Council's Initial Response*

**Disagree.** The policy seeks to provide for flexibility within the rural context and the nature of rural communities within Carmarthenshire.

In regards the concerns raised on the Welsh language, it should be noted that the Role and Function Topic Paper (January 2020) can be updated ahead of the submission of the Plan for Examination. Further evidence will be produced ahead of the submission of the Plan for Examination. This includes building upon the Welsh Language Impact Assessment (WLIA - December 2019), undertaking further analysis work in terms of population and household projections/ migration data.

With regards the implications for the Welsh Language, the WLIA has assessed the impact of the Deposit LDP's spatial strategy upon the Welsh language concluding in section 2.5 that it is likely to have a minor positive impact upon the Welsh language compared to the current "business as usual" LDP. Evidence collected to date on the relationship between new housing and the Welsh language do not provide definitive answers; an analysis of housing completions and the difference in Welsh speakers between 2001 and 2011 shows no relationship (other than a very weak negative correlation between the two datasets) between the level of new housing and changes in the Welsh language. Other evidence collected in respect of the occupancy of new homes indicates that a significant proportion of new developments are occupied by existing Welsh speaking households moving from the existing stock.

As explained in the Deposit LDP's evidence base, the relationship between development and the Welsh language is a difficult one to understand fully. The Council has undertaken research and have responded according to the findings of that research. Whilst there is often a presumption that a higher level of development can negatively impact upon the Welsh language, there appears to be no evidence to indicate that this has been the case in Carmarthenshire. As explained in the LDP's Topic Paper on the Welsh Language (August 2019), there are a number of factors, other than development, which can impact upon the Welsh language, and whilst these largely fall beyond the remit of the LDP, it is acknowledged by the Council that these could play a contributory, if not fundamental, role.

The Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) makes these comments in respect of Spatial Option 3 - Dispersal which sought to distribute housing, employment and other forms of development on a broad basis between settlements within the County, both urban and rural. This Option would see a higher proportion of the County's growth being directed to rural areas than is being proposed through the Preferred Strategy for the Deposit LDP. These comments relate to a strategy which would have seen a much higher proportion of growth directed to smaller settlements than that facilitated by Policy HOM4.

*Action*

**No change to the Plan.**



*Representation(s)*

**3672 JEM & EJ Hughes [5038]**

**Object**

**Agent: Aled Thomas Planning Design Ltd (Mr Aled Thomas) [3225]**

*Summary:*

Objection to policy HOM4, stating that further information is required regarding policy HOM4 regarding what happens when the properties cannot be let or sold as an affordable property.

*Council's Initial Response*

**The approach as set out within policy SP16 Strategic Policy - SP16: Sustainable Distribution - Settlement Framework is considered sound. The diversity of the County is recognised with regard given to housing in rural areas, and the value such areas play within the County. Within rural villages (Tier 4) and non-defined settlements, new housing development will be limited to small scale opportunities. Reference is made to Policy HOM3 of this Plan where opportunities may exist for proponents of appropriate residential proposals in such areas.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3977 Harold Metcalfe Partnership (Mr D A Jones) [706]**

**Support**

*Summary:*

Support for Policy HOM4, particularly in relation to candidate site SR/165/110.

In our original submission we encouraged the LPA to support moderate housing development within our small communities. Policy HOM4 demonstrates that the LPA is in support of that Policy.

In regard to site SR/165/110, the site could accommodate 3 housing plots and complies with Policy HOM4 in all ways.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



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## Paragraph Para 11.103

### *Representation(s)*

**4471 Calon Cymru Network CIC (Dr Pat Racher) [5222]**

**Object**

#### *Summary:*

In relation to rural affordable housing, Calon Cymru agrees with 11.103 for occupancy controls to be imposed to ensure that homes remain affordable. In our view, community land trusts are an ideal legal form for maintaining affordability. Consideration should also be given to facilitating self-build on approved and serviced sites, where construction can be paced to suit evolving household needs and budgets.

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### *Council's Initial Response*

**Noted. The revised LDP allows the opportunity for the provision of affordable housing through various mechanism provided it accords with the policies set out within the Plan.**

### *Action*

**No change to the Plan**

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## Policy HOM5: Conversion or Subdivision of Existing Dwellings

### *Representation(s)*

**3680 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

#### *Summary:*

We note the purpose of this policy but would advise against any proposal in a flood risk area if it involved new residential units situated wholly on the ground floor. We acknowledge that these dwellings are classed as having highly vulnerable use as defined in Technical Advice Note (TAN) 15: Development and Flood Risk. However, such conversions could but all parts of what would be a new residential unit, at risk of flooding. Such applications would require a Flood Consequences Assessment (FCA) to demonstrate that TAN 15's A1.14 criteria can be met, or an amended layout with no new self-contained residential units situated on the ground floor.

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### *Council's Initial Response*

**Comments Noted**

### *Action*

**No change to the Plan**

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**Policy HOM6: Specialist Housing**

*Representation(s)*

**3090 Mr Ian Morgan [4818] Object**

*Summary:*

Suggest a new policy to the revised LDP relating to the establishment of private sector children's homes, including the potential wording for such a policy

**3087 Mr Ian Morgan [4818] Object**

*Summary:*

Suggest a new policy to the revised LDP relating to the establishment of private sector children's homes, including the potential wording for such a policy

*Council's Initial Response*

**Disagree. Paragraph 11.107 defines Specialist Housing, of which extra or close care housing falls within its definition. Additionally the HOM6 policy refers to a set of criteria which, along with other policies within the plan would be able to deal with such an application and adequately address the concerns of the respondent.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3660 Mr N Bundock [5027] Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Consider that the draft settlement limits for Glanamman / Garnant, as defined under Policy SD1 "Settlement Limits", should be amended to include the land within this representation.

The land should be appropriately allocated for Specialist Housing under Policy HOM6. There are no available allocated sites within Glanamman / Garnant in which a Care Village could be adequately sited, both in terms of land availability, and ease of access onto the local highway network,

*Council's Initial Response*

**Diasgree. The Plan does not allocate sites under a C2 use class, and therefore the development limits will not be amended. Any potential new proposal will be considered against the policies set out within the revised LDP, most notably policy HOM6 which deals with new proposals directly related to the development limits of defined settlements.**

*Action*

**No change to the Plan.**

**Policy Strategic Policy - SP 4: Affordable Homes Strategy**

*Representation(s)*

**3157 Professor John Finney [4854]**

**Object**

*Summary:*

The affordable/market split proposed is 1600/8560, or 16%/84%. This is significantly lower than the the 2019 LHMA ration of 24%/76%. Noting the importance of good quality housing for meeting the health and wellbeing aim, the proposed level of affordable housing seems totally inadequate. Elsewhere it is stated that1 in 3 households are classed as in poverty. A greater fraction of affordable housing is surely needed to help achieve the health and wellbeing aims as well as reduce poverty.

*Council's Initial Response*

**Disagree. SP4 sets out the minimum provision of affordable housing during the plan period, which is delivered through various housing components of supply i.e. from allocations, small sites or large windfall sites).**

**In terms of the affordable housing targets set out in AHOM1, the revised LDP has been subject to detailed evidence gathering and its requirements reflect the findings of the LDP's viability study. In addition it should be noted that the LDP and planning system are only one of few mechanisms used to meet this affordable housing need identified within the LHMA.**

*Action*

**No change to the Plan.**



**Representation(s)****3865 Welsh Government (Mr Mark Newey) [13]****Object****Summary:**

Category B - Affordable Housing

Local Housing Market Assessment - PPW identifies the LHMA as a core piece of evidence setting out the level and type of housing need in an area. Only a draft LHMA Area Summary has been submitted as part of the evidence base and whilst this Summary (December 2019) identifies a need for 2,304 affordable homes (154 units per annum) over the plan period, it does not set out the tenure split. Without knowing the tenure mix for social rent and intermediate housing, it is unclear if the 50% social rent and 50% intermediate housing tested in the viability assessment is appropriate, especially as the level of intermediate housing seems high. This will impact on the viability assessment, both plan-wide and site specific targets and thresholds in Policy AHOM1.

**Council's Initial Response****Comments noted.**

**The Local Housing Market Assessment (LHMA) has been prepared as part of a regional collaboration with the publication of the area summary reflective of the version available for publication at the time of the Deposit. The full LHMA and the finalised area summary will be published in due course and will be available as part of the Plan's evidence base.**

**In relation to the respondent's query on the tenure mix for social rent and intermediate housing the transfer values applied to affordable homes are the same for social rented and intermediate tenures. Reference should be had to paragraphs 4.6 - 4.8 of the Report of Financial Viability as contained within the Revised LDP's evidence base. The balance between those two tenures is not considered relevant to viability, and would be determined by need in a particular Affordable Housing Action Area.**

**Action****No change to the Plan.****Representation(s)****3374 Casey Edwards [4773]****Support****Summary:**

Our representation on the deposit plan highlights the potential role of community-led housing schemes in helping to provide more quality, affordable housing in Carmarthenshire, which meets the needs of the community. Whilst we recognise that community-led housing will only play a small part in meeting affordable housing targets and will never replace traditional house building, it can help authorities in bringing forward new market and affordable schemes to address local needs, a key target of the deposit plan.

**Council's Initial Response**

**Noted. The revised LDP sets a policy framework to allow the potential for various forms of affordable housing to be provided within Carmarthenshire.**

**Action****No change to the Plan**

**Policy AHOM1: Provision of Affordable Homes**

*Representation(s)*

**3235 Mr D Chapman [5063] Object**

***Agent: RPS Planning & Development (Mrs Kate Gapper) [797]***

***Summary:***

Support the AH provisions as set out in Policy AHOM1. However to ensure that the provisions of this policy do not contradict with Policy HOM1, the policy should be worded to reflect the fact that the housing allocation at West Carmarthen (Site Ref: PrC1/MU1) for the development of 700 new homes makes provision for an affordable housing contribution of 12% in recognition of the costs associated with the Carmarthen West Link Road on the financial viability of the site.

**Proposed Change to Deposit Revised LDP**

It is suggested that the third paragraph on page 112 of the Deposit Revised LDP be amended to read as follows:

Only in exceptional circumstances on sites such as the West Carmarthen mixed use allocation site (Ref: PrC1/MU1) where the above requirements cannot be achieved due to their impacts upon a proposal's financial viability, a variation may be agreed on a case-by-case basis.

**3239 E & O & E Jones & Elias [5052] Object**

***Agent: RPS Planning & Development (Mrs Kate Gapper) [797]***

***Summary:***

Support the AH provisions as set out in Policy AHOM1. However to ensure that the provisions of this policy do not contradict with Policy HOM1, the policy should be worded to reflect the fact that the housing allocation at West Carmarthen (Site Ref: PrC1/MU1) for the development of 700 new homes makes provision for an affordable housing contribution of 12% in recognition of the costs associated with the Carmarthen West Link Road on the financial viability of the site.

**Proposed Change to Deposit Revised LDP**

It is suggested that the third paragraph on page 112 of the Deposit Revised LDP be amended to read as follows:

Only in exceptional circumstances on sites such as the West Carmarthen mixed use allocation site (Ref: PrC1/MU1) where the above requirements cannot be achieved due to their impacts upon a proposal's financial viability, a variation may be agreed on a case-by-case basis.

***Council's Initial Response***

**Agreed in part.**

**The West Carmarthen site identified in the HOM1 housing allocation list recognises that the affordable housing figure is set at a 12% target.**

**In light of the above the council recognises the need for clarity in relation to the percentage target for west Carmarthen. A new sentence will be inserted to paragraph 11.124 and the plan to be amended accordingly.**

***Action***

**Change to the Plan.**



*Representation(s)*

**3359 Barratt David Wilson Homes (Mrs Francesca Evans) [4879]**

**Object**

*Summary:*

In summary, BDW objects to this policy. Further justification and explanation is sought on the rationale behind applying varying affordable housing percentages according to the scale of development as opposed to a range of affordable housing percentages across different market areas. It is not considered that this policy is based on robust viability information. BDW is concerned that this policy has the potential to have a detrimental impact on development viability and hence the delivery of affordable housing and housing in general in Carmarthenshire. As such, BDW do not consider this policy should be adopted in its current form.

*Council's Initial Response*

**Disagree. The Council has undertaken robust viability evidence to establish affordable housing targets set out within the Plan.**

*Action*

**No change to the Plan**

*Representation(s)*

**4592 Ceredigion County Council (Anjuli Davies) [5303]**

**Object**

*Summary:*

The level of affordable housing sought ranges from a commuted sum contribution to in the region of 10-20% affordable housing provision on-site. Ceredigion County Council has yet to undertake a Strategic Viability Assessment, however, once it has done, the results should be compared to ensure that a consistent level of provision is sought on either side of the river Teifi so as not to advantage or disadvantage the profitability or deliverability of particular sites in Carmarthenshire over those in Ceredigion.

*Council's Initial Response*

**Noted. The revised LDP has been subject to detailed evidence gathering and its requirements reflect the findings of the LDP's viability study and takes into consideration other factor such as the LHMA, past delivery rates and the need for flexibility to allow for variances between sites**

*Action*

**No change to the Plan**

**Representation(s)****3866 Welsh Government (Mr Mark Newey) [13]****Object****Summary:**

Category B - Affordable Housing

Affordable Housing Targets and Thresholds - The affordable housing checklist in the DPM sets out the information that all LDPs should contain to support the delivery of affordable housing. Taking on board our previous comments on the tenure split, the Council will need to consider how findings in the viability assessment have informed Policy AHOM1 in the plan. The Welsh Government has no concerns on the model used in the high level study, nor the cost inputs, this will be for the industry to comment on. However, the Welsh Government has concerns on the policy approach regarding the use of action areas (6 or 4?), median income and site size, implemented through the target ranges in AHOM1. The approach is unclear and confusing and it is not possible to ascertain if the targets are appropriate, viable or maximise affordable housing in the Country. The following needs to be addressed:

- a. It is unclear why the Council has moved from a market area viability approach in the adopted LDP to an approach based on site size. Does a site of 19 homes have the same viability/costs across the entire County Borough? The current adopted plan approach of market areas suggests this may not be the case?
  - b. The policy is also linked to a median household income approach across 4 (or 6?) Affordable Housing Action Areas (AHAA). The approach is confusing, and it is unclear how this would be implemented in practice. It is also unclear how it relates to areas of viability and why it is appropriate to replace the Welsh Government's Acceptable Cost Guidance (ACG) in favour of this approach? How does household earnings impact on site viability, particularly as earnings will vary year on year? The Council needs to explain this approach and why it is different to residual values determined across sub-market areas in the adopted plan.
  - c. It is unclear how the policy ranges relate to the viability assessment, especially as the assessment does not appraise sites by range or identify the AHAAs? For example, the final appraisal in Appendix E of the viability assessment identifies that 26% affordable housing is viable on a 72 unit site. How does this align with Policy AHOM1 and a target of 20-25% on sites of 50+ units? How does an approach of ranges/site size maximise affordable housing?
  - d. It is also unclear why affordable housing on allocated sites and large windfalls has been calculated using the lowest percentage target?
  - e. There is no policy for affordable housing led sites (50%) affordable housing on public land.
- <https://gov.wales/increasing-supply-affordable-homes-through-planning-july-2019>

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**Council's Initial Response**

**Comments noted.**

In relation to the respondents concerns on how findings in the viability assessment have informed Policy AHOM1 in the plan specific reference is made to The Financial Viability Report notably page 10, and particularly para. 3.15. This explains how the Affordable Housing percentages in Policy AHOM1 were informed by the high-level viability testing/study.

The following details the response in relation to the respondents points to be addressed:

a. Viability was tested not only by site size (using the typologies identified in Appendix B of the Report on Financial Viability as set out within the evidence base for the Revised LDP, but also across the range of Community Network/ Affordable Housing Action Areas (AHAA's). Whilst costs on the whole are reasonably constant across the County, they do vary according to site size. Appendix B shows how different levels of cost (as well as fees and profit margins) were assumed for different sizes of site. Values, on the other hand, do vary across the County, and in different AHAA's. This is partly because of differing levels of value ascribed to affordable homes (AH) in each AHAA; but also, because open market values vary across the County. The high-level testing thus produced a range of AH percentages that it should be viable for the open market housing to support, the lower percentages being found in the lowest value AHAA, and the higher percentages in the highest value AHAA. Burrows-Hutchinson Ltd (BHL) therefore recommended that the Council redefine their existing policy so as to specify a range of AH percentages that it should be viable for sites to provide, depending first on their size, but also on their location within the County.

Bearing in mind the varied nature of development opportunities, and the number of variables in Viability generally, it was also felt that specifying a range of AH percentages in policy AHOM1 would provide an ability to take a flexible approach towards site proposals, and in the determination of planning applications.

The policy expects sites in higher value areas to deliver AH percentages at the upper end of the range stated; but recognises that a single percentage may/will not be appropriate for all sites, and may also be subject to a degree of change over time, it offers a suitable degree of flexibility as well. The Council can push for the higher percentages where it considers this appropriate; while the alternative approach of setting the percentage at the lowest common denominator, to ensure that all sites would be viable, does not afford the same opportunity to maximise AH delivery.

b. The Council's approach to affordability is based on TAN 2 with affordability dependent on (1) price of housing, either for rent or for sale and (2) the income of the household that is looking for somewhere to live.

Household incomes vary considerably in different parts of the County. It is not considered reasonable to base affordability figures on a County average, as this will not be meaningful to a family in in different parts of the County. The Council recognises that household income figures vary every year as do market prices for homes for rent and for sale.

Acceptable Cost Guidance (ACG) is not related to affordability rather it relates to the cost of construction by registered social landlords. ACG has little relationship to local

construction costs, as it is based on a very partial dataset, such as past construction costs by Welsh housing associations. In areas where housing associations haven't built anything for years, there is limited data. These tend to be rural areas, which as a consequence get put into band 1 (the lowest). This in turn makes housing association development in many rural areas not financially viable, so consequently, there lesser opportunity for development.

c. The five assessments in Appendix E to the Report on Financial Viability were included merely as a examples of the high-level testing. It was considered that including all the results would overburden the report unnecessarily. A more comprehensive table of results could be added to the Report on Financial Viability if this would assist in providing additional clarity. The top figure (26.4%) and some others were deliberately "rounded" to reflect the degree of accuracy that can be evidenced from high-level studies of this kind.

d. This allows the Council to set a minimum level in relation to a identified target. Whilst this does not in itself show a maximum level it does not preclude achieving AH based on the higher percentages.

e. The Council notes the content of the Chief Planning Officers letter and will consider the content accordingly as part of the Focused Changes to the Plan. The Council notes however that the viability of such public owned sites will depend to a very large extent on the level of SHG that they receive or qualify for. The Council is however, committed to delivering an ambitious level of affordable housing. In this respect reference is made to the Council's Affordable Housing Delivery Plan.

*Action*

No change to the Plan. Note a change may emerge in relation to the response to point e.



*Representation(s)*

**3840 Mr James Bromhead [5053]**

**Support**

**Agent: RPS Planning & Development (Mrs Kate Gapper) [797]**

*Summary:*

Our client supports the Affordable Housing provisions as set out in Policy AHOM1. However to ensure that the provisions of this policy do not contradict with Policy HOM1, the policy should be worded to reflect the fact that the housing allocation at West Carmarthen (Site Ref: PrC1/MU1) for the development of 700 new homes makes provision for an affordable housing contribution of 12% in recognition of the costs associated with the Carmarthen West Link Road on the financial viability of the site.

Proposed Change to Deposit Revised LDP

It is suggested that the third paragraph on page 112 of the Deposit Revised LDP be amended to read as follows:

Only in exceptional circumstances on sites such as the West Carmarthen mixed use allocation site (Ref: PrC1/MU1) where the above requirements cannot be achieved due to their impacts upon a proposal's financial viability, a variation may be agreed on a case-by-case basis.

*Council's Initial Response*

**Agreed in part.**

**The West Carmarthen site identified in the HOM1 housing allocation list recognises that the affordable housing figure is set at a 12% target.**

**In light of the above the council recognises the need for clarity in relation to the percentage target for west Carmarthen. A new sentence will be inserted to paragraph 11.124 and the plan to be amended accordingly.**

*Action*

**Change to the Plan.**



*Representation(s)*

**3192 RPS Planning & Development (Mrs Kate Gapper) [797] Support**

*Summary:*

Firstly, it should be noted that our client supports the Affordable Housing provisions as set out in Policy AHOM1. However to ensure that the provisions of this policy do not contradict with Policy HOM1, the policy should be worded to reflect the fact that the housing allocation at West Carmarthen (Site Ref: PrC1/MU1) for the development of 700 new homes makes provision for an affordable housing contribution of 12% in recognition of the costs associated with the Carmarthen West Link Road on the financial viability of the site.

*Council's Initial Response*

**Agreed in part.**

**The West Carmarthen site identified in the HOM1 housing allocation list recognises that the affordable housing figure is set at a 12% target.**

**In light of the above the council recognises the need for clarity in relation to the percentage target for west Carmarthen. A new sentence will be inserted to paragraph 11.124 and the plan to be amended accordingly.**

*Action*

**Change to the Plan.**

**Policy Strategic Policy - SP 5: Strategic Sites**

*Representation(s)*

**3870 Welsh Government (Mr Mark Newey) [13] Object**

*Summary:*

Category B - There is a focus in the plan through Policies SG1 and SP5 on developing strategic and large scale regeneration and mixed-use sites. Sites of over 100 units in Appendix 1 of the Infrastructure Plan are supported by information on phasing, infrastructure requirements and planning obligations but there is no evidence on master planning, viability, detailed costs or commitment from developers through Statements of Common Ground (SoCG).

*Council's Initial Response*

**Noted. The respondent's recognition of the information contained within the Infrastructure Plan is welcomed, this will however be supplemented as appropriate. Further evidence on residential sites of over 100 units as cited by the respondent, including matters relation viability and deliverability as well as Statements of Common Ground, will form part of the LDP documents and evidence base, as well as further informing the infrastructure plan as the Plan progresses towards submission.**

*Action*

**No change to the Plan**

**Representation(s)**

**3681 Natural Resources Wales (Miss Sharon Luke) [3253] Support**

**Summary:**

We acknowledge the two strategic sites identified as key components of the Swansea Bay City Deal:

- \* The Life Science and Well-being Village, Llanelli.
- \* Yr Egin - Creative Digital Cluster, Carmarthen.

We have no comment to make on Policy SP5 as we are involved with both sites through the planning process. We will continue to work with your Authority in progressing the development of these sites.

**4047 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830] Support**

**Summary:**

Given that each of these sites has extant planning consent, there is nothing specific for us to advise.

**Council's Initial Response**

**Comments noted.**

**Action**

**No change to the Plan.**



**Paragraph Strategic Policy - SP 5: Strategic Sites, PrC2/SS1***Representation(s)***4269 - RSAI - [4993]****Object*****Agent: Lichfields (Mr Arwel Evans) [3166]******Summary:***

In addition to the points that we have raised about the strategy and spatial distribution of development we also wish to make comments about suitability, viability and deliverability of allocations. Not delivering enough housing will have huge consequential impacts on the Council's ability to attract new jobs to the area as the LDP aspires to do. Upon clarifying this matter with the agent, it was confirmed that they wish to attribute the reference to this strategic policy in their representation form against prc2/ss1 due to the fact that it has a housing component of 240 units. Reference is also made to rep 4243 where the client's site is promoted.

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**Council's Initial Response**

**Comments noted.**

The allocation of the site within the LDP has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

The Council is confident in the delivery of this site. Feedback attained from the landowner/developer (November 2020) confirms intent to deliver in accordance with the Plan period.

This feedback states the following:

The allowance of 240 c3 use class units within the overall allocation is appropriate and in keeping with the aspirations for the site.

The planning position on the site is set out (outline planning permission - S/36948).

The scheme is being developed in accordance with the phasing plan as approved within planning.

The scheme has been approved by Carmarthenshire County Council and Swansea Bay City Deal's Joint Committee.

A scheme for betterment on the site has been identified and agreed at planning stage (note the landowner/developer confirms the provisions of policy INF4 are known and will be adhered to by the scheme).

The project timescales are aligned with the dates set out in the Site Trajectory Schedule (Housing Trajectory of the Plan).

Also it is noted that the site is named Pentre Awel.

It should be noted that the landowner/developer has also agreed to complete a Statement of Common Ground (SCOG) detailing timescales, funding, marketing, delivery and viability in regards this site ahead of the LDP Examination.

Sufficient evidence has been provided by the landowner/developer to prove the site is able to be delivered within the Plan period.

Where appropriate, further evidential work can be undertaken prior to the examination into the revised LDP.

It is considered that the residential component of the overall strategic site scheme is integral to the delivery and wider offer. In residential terms, it will facilitate the delivery of a range and choice of homes across the area that will meet the challenges faced in terms of an increasing diverse requirement in terms of housing need.

This is a notable site for the settlement in terms of the number of residential units. It should be noted however that there are a number of housing developments already under construction and / or completed within the settlement to date within the Plan period. Notable of which are PrC2/h3 (94 units), PrC2/h13 (29 units), PrC2/h18 (32 units), prc2/h19 (240 units initially) and prc2/h21 (34 units). To this end, the supply of housing across the plan period within the settlement is appropriate within the early years of the trajectory, and this site will make a contribution in due course. This also leads to a natural phasing of development across the Plan period

**As a cross reference note - the respondent's site is promoted under representation reference number 4243. The Council's response to this can be viewed under the Council's HOM1 policy responses.**

*Action*

**No change to the Plan as a result of this representation / objection.**

**(However it should be noted that following the feedback received from the landowner/developer (as discussed in Council's response above) an amendment will be made to the Plan by way of focused change in respect of the site name to read : Pentre Awel).**



**Policy Strategic Policy - SP 6: Employment and the Economy**

*Representation(s)*

**3879 Welsh Government (Mr Mark Newey) [13] Object**

*Summary:*

Category B - Employment Provision and Jobs

Growth forecasts over the plan period evidence employment growth of 5,310 new jobs (354 a year). There appears to have been no assessment on the number of jobs in the Class B sector or how this aligns to the scale of employment allocations in the plan, totalling 77.93ha in Policy SP6. The evidence should be clear on the scale of B-Class jobs and how this has informed the level of employment provision in the plan by sector.

*Council's Initial Response*

**Noted.**

**The Plan seeks to place regeneration and economic growth as an integral part of its strategic ambitions. This is particularly pertinent as the County charts its recovery from the impacts of Covid-19 and the lockdown. In addition, the Plan seeks to ensure Carmarthenshire is well placed, and able to deliver on the ambitions through the Swansea Bay City Deal and deliver economic prosperity for its communities.**

**The Deposit Revised Plan has been informed by evidence in the form of the annual Employment Land Reviews, the Employment Sectoral Study (2017), and the Two County Economic Study for Carmarthenshire and Pembrokeshire. Further evidence has been commissioned which will specifically consider the welsh Government's representations.**

**The current work being carried out, together with the latest employment land review for 2020, as well as data, information and anecdotal evidence provided by our Economic Development Division, will all form part of the evidence base that will be submitted to the Welsh Government with the Plan in 2021.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3461 Mr D Richards [4988]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Seeking the inclusion of a new employment site.

The designation of this area of land as an employment site will provide considerable economic development at this important strategic gateway site into Llanelli.

Its designation would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for wider economic activity. Its development would be in keeping and in character with the local area and will ensure a deliverable source of future economic growth.

*Council's Initial Response*

**There is sufficient land available within Llanelli to meet its employment need. Potential future proposals on this site will be dealt with under policy.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4474 welsh government (Mr Paul Evans) [5241]**

**Object**

*Summary:*

This site represents a suitable and sustainable location for development. Development on this site will strive to meet the goals of the WBFGA. The site is also considered to align with key objectives of WG's Property Development Plan and therefore will meet the requirements for appropriate WG funding required to provide the necessary site infrastructure for future private and public sector commercial /industrial investment. As such WG considers its proposals for this site are viable and deliverable within the next Plan period and would meet all the tests for soundness required for inclusion within the LDP. WG has allocated funding to commence with a masterplanning exercise for the site during 2020-2022, subject to the LPA either allocating the site within the deposit LDP, or allowing the site to come forward earlier within the plan process based on its own merits. This is an objection against Policy SP6 in that the site does not form part of the Plan's employment allocation - site reference is AS/086/\*\*

*Council's Initial Response*

**Disagree.**

**There is sufficient employment land allocated within the area. Nevertheless, the Council will continue to work with the respondent to meet the employment needs of Llanelli and the Plan area, as well as those of the wider region, including the City Deal area.**

**Policies within the Plan are in place that make provision for potential employment proposals on sites that are adjacent to development limits such as this.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4473 Calon Cymru Network CIC (Dr Pat Racher) [5222]**

**Support**

*Summary:*

Calon Cymru welcomes the statement in SP6, Employment and the Economy, to "allow appropriate small scale employment opportunities and rural enterprises in the countryside to support rural communities and to deliver a diverse and sustainable rural economy".

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

**Policy EME1: Employment- Safeguarding of Employment Sites**

*Representation(s)*

**4215 Tata Steel Europe Limited ( \_ \_ \_ ) [5156] Object**

**Agent: Turley Associates Ltd (Abi Roberts) [4717]**

*Summary:*

The Policy sets out criteria where, exceptionally, proposals which result in the loss of employment sites is acceptable. The wording to that policy does not make it clear whether all or some of the criteria need to be met. This should be clarified. It is considered that only some of the criteria would need to be met as not all the criteria would be relevant to every

*Council's Initial Response*

**Disagree.**

**The wording of the policy is sufficiently clear in that all the criteria need to be considered and met.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4483 Cllr Tina Higgins [2920] Object**

*Summary:*

This is an area of land situated off an unclassified road known as Heol Ddu. The land is close to Teglan Park a large housing estate leading off from Penygarn Road. Although the land is currently a site for factories, the land has planning permission for residential properties. I would prefer that this area is used for residential purposes due to its close proximity to residential properties.

*Council's Initial Response*

**Noted.**

**The identification of the site as existing employment is reflective of the current activity. Should an alternative use be proposed then this would be considered against the policies and provisions of the Revised LDP and any other material considerations.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3392 Mr Enzo Sauro [4962] Support**

**Agent: Geraint John Planning Ltd (Mr Luke Grattarola) [685]**

*Summary:*

Support for policy EME1: Employment - Safeguarding of Employment Sites:

The above policy is supported, particularly in relation to a site identified within the Plan as being safeguarded for existing employment uses.

The particular site is located along Heol Croppin, Dafen. F.R.E.D.S Timberframe Ltd are in the process of preparing a pre-app and subsequent planning application for a timber frame production facility to be located on the site. The viability and policy compliance of this are discussed in attached evidence.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4211 Tata Steel Europe Limited ( \_ \_ \_ ) [5156] Support**

**Agent: Turley Associates Ltd (Abi Roberts) [4717]**

*Summary:*

The respondent's client welcomes the designation of the Trostre Steelworks as an existing employment site. Tata also welcome the support for employment related proposals within this area which allows for the extension and / or intensification of existing employment enterprises.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4216 Tata Steel Europe Limited ( \_ \_ \_ ) [5156] Support**

**Agent: Turley Associates Ltd (Abi Roberts) [4717]**

*Summary:*

Support is given to criterion (f) which allows uses which are complementary to the primary employment use of the surrounding area. This recognises that non B-class uses and ancillary uses can be appropriate for locations within an employment site. Examples (not exhaustive) of such uses could include those relating to education or visitor centres.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

**Policy EME2 Employment - Extensions and Intensification**

*Representation(s)*

**4214 Tata Steel Europe Limited ( \_ \_ \_ ) [5156]**

**Support**

***Agent: Turley Associates Ltd (Abi Roberts) [4717]***

*Summary:*

Tata also welcome the support for employment related proposals within this area which allows for the extension and / or intensification of existing employment enterprises.

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*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**



**Policy EME3: Employment Proposals on Allocated Sites**

*Representation(s)*

**3478 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830] Object**

*Summary:*

The following provisions are applicable to all individual development plots located within allocated employment sites:

\* We will work with your authority to support sustainable economic development, however your authority and potential developers should be aware that the obligations of a water and sewerage undertaker extends to 'domestic' supplies only. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Dwr Cymru Welsh Water.

\* The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands in order to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage modelling assessments to be undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify and required infrastructure improvements.

\* Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).

\* Welsh Water has rights of access to its assets at all times. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.

\* If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.

*Council's Initial Response*

**Comments noted.**

**The local planning authority will continue to work closely with the respondent.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3881 Welsh Government (Mr Mark Newey) [13]**

**Object**

*Summary:*

Category B - Employment Allocations

The employment allocations listed in Policy EME3 are largely made-up of parcels of land within strategic and local employment sites. Whilst the Welsh Government does not object to the principle of this approach, there does not appear to be any evidence supporting the choice of employment allocations in the plan. Neither the Employment Land Review (ELR) nor the two-county economic study identify local employment sites that are suitable for allocation. The Council must clearly explain the rationale for identifying the employment allocations in Policy EME3 based on sector growth and demand and site delivery and availability over the plan period.

*Council's Initial Response*

**Agreed in part.**

**The distribution of employment sites within the County is reflective of and in accordance with the spatial strategy of the Plan. In this regard they have specific reference to the sustainability objectives of the Revised LDP and seek to focus employment growth within established and identified centres. In this regard it should be noted that 70.39ha of employment land is allocated within the three main principal centres of Llanelli, Carmarthen and Ammanford/Cross Hands. In most cases the allocations are logical extensions to the existing sites or consolidations on existing employment areas able to benefit from the infrastructure already in place.**

**The identification of sites for allocation whilst informed by the evidence base cited by the respondent as well as the Plans spatial strategy are subject to individual site proformas. This will be supplemented by evidence which further develops the rationale for their identification including sector growth and demand.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4593 Ceredigion County Council (Anjuli Davies) [5303] Object**

*Summary:*

The Council supports the identification of an employment allocation in Llanybydder and would welcome the identification of such provision within the service centre of Newcastle Emlyn, although the identification of existing employment sites on the maps is recognised.

*Council's Initial Response*

**The distribution of employment sites within the County is reflective of and in accordance with the spatial strategy of the Plan. In this regard they have specific reference to the sustainability objectives of the Revised LDP and seek to focus employment growth within established and identified centres.**

**Whilst Newcastle Emlyn has no specific employment allocations, it is considered that the settlement is well served by existing employment sites, which are safeguarded in the Plan. The Revised LDP supports the provision of new employment opportunities across the settlement hierarchy and within our rural market towns. In this respect the Plan makes provision for the consideration of proposals on a case by case basis maximising opportunities for employment and job creation. Such an approach provides an appropriate level of flexibility in responding the needs of its communities.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3785 Mr G Lewis [5058] Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Objection to Policy EME3.

Seeking inclusion of site solely for employment use under policy EME3. The site was previously proposed for mixed use with the candidate site reference SR/031/002.

*Council's Initial Response*

**There is sufficient and more suitable land allocated within the settlement to accommodate new economic growth. Potential proposals for employment related uses on this site will be dealt with under the policies in the Plan.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3682 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Support**

*Summary:*

NRW provide an analysis of the allocations and there are no objections, other than 2 sites (see reps 3683 and 3685). NRW have confirmed that this analysis can be logged and responded to within the LDP Infrastructure Assessment with regards to all regeneration and mixed use sites comments they make, other than these 2 specific objection sites - (see reps 3683 - prc3/E2 and 3685 prc3/E4 ).

*Council's Initial Response*

**Support welcomed.**

**The objections to two specific sites under this policy have been dealt with under separate representation numbers.**

*Action*

**No change to the Plan.**

**Paragraph EME3: Employment Proposals on Allocated Sites , PrC2/E2**

*Representation(s)*

**3857 Peter Reynolds [5079]**

**Support**

**Agent: Geraint John Planning Ltd (Mr Luke Grattarola) [685]**

*Summary:*

The site is located within Dafen Park, an area made up of industrial units, justifying its use for industrial employment;  
The site is in close association and connection to Dafen, Felinfoel and Panteg where a range of services and facilities are located within convenient walking distance, demonstrating the sites accessibility;  
The sustainability and accessibility credentials of the site lend themselves to supporting employment development at this location;and  
It is considered that the inclusion of this land for employment development is compatible with the surrounding uses and will contribute positively to the local economy.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

**Paragraph EME3: Employment Proposals on Allocated Sites , PrC3/E1**

*Representation(s)*

**3930 Welsh Government (Mr Richard Jones) [2788]**

**Support**

*Summary:*

Site PRC3/E1 likely to access via the grade separated junction however it should be noted that this may require upgrading on the two county road dumbbell roundabouts. Such schemes may have an impact on the Cross Hands roundabout and this should be quantified in Transport Assessments with any necessary mitigation. Full delivery of the Economic Link Road (ELR) is also necessary.

*Council's Initial Response*

**Comments noted.**

**This strategic employment site has outline planning permission and further highway requirements will be taken into account at the detailed planning application stage.**

*Action*

**No change to the Plan.**

**Paragraph EME3: Employment Proposals on Allocated Sites , PrC3/E2, PrC3/E2**

*Representation(s)*

**3683 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

*Summary:*

Reservations regarding the employment allocation PrC3/E2 as it appears to provide important ecological connectivity features. Loss of ecosystem connectivity would be at odds with the fundamental aims of maintaining and enhancing biodiversity and Section 6, Part 1 of the Environment (Wales) Act 2016.

*Council's Initial Response*

**It is noted that the concerns raised relate only to a portion of the allocation. It is agreed that this element of the site will be removed from the allocation.**

**The local planning authority will continue to work closely with the respondent.**

*Action*

**Remove the portion of the allocation that is the subject of the ecological concerns.**

**This part will remain as white land within development limits.**

**Paragraph EME3: Employment Proposals on Allocated Sites , PrC3/E4, PrC3/E4**

*Representation(s)*

**3685 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

*Summary:*

Reservations regarding the employment allocation PrC3/E4 as it appears to provide important ecological connectivity features. Loss of ecosystem connectivity would be at odds with the fundamental aims of maintaining and enhancing biodiversity and Section 6, Part 1 of the Environment (Wales) Act 2016.

*Council's Initial Response*

**It is noted that the concerns raised relate only to a portion of the allocation. It is agreed that this element of the site will be removed from the allocation.**

**The local planning authority will continue to work closely with the respondent.**

*Action*

**Remove the portion of the allocation that is the subject of the ecological concerns. This part will remain as white land within development limits.**



## Policy Strategic Policy - SP 7: Welsh Language and Culture

### Representation(s)

**4033 Dyfodol (J W Thomas) [563]**

**Object**

#### *Summary:*

Mae Dyfodol i'r laith yn pryderu am rannau o'r Polisi Strategol SP7, megis "lliniaru effaith" adeiladu tai ar y Gymraeg. Gair arall am "lliniaru" yw "lleddfu" ac mae'r ddau'n cydnabod bod niwed wedi cael ei wneud, ac y byddai mesurau lliniaru neu leddfu yn ddull o geisio lleihau'r niwed. Fel y mae nifer o'r adrannau yn nogfennau'r sir yn dangos, nid yw'r Gymraeg mewn sefyllfa i ddioddef rhagor o niwed. Mae ymateb Dyfodol yr laith i'r syniad o liniaru yn y CDLI yr un peth ag yn y FfDC, hynny yw nid yr asbrin ar ôl cael strôc sydd ei angen, ond osgoi'r pwl yn y lle cyntaf.

Dyfodol i'r laith is concerned about parts of Strategic Policy SP7, such as "mitigating the impact" of house building on the Welsh language. Another word for "mitigation", is "alleviate" and both recognise that harm has been done, and mitigation or alleviation measures would be trying to reduce the harm. As several sections of the county's documentation show, the Welsh language is not in a position to suffer further harm. Dyfodol yr laith's response to the idea of mitigation in the LDP is the same as in the NDF - it's not the aspirin after the stroke that's needed but avoiding the attack in the first place.

*Council's Initial Response*

**Nodir y sylwadau.**

**Er bod y CDLI Adneuo a'r dystiolaeth ategol yn cyfeirio at liniaru, mae hefyd yn cyfeirio at gyfleoedd i wella. Mae llinell cyntaf polisi SP7 yn gweud "Mae'r Cynllun yn cefnogi cynigion datblygu sy'n diogelu, yn hyrwyddo ac yn gwella buddiannau'r Gymraeg a diwylliant Cymru yn y Sir."**

**Dylid nodi bod mesurau lliniaru yn cael eu hystyried yn hanfodol mewn sefyllfaoedd lle rhagwelir y bydd datblygiad yn cael effeithiau negyddol ac am y rheswm hwnnw nid yw'r Cyngor yn bwriadu cael gwared ar hyn fel gofyniad datblygiad a allai fod yn niweidiol. Fodd bynnag, rhagwelir y gall datblygiad hefyd gael effaith gadarnhaol ar y Gymraeg ac felly mae'r CDLI Adneuo wrth gyfeirio at yr angen i nodi cyfleoedd i wella yn ceisio harneisio'r canlyniadau cadarnhaol hyn.**

**Comments noted.**

**Whilst the Deposit LDP and the supporting evidence does refer to mitigation it also makes reference to opportunities for enhancement. The first line of SP7 states "The Plan supports development proposals which safeguard, promote and enhance the interests of the Welsh language and culture in the County".**

**It should be noted that mitigation is considered essential in situations where development is anticipated to have negative impacts and for that reason the Council does not propose to remove this as a requirement of potentially harmful development. However, it is anticipated that development can also have a positive impact upon the Welsh language and so the Deposit LDP in making reference to the need to identify opportunities for enhancement is seeking to harness these positive outcomes.**

*Action*

**Dim newid i'r Cynllun.**

**No change to the Plan.**



*Representation(s)***4600 Rhanbarth Sir Gâr Cymdeithas yr Iaith (Rhanbarth Sir Gâr) [2370]****Object***Summary:*

Er bod yr Arfarniad Cynaliawydd yn cyfeirio at "Asesiad Effaith ar yr Iaith Gymraeg, Rhagfyr 2019", ymddengys nad yw'r ddogfen honno ar gael fel rhan o'r ymgynghoriad. A yw'r Cyngor yn bwriadu cyhoeddi'r asesiad hwn, ac a fydd ymgynghoriad arall cyn i'r Awdurdod gyflwyno'r Cynllun Adneuo i Lywodraeth Cymru? Mae Deddf Cynllunio (Cymru) 2015 yn ei gwneud yn ofynnol i Arfarniadau Cynaliadwyedd Cynlluniau Datblygu Lleol gynnwys asesiad o effeithiau tebygol y cynllun ar y defnydd o'r Gymraeg yn ardal yr Awdurdod (A.11(3)). Nodwn unwaith yn rhagor y pryderon a fynegodd y Llywodraeth yn yr ymgynghoriad cychwynnol, er enghraifft: "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. 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. 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." Roedd y Cyngor am ymateb i bryderon Llywodraeth Cymru yn yr Arfarniad Cynaliadwyedd, meddai, ond mae'n anodd gweld sut yn union mae'r cwestiynau hyn wedi cael ei hateb. Ar ben hynny, mae'n amlwg nad yw'r Arfarniad Cynaliadwyedd yn waith gorffenedig, Mae'r adran am y Gymraeg yn cynnwys y frawddeg "Mwy i'w gynnwys o Bapur Pwnc y Gymraeg" (tudalen 158), er enghraifft.

Although the Sustainability Appraisal refers to a "Welsh Language Impact Assessment, December 2019", that document does not appear to be available as part of the consultation. Does the Council intend to publish this assessment, and will there be another consultation before the Authority submits the Deposit Plan to the Welsh Government? The Planning (Wales) Act 2015 requires the Sustainability Appraisals of Local Development Plans to include an assessment of the likely effects of the plan on the use of the Welsh language within the area of the Authority (S.11(3)). Once again we note the concerns expressed by the Government in the initial consultation, for example: "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. 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. 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." The Council wished to respond to the Welsh Government's concerns in the Sustainability Appraisal, it said, but it is difficult to see exactly how these questions have been answered. Furthermore, it is clear that the Sustainability Appraisal is not a finished piece of work. The Welsh language section contains the sentence "More to be included from the Welsh Language Topic Paper" (page 158), for example.



*Council's Initial Response*

**Nodir y sylwadau**

**Mae'r Asesiad o'r Effaith ar y Gymraeg (Rhagfyr 2019) wedi bod ar gael ar wefan y Cyngor fel rhan o sylfaen dystiolaeth y CDLI trwy gydol yr ymgynghoriad ar y CDLI Diwygiedig Adneuo.**

**Dylid hefyd cyfeirio at ymateb y Cyngor i sylwadau a gyflwynwyd ar yr Arfarniad Cynaliadwyedd / Asesiad Amgylcheddol Strategol.**

**Gellir cyfeirio at ymateb y Cyngor i sylwadau perthnasol eraill yn ymwneud â'r iaith Gymraeg - gan gynnwys cyfeirnodau rhif 4365 a 3849 (ymatebion y Cyngor at sylwadau ar Pennawd / Adran 8 y Cynllun).**

**Comments noted.**

**The Welsh Language Impact Assessment (December 2019) has been available on the Council's website as part of the LDP evidence base for the duration of the consultation on the Deposit Revised LDP.**

**Reference should also be made to the Council's response to comments submitted on the Sustainability Appraisal / Strategic Environmental Assessment.**

**Reference can be made to the Council's response to other relevant representations in regards the Welsh language - including reference numbers 4365 and 3849 (Council's responses to comments on Chapter / Section 8 of the Plan).**

*Action*

**Dim newid i'r Cynllun.**

**No Change to the Plan.**



**Representation(s)****4366 Welsh Government: Welsh Language Commissioner (Ms Meinir Jones) [5159]rt****Summary:**

Rydym yn croesawu'r Polisi Strategol ar y Gymraeg a Diwylliant sy'n nodi "Mae'r Cynllun yn cefnogi cynigion datblygu sy'n diogelu, yn hyrwyddo ac yn gwella buddiannau'r Gymraeg a diwylliant Cymru yn y Sir. Ni fydd cynigion datblygu sy'n cael effaith niweidiol ar fywiogrwydd a hyfywedd y Gymraeg a'i diwylliant yn cael eu derbyn oni bai y bydd modd o liniaru'r effaith. Bydd disgwyl i'r holl gynigion datblygu y mae WL1 yn berthnasol iddynt nodi mesurau sy'n gwella buddiannau'r Gymraeg a diwylliant Cymru." Rydym yn cytuno â bwriad y Cyngor i wneud y polisi'n berthnasol i'r sir gyfan, yn hytrach nag i feysydd penodol fel sy'n digwydd yn y Cynllun cyfredol.

We welcome the Strategic Policy on the Welsh Language and Culture which states that "The Plan supports development proposals which safeguard, promote and enhance the interests of the Welsh language and culture in the County. Development proposals which have a detrimental impact on the vitality and viability of the Welsh language and culture will not be permitted unless the impact can be mitigated. All development proposals subject to WL1, will be expected to identify measures which enhance the interests of the Welsh language and culture." We agree with the Council's intention to make the policy relevant to the whole county, rather than to specific areas as is the case in the current Plan.

**Council's Initial Response**

**Croesawir y gefnogaeth.**

**Gellir cyfeirio at ymateb y Cyngor i sylwad cyfeirnod rhif 3859 (ymatebion y Cyngor at sylwadau ar bolisi WL1).**

**Support welcomed.**

**Reference can be made to the Council's response to representation reference number 3859 (Council's responses to comments on policy WL1).**

**Action**

**Dim newid i'r Cynllun.**

**No change to the Plan.**

=====

**Representation(s)****4032 Dyfodol (J W Thomas) [563]****Support****Summary:**

Mae Polisi Strategol SP7 Y Gymraeg a Diwylliant Cymru a WL1 Y Gymraeg a Datblygiadau Newydd yn strategaethau sy'n gallu cyfrannu at lewyrch y Gymraeg yn y sir os ydynt yn cael eu gweithredu'n gywir.

Strategic Policy SP7 Welsh language and Culture and WL1 The Welsh language and New Developments are strategies which can contribute to the prosperity of the Welsh language in the county if they are properly implemented.

**Council's Initial Response**

**Croesawir y gefnogaeth.**

**Gellir cyfeirio at ymateb y Cyngor i sylwad cyfeirnod rhif 3859 (ymatebion y Cyngor at sylwadau ar bolisi WL1).**

**Support welcomed.**

**Reference can be made to the Council's response to representation reference number 3859 (Council's responses to comments on policy WL1).**

**Action**

**Dim newid i'r Cynllun.**

**No change to the Plan.**



## Paragraph Para 11.173

### *Representation(s)*

**4604 Rhanbarth Sir Gâr Cymdeithas yr Iaith (Rhanbarth Sir Gâr) [2370] Support**

#### *Summary:*

Mae Cymdeithas yr Iaith yn croesawu penderfyniad y Cyngor Sir ym mis Gorffennaf i ddynodi'r sir gyfan yn ardal yn ieithyddol sensitif ac i'r Gymraeg fod yn ystyriaeth gynllunio berthnasol ym mhob datblygiad o 10 tŷ neu fwy.

Cymdeithas yr Iaith welcomes the County Council's decision in July to designate the whole county as a linguistically sensitive area and for the Welsh language to be a material planning consideration in all developments of 10 or more houses.

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### *Council's Initial Response*

**Nodir y sywladau / croesawir y gefnogaeth.**

**Gellir cyfeirio at ymateb y Cyngor i sylwad cyfeirnod rhif 3859 (ymatebion y Cyngor at sylwadau ar bolisi WL1).**

**O ran maint datblygiad tai, dylid cyfeirio at Bolisi WL1 i gael eglurhad oherwydd mewn pentrefi cynaliadwy mae'r polisi'n berthnasol i 5 neu fwy nid dim ond 10 neu fwy.**

**Comments noted / support welcomed.**

**Reference can be made to the Council's response to representation reference number 3859 (Council's responses to comments on policy WL1).**

**In regards housing development size, reference should be made to Policy WL1 for clarification as in sustainable villages the policy applies to 5 or more not just 10 or more.**

### *Action*

**Dim newid i'r Cynllun.**

**No change to the Plan.**

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**Policy WL1: Welsh Language and New Developments***Representation(s)***3859 Welsh Government (Mr Mark Newey) [13]****Object***Summary:*

Category C - Policy WL1 Welsh Language and New Developments

As worded, the policy requires planning applications for windfall sites to be submitted with a Welsh Language Impact Assessment (WLIA). While the requirement to submit a Language Action Plan is sensible and in line with national policy, it is unclear why the LPA is seeking a WLIA on windfall sites over 10 units in Principal / Service Centres and on 5 or more homes in Sustainable Villages? The impacts of housing growth at specific locations on the Welsh Language (above the LPAs chosen threshold) should have been tested through the SA process. This is an excessive approach and requires justification / amendment in light of policy in TAN 20. The LPA has set a threshold of 5 units for large allocated and windfall sites across the County (para 11.83 of the Plan). The relationship between the threshold and Policy WL1 requires explanation. We have commented previously on the impacts of Welsh Language in Tier 4 settlements.

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*Council's Initial Response*

**Comments noted.**

**Whilst the Deposit Plan's Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) process and the Welsh Language Impact Assessment (WLIA - December 2019) takes account of overall growth and distribution it is difficult to assess the implications which windfall sites may have upon the Welsh language. An allowance can be made for these in terms of their scale and broad location, however, given that they are not allocations within the Plan there is significantly less certainty as to their individual size, location and timing of delivery.**

**Guidance in respect of the linguistic assessment of windfall sites is set out in Technical Advice Note 20 (2017) which notes the following:**

**"3.2.2 Applications to develop windfall sites should be assessed against the strategy and policies of an adopted development plan, and with regard to relevant national planning policies. When a LPA receives a proposal for a large development on a windfall site in an area it has defined as linguistically sensitive or significant, an assessment of the likely impact of the development on the Welsh language may be undertaken.**

**3.2.3 Large development would normally be defined as 10 or more residential dwellings or developments over 1,000 sq.metres or 1 hectare, but LPAs may set locally-appropriate thresholds in the LDP, based on evidence".**

**Paragraph 2.26 of the Deposit LDP's Topic Paper on The Welsh Language (August 2019) provides information in respect of local thresholds applied to the consideration of the Welsh language in planning applications as agreed by Carmarthenshire County Council's elected members in July 2019. These thresholds have been identified by Carmarthenshire County Council as appropriate and justified for the reasons set out within the Topic Paper. Furthermore, the nature of residential development in Carmarthenshire occurs over a wide variety and scale of sites. However, smaller sites comprising less than 10 new homes are prevalent across the County. Cumulatively, these sites can have significant impacts, particularly where they occur within smaller settlements which may be more sensitive to their impacts. It is therefore considered logical that a threshold of 10 and 5 for urban and rural areas respectively is retained for the purposes of this policy, and it is considered important to do so in order to ensure that the LDP's approach is in accordance with the County Council's approach.**

*Action*

**No change to the Plan.**



**Representation(s)****4368 Welsh Government: Welsh Language Commissioner (Ms Meinir Jones) [9159]****Summary:**

Mae'r ddogfen ymgynghori'n cyfeirio at Gynllun Gweithredu'r iaith Gymraeg, sef cynllun sy'n nodi'r mesurau i'w rhoi ar waith i ddiogelu, hyrwyddo a gwella'r Gymraeg, a sut mae'r datblygiad yn bwriadu gwneud cyfraniad cadarnhaol i grwpiau iaith yn y gymuned. Bydd angen i Gynllun Gweithredu'r iaith Gymraeg gynnwys mwy o wybodaeth a manylion am y mesurau lliniaru hyn a sut y mae'r Cyngor yn bwriadu eu rhoi ar waith ledled y sir. Bydd angen diwygio canllawiau cynllunio atodol y sir i gyd-fynd â'r Cynllun Datblygu newydd.

The consultation document refers to a Welsh Language Action Plan, namely a plan which sets out the measures to be taken to safeguard, promote and enhance the Welsh language, and how the development proposes to make a positive contribution to language groups in the community. The Welsh Language Action Plan will need to include further information and details on these mitigation measures and how the Council intends to implement them across the county. The county's supplementary planning guidance will need to be amended to accompany the new Development Plan.

**Council's Initial Response**

**Nodir y sylwadau.**

**Gellir cyfeirio at Atodiad 3 y Cynllun.**

**Bydd Canllawiau Cynllunio Atodol (CCA) newydd yn cael eu paratoi cyn cyflwyno'r cynllun i'w Archwilio i gefnogi polisiau'r CDLI a fydd yn nodi canllawiau ychwanegol mewn perthynas â pharatoi Cynllun Gweithredu'r iaith Gymraeg.**

**Comments noted.**

**Reference may be made to Appendix 3 of the Plan.**

**New Supplementary Planning Guidance (SPG) will be prepared ahead of the submission of the plan for Examination to support the LDP's policies which will set out additional guidance in respect of preparing a Welsh Language Action Plan.**

**Action**

**Dim newid i'r Cynllun (ond fe fydd y CCA yn cael eu paratoi cyn cyflwyno'r cynllun i'w Archwilio).**

**No change to the Plan (but the SPG will be prepared ahead of the submission of the plan for Examination).**



*Representation(s)*

**3360 Barratt David Wilson Homes (Mrs Francesca Evans) [4879]**

**Object**

*Summary:*

In summary, BDW objects to this policy which requires development proposals throughout the entire county to provide a Welsh Language Impact Assessment (for windfall sites) and a Language Action Plan (for allocated and windfall sites). These are considered to be very onerous requirements. A more reasonable approach would be to identify specific areas which are Welsh Speaking Strongholds in the county as advocated in TAN 20 'Planning and the Welsh Language' and PPW 10. Further justification is required for not defining specific areas for the application of this policy.

*Council's Initial Response*

**Disagree.**

**The policy is robust and sound.**

**Reference should be made to the evidence base of the Plan, including the Topic Paper on the Welsh Language (August 2019).**

**Reference is made to paragraph 11.175 of the deposit Plan - notably - "The need to safeguard, promote and enhance the Welsh language applies to developments proposed across the County and is not restricted to specific areas within the County".**

**Reference can be made to the Council's response to representation reference number 3859 (Council's responses to comments on policy WL1).**

*Action*

**No change to the Plan.**





**Representation(s)**

**4034 Dyfodol (J W Thomas) [563]**

**Support**

**Summary:**

Yn dilyn ymateb Cyfarwyddiaeth Gynllunio Llywodraeth Cymru, roedd Dyfodol i'r Iaith yn croesawu penderfyniad Cyngor y Sir ym mis Gorffennaf 2019 i ddynodi'r sir gyfan yn ardal o "sensitifrwydd ieithyddol" ac yn ogystal penderfynu bod "yr iaith yn ystyriaeth gynllunio berthnasol": -

- Ym mhob cais i adeiladu 5 neu ragor o dai mewn ardaloedd gwledig ac
- Ym mhob cais i adeiladu 10 neu ragor o dai mewn ardaloedd trefol... ledled y sir.

Mae'r polisi yn gam sylweddol i'r cyfeiriad cywir os yw'r Asesiad o'r Effaith ar y Gymraeg yn cael ei roi ar waith yn effeithiol.

Following the Welsh Government's Planning Directorate response, Dyfodol i'r Iaith welcomed the County Council's decision in July 2019 to designate the whole county as one of "linguistic sensitivity " and further to determine that "the language is a relevant planning consideration": -

- In all applications to construct 5 or more houses in rural areas and
- In all applications to build 10 or more houses in urban areas.... across the county.

The policy is a significant step in the right direction if the Impact Assessment on the Welsh Language is implemented effectively.

**Council's Initial Response**

**Croesawir y gefnogaeth.**

**Gellir cyfeirio at ymateb y Cyngor i sylwad cyfeirnod rhif 3859 (ymatebion y Cyngor at sylwadau ar bolisi WL1).**

**Support welcomed.**

**Reference can be made to the Council's response to representation reference number 3859 (Council's responses to comments on policy WL1).**

**Action**

**Dim newid i'r Cynllun.**

**No change to the Plan.**



**Representation(s)****4606 Rhanbarth Sir Gâr Cymdeithas yr Iaith (Rhanbarth Sir Gâr) [2370] Support****Summary:**

Credwn hefyd y gall y defnydd o Gynlluniau Gweithredu Iaith chwarae rhan hynod o bwysig wrth i'r Cyngor ystyried datblygiadau tai a datblygiadau diwydiannol neu fasnachol yn y dyfodol. Nodwn fod y Cyngor yn cytuno bod angen methodoleg ar gyfer asesu effaith datblygu ar y Gymraeg er mwyn cefnogi gweithrediad polisïau. Wrth reswm, mae amser yn brin, ac felly gofynnwn ar frys pryd caiff yr Aseiad o Effaith ar y Gymraeg ei gyhoeddi, ac a fydd ymgynghoriad ar y ddogfen honno? Hefyd, hoffem weld disgrifiadau manwl o'r Cynlluniau Gweithredu Iaith a'r fethodoleg y mae'r Cyngor yn bwriadu ei defnyddio ar gyfer asesu effaith datblygu ar yr iaith.

We also believe that the use of Language Action Plans can play an extremely important role as the Council considers future housing developments and industrial or commercial developments. We note that the Council agrees that a methodology is needed for assessing impact on the Welsh language from development to support policy implementation. Of course, time is short, and so we ask urgently when will the Welsh Language Impact Assessment be published, and whether there will be a consultation on that document? We would also like to see detailed descriptions of the Language Action Plans and the methodology that the Council intends to use for assessing the impact of development on the language.

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***Council's Initial Response***

**Nodir y sylwadau.**

**Mae'r Asesiad o'r Effaith ar y Gymraeg (Rhagfyr 2019) wedi bod ar gael ar wefan y Cyngor fel rhan o sylfaen dystiolaeth y CDLI trwy gydol yr ymgynghoriad ar y CDLI Diwygiedig Adneuo.**

**Bydd rhagor o dystiolaeth yn cael ei darparu cyn cyflwyno'r Cynllun i'w Archwilio. Mae hyn yn cynnwys adeiladu ar yr Asesiad o'r Effaith ar y Gymraeg (Rhagfyr 2019), ymgymryd â gwaith dadansoddi pellach o ran Rhagamcanion poblogaeth ac Aelwydydd / data mudo a hefyd diweddarau yr Astudiaeth Economaidd Dwy Sir ar gyfer Sir Gaerfyrddin a Sir Benfro (Hydref 2019). Bydd y diweddariad yma i'r Astudiaeth Economaidd yn rhoi ystyriaeth bellach i gysylltiadau rhwng y Gymraeg a'r economi yn y ddwy Sir.**

**Bydd canllawiau pellach ar gynnwys Cynlluniau Gweithredu yr Iaith Gymraeg yn cael eu darparu trwy Ganllawiau Cynllunio Atodol (dylid gyfeirio at ymateb y Cyngor i sylwad cyfeirnod rhif 4368 fel rhan o ymatebion y Cyngor at sylwadau a dderbyniwyd o dan bolisi WL1).**

**Comments noted.**

**The Welsh Language Impact Assessment (December 2019) has been available on the Council's website as part of the LDP evidence base for the duration of the consultation on the Deposit Revised LDP.**

**Further evidence will be produced ahead of the submission of the Plan for Examination. This includes building upon the Welsh Language Impact Assessment (December 2019), undertaking further analysis work in terms of population and household projections/ migration data and also updating the Two County Economic Study for Carmarthenshire and Pembrokeshire (October 2019). This update to the Economic Study will further consider the links between the Welsh language and the economy in the two Counties.**

**Further guidance on the content of Welsh Language Action Plans will be provided through Supplementary Planning Guidance (reference should be made to the Council's response to representation reference number 4368 as part of the Council's responses to comments received on policy WL1).**

***Action***

**Dim newid i'r Cynllun.**

**No change to the Plan.**



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## Paragraph Para 11.181

### *Representation(s)*

**4035 Dyfodol (J W Thomas) [563]**

**Support**

#### *Summary:*

Rydym yn croesawu'r pwyslais ar dai fforddiadwy, datblygu gwledig gofalus a mentrau megis Cartrefi Croeso. Yn wir, gallai'r Adran Gynllunio fod wedi elwa ar ddilyn patrwm y fenter Cartrefi Croeso ledled y sir yn hytrach na'r "uchelgeisiau strategol economaidd a chymdeithasol" sy'n ymddangos yn llawer rhy optimistaidd o ystyried yr ansicrwydd economaidd presennol.

We welcome the emphasis on affordable housing, careful rural development and initiatives such as Cartrefi Croeso. Indeed, the Planning Department could have benefited from following the pattern of the Cartrefi Croeso scheme across the county rather than the "strategic economic and social ambitions" which appear to be far too optimistic considering current economic uncertainty.

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### *Council's Initial Response*

**Nodir y sylwadau/ croesawir y gefnogaeth.**

**Comments noted / support welcomed.**

### *Action*

**Dim newid i'r Cynllun.**

**No change to the Plan.**

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## Policy Strategic Policy - SP 8: Infrastructure

### *Representation(s)*

**3489 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]**

**Object**

#### *Summary:*

We would be most grateful if you are able to refer to the DWMP programme in the supporting text to this policy. Refer to rep 3486 also.

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### *Council's Initial Response*

**Agreed.**

**Reference to the preparation of Drainage and Wastewater Management Plans to be inserted in the supporting text to Policy SP8.**

### *Action*

**Plan to be amended accordingly.**

**Insert new paragraph within the supporting text of Policy SP8.**

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*Representation(s)*

**3744 Cllr Anne Davies [5050]**

**Object**

*Summary:*

Objection to a specific issue, under Strategic Policy SP8 Infrastructure:

My only concern is for the sewage system which is overflowing, as both Welsh Water and the NRW know. Both have been involved with the situation at land at Cwm Coch and this needs to be addressed. Raw sewage is visible on the fields and cannot be farmed by livestock at present. Can you assure me that this will addressed before any further development?

*Council's Initial Response*

**Noted. No issues have been identified by the infrastructure providers.**

**However, any sewerage infrastructure issues would need to be addressed as part of any future planning application**

*Action*

**No change to the Plan.**

*Representation(s)*

**3370 Barratt David Wilson Homes (Mrs Francesca Evans) [4879]**

**Object**

*Summary:*

In summary, PPW 10 states that the economic viability of sites should be considered to ensure that the provision of community benefits would not be unrealistic or unreasonably impact upon a site's delivery. BDW Homes considers that this should also be included within the wording of this policy. Accordingly, the final paragraph of 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".

*Council's Initial Response*

**Disagree.**

**Paragraph 11.189 of the supporting text to Policy INF1: Planning Obligations clearly identifies that the financial viability of a proposed development will be taken into consideration.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3121 National Grid Company plc. (Avison Young) [4746]**

**Support**

*Summary:*

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

*Council's Initial Response*

**Support welcomed**

*Action*

**No action to be taken**

*Representation(s)*

**3688 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Support**

*Summary:*

Support the recognition given to the importance of infrastructure capabilities within the policy and supporting paragraphs.

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.

*Council's Initial Response*

**Support welcomed**

*Action*

*Representation(s)*

**3486 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]**

**Support**

*Summary:*

As outlined previously, 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.

With specific regard to water and sewerage infrastructure, where there is insufficient capacity and where no reinforcement works are programmed within the respective AMP Capital Investment Programme, the requisition provisions can be entered into for water and sewerage network infrastructure. The requisition provisions do not apply in the instance of wastewater treatment works (WwTW) and as such planning obligations or a commercial agreement may be necessary, as previously indicated.

Looking ahead, Welsh Water is embarking on the preparation of Drainage and Wastewater Management Plans (DWMPs) which Welsh Government may be minded to make statutory in due course. Growth information is built into our DWMP and forms an important element of our planning which aims to understand how we will continue to deliver effective sewerage services for a growing population in the face of climate change and other challenges. Critically the DWMP considers the impact of changing population served on our assets and the subsequent effect on the environment. As such we believe that the DWMPs will play a role in delivering a holistic, prioritised approach to the management of our drainage and sewerage network in the years ahead, and will complement other planning documents including your LDP2, the NDF, and SDPs. To maximise the potential benefits, we will work closely with Pembrokeshire and other LPAs in the preparation of our DWMPs. Refer to rep 3489 also.

*Council's Initial Response*

**Noted.**

**The Council will continue to work with the respondent as part of the preparation and implementation of the Revised LDP.**

**Reference is made to representation 3489.**

*Action*



*Representation(s)*

**3928 Welsh Government (Mr Richard Jones) [2788] Support**

*Summary:*

Overall support but it is noted that there's potential for cumulative impacts in locations such as Cross Hands, an opportunity to seek 106 contributions for any ongoing/future highway schemes.

*Council's Initial Response*

**Noted.**

**The implications of development on the highways infrastructure will be appropriately considered through the evidence as it develops through to examination. Provision for the use of Planning Obligations is made within the policies of the Plan.**

**The Council will continue to work closely with the respondent in preparation of the Plan and its implementation**

*Action*

**No change to the Plan.**

**Policy INF1: Planning Obligations**

*Representation(s)*

**3361 Barratt David Wilson Homes (Mrs Francesca Evans) [4879] Object**

*Summary:*

BDW considers that the wording of this policy should be in accordance with Circular 1/97 - it should state that planning obligations, where sought, must adhere to the tests of reasonableness, be justified, and directly related in scale and kind to the development proposed. BDW is aware that it is not the purpose of the LDP to repeat national planning guidance, however it is important that polices as significant as this should include an clarity that the benefits sought will meet the relevant tests.

*Council's Initial Response*

**Disagree.**

**As recognised by the respondent the Plan should not unduly repeat national policy or legislation. The provisions of circular 13/97 Planning Obligations and the Community Infrastructure Levy Regulations 2010 (as amended) as well as PPW are integral considerations at application stage and in the requesting of any planning obligations.**

**Reference should be had to paragraph 11.187 if the supporting text to Strategic Policy SP8 in so far as it links to a footnote guiding to these considerations. In this respect the Plan is intended to be read as a whole and not to be unnecessarily repetitive.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3874 Welsh Government (Mr Mark Newey) [13]**

**Object**

*Summary:*

Category B - With pooling restrictions on S106 agreements the Authority should ensure it is able to fund the necessary infrastructure requirements.

*Council's Initial Response*

**Comments Noted.**

**The Council is fully aware of the pooling requirements and has been operating within the provisions of the regulations since their implementation.**

**The Council awaits an update on any review of the CIL Regulations and the pooling restrictions following the devolution of such matters to the Welsh Government.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3690 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Support**

*Summary:*

We welcome the commitment to prioritise contributions with regard to the Caeau Mynydd Mawr SPG area, over others, for the sites subject to the requirements of Policy NE4.

*Council's Initial Response*

**Support Welcomed**

*Action*

**No change to the Plan**

*Representation(s)*

**3490 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]**

**Support**

*Summary:*

As indicated previously, where there is insufficient infrastructure capacity and development wishes to connect in advance of our AMP capital investment, planning obligations or a commercial agreement are the most appropriate way in ensuring delivery of necessary supporting infrastructure.

*Council's Initial Response*

**Noted.**

**The Council will continue to work closely with the respondent as part of the preparation and implementation of the Plan.**

*Action*

**No change to the Plan.**

**Policy INF2: Healthy Communities**

*Representation(s)*

**4491 Bethan Jones [5259]**

**Object**

*Summary:*

The plan makes requirements in respect of assessing the impact development has on the health and well being of our communities.

Horse riding is medium intensity exercise and for horse owners, includes maintenance of the horse and its environment and the physical activity required to provide for the needs of the equine on a daily basis, as well as having a positive impact on the mental health of the rider. CCC acknowledges the existence of differing needs of rural and urban communities but makes no mention of the equestrian communities that exist and that we are disadvantaged greatly by council policies.

Horse riders provide a significant input into the local economy that is reliant on the agriculture industry, supporting farming locally for horse accommodation, feed, land maintenance and other services.

**4501 Carmarthenshire Riders (Ms Karen Burch) [653]**

**Object**

*Summary:*

The plan makes requirements in respect of assessing the impact development has on the health and well being of our communities.

Horse riding is medium intensity exercise and for horse owners, includes maintenance of the horse and its environment and the physical activity required to provide for the needs of the equine on a daily basis.

CCC acknowledges the existence of differing needs of rural and urban communities but makes no mention of the equestrian communities that exist and that we are disadvantaged greatly by council policies.

Horse riders provide a significant input into the local economy that is reliant on the agriculture industry, supporting farming locally for horse accommodation, feed, land maintenance and other services.

*Council's Initial Response*

**Noted. The policy is not explicit in referencing or listing the nature of activities or pastimes. Consequently, it would be inappropriate to specifically amend the Plan in light of one particular activity irrespective of its value or otherwise.**

**The Plan makes reference to guidance in the form of SPG which will elaborate on the provisions of the Policy.**

*Action*

**No change to the Plan.**

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## Paragraph Para 11.195

### *Representation(s)*

**3159 Professor John Finney [4854]**

**Support**

#### *Summary:*

I support this strong emphasis on the requirement for an HIA w.r. to developments. However, the list of developments to which this requirement will affect seems rather limited. One can think of developments on smaller sites that could have significant negative physical and mental health effects that are on sites of less than one hectare - for example a single very large wind turbine. In order to protect health and wellbeing, this HIA requirement should apply more widely than listed here.

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### *Council's Initial Response*

**Support welcomed.**

### *Action*

**No change to the Plan.**

=====

## Paragraph Para 11.198

### *Representation(s)*

**3160 Professor John Finney [4854]**

**Object**

#### *Summary:*

The needs especially of small businesses run from home are not met if broadband provision is limited to developments of 100 or more homes. There should be an obligation to provide superfast broadband to all new developments.

---

### *Council's Initial Response*

**Agreed in part. The reference to FTTP being provided free of charge to housing developments with one hundred or more dwellings reflected the Fibre for developers' opportunities offered by openreach. However, it is recognised that this is a time limited statement and as such dates the Plan's content and its provisions.**

**In relation to the respondent's comments, the policy provides an ambitious and deliverable provisions consistent with the demands of communities and for a modern Wales. Further regard should be had to the Focused Changes and the proposed amendment to Policy INF3 in relation to the emerging Future Wales: The National Plan 2040 (National Development Framework).**

### *Action*

**Amend paragraph 11.198 reflect the potential for changes in the thresholds in the size of developments.**

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**Policy INF4: Llanelli Waste Water Treatment Surface Water Disposal**

*Representation(s)*

**3494 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]**

**Object**

*Summary:*

DCWW would suggest for clarity that the policy is reworded to "Llanelli Wastewater Treatment Works catchment surface water removal".

---

*Council's Initial Response*

**Agreed. Policy title to be reworded.**

*Action*

**Change to the Plan (Focused Change). The Council will also undertake any consequential amendment to the Burry Inlet Draft SPG as a result.**



**Representation(s)****3882 Welsh Government (Mr Mark Newey) [13]****Object****Summary:**

Category B - Policy INFA4 Llanelli Waste Water Treatment Surface Water Disposal

Development in the Llanelli Waste Water Treatment Works (WWTW) catchment area includes the centres of Llanelli and Burry Port and is subject to high level environmental considerations due to water quality in the Carmarthen Bay and Estuaries European Marine Site (CBEEMS). Whilst Welsh Water have confirmed there is capacity to accommodate planned growth in the Llanelli WWTW catchment area, this will be subject to a scheme of compensatory surface water removal on all major developments to protect the environmental quality of the CBEEMS. The Council emphasise this approach builds on established provisions in the Burry Inlet Memorandum of Understanding (MoU) last updated in September 2011 and to be replaced by a high level Statement of Common Ground (SoCG) between Natural Resource Wales (NRW), Welsh Water, Swansea and Carmarthenshire Councils. As the SoCG is yet to be finalised, the Council must ensure the approach set out in Policy INFA4 is robust and deliverable taking account of the cost of bespoke solutions on residential, employment and strategic sites in Llanelli and Burry Port.

The Council should also consider including key information from the draft SPG into Policy INFA4, such as the requirement for development proposals to submit drainage reports and criteria on piece-meal developments.

---

*Council's Initial Response*

**Comments noted.**

**A working group of officers from the Carmarthenshire County Council, the City and County of Swansea, Dwr Cymru Welsh Water and Natural Resources Wales are working on the Statement of Common Ground (SoCG) with a draft document already circulated. The SoCG will be finalised in time for the submission of the Plan.**

**Reference is made to the Council's response to representation reference number 3496 (see Council's responses to comments on para 11.203). where a focused change will be made introducing specific reference to the SoCG into the Plan, together with the partners involved.**

**The Council is satisfied that the approach set out in this policy is robust and deliverable. It should be noted that the Council has written to landowners /proponents of allocated sites explicitly identifying the requirements of Policy INF4, and its supporting SPG, where considered relevant.**

**Also, many of the allocations in the INF 4 WwTW catchment area already have permissions in place and /or are progressing on site.**

**The Council does not propose to move any further information from the SPG into Policy INF4 as matters of detail in terms of the implementation of the policy should be left in the SPG. It is considered that the Plan already has a sufficient 'policy hook' in place, with the SPG providing the detail on implementation.**

*Action*

**Continue with formulation of SoCG for completion in time for submission of the Plan to the Inspectorate (no change to the Plan).**



*Representation(s)*

4266 - RSAI - [4993]

Object

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

*Summary:*

The issue of foul water being treated at Llanelli WWTW is widely acknowledged. We consider this to be an impediment to the delivery of the large number of dwellings located in this catchment area. Whilst there may be a solution to each respective site, the issue is likely to cause a delay to the delivery of these sites and the added burden of the compensatory matters (in kind works or financial contribution) may have a consequential impact upon viability, meaning that affordable housing and other planning obligations cannot be delivered as the plan has envisaged. Has the mitigation been included in the Local Plan Viability Assessment? Have the impacted sites explained how they will overcome the issue in relation to their site? Reference is made rep 4240. Reference is also made to rep 4243 where the client's site is promoted.

*Council's Initial Response*

**Comments noted.**

**The Council is satisfied that the approach is robust and deliverable and will support the delivery of growth within the INF4 WwTW catchment area. In this regard, reference should be made to the Council's response to representation reference number 3882 as part of its responses to comments received on policy INF4.**

**As a cross reference note, the Council's response to the promotion of the client's site under representation reference number 4243 can be viewed under the Council's responses to comments received under policy HOM1. Also, the Council's response to the concerns raised in representation reference number 4240 can be viewed under the Council's responses to comments received under policy SP3.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3692 Natural Resources Wales (Miss Sharon Luke) [3253] Support**

*Summary:*

We support the inclusion of this policy and the supporting Burry Inlet SPG. As you know there has been a long-established partnership approach to dealing with concerns on the risk of deterioration of water quality on the Carmarthen Bay and Estuaries European Marine Site.

**3493 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830] Support**

*Summary:*

We welcome and are supportive of the provisions of this policy and the supporting text; moreover, we are pleased to note that the matter has been given its own specific policy. Refer to reps 3494,3495,3496 and 3497 in addition.

We have also prepared a consultation response to the Burry Inlet SPG which provides further detail on this matter.

*Council's Initial Response*

**Support welcomed.**

**The Council looks forward to continuing with the partnership approach with regards this matter.**

**Reference can be made in this regard to the Council's response to representation reference number 3882 which can be viewed under the Council's responses to comments on policy INF4.**

**Reference can also be made to the Council's response to the following representations :**

- 3494 (can be viewed under Council's responses to comments on policy INF4),**
- 3495 (can be viewed under Council's responses to comments on para 11.202),**
- 3496 (can be viewed under Council's responses to comments on para 11.203) and**
- 3497 (can be viewed under Council's responses to comments on para 11.204).**

*Action*

**No change to the Plan**





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## Paragraph Para 11.202

### *Representation(s)*

**3495 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]**

**Object**

#### *Summary:*

We would also suggest that in the final line of paragraph 11.202, the term "catchment" is used rather than "area".

---

### *Council's Initial Response*

**Agreed. Replace the word area with catchment.**

### *Action*

**Change to the Plan (Focused Change). The Council will also undertake any consequential amendment to the Burry Inlet Draft SPG as a result.**

---

## Paragraph Para 11.203

### *Representation(s)*

**3496 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]**

**Object**

#### *Summary:*

Regarding paragraph 11.203, we suggest that as well as Welsh Water, Natural Resources Wales (as well as Carmarthenshire County Council) are also a key organisation in the requirement to continue to request surface water removal and as such, we would suggest that the wording of this paragraph is amended to read as such.

---

### *Council's Initial Response*

**Agreed. Insert specific reference to the multi agency approach and the partners involved as well as the statement of common ground.**

**As a result, the Council also considers that a consequential addition (that points over to the paragraph 11.203 as amended) is required at the end of paragraph 11.207 to assist with cross referencing. (This is a Council change and not directly attributable to this representation made by DCWW).**

### *Action*

**Change(s) to the Plan (Focused Change(s)). The Council will also undertake any consequential amendment to the Burry Inlet Draft SPG as a result.**

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*Representation(s)*

**3693 Natural Resources Wales (Miss Sharon Luke) [3253] Support**

*Summary:*

Paragraph 11.203 states that Dwr Cymru Welsh Water (DCWW) have confirmed that there is sufficient capacity within Llanelli Waste Water Treatment Works to deliver the Plan's identified growth without breaching their permit requirements.

We acknowledge that in addition to the implementation of the requirements of the Memorandum of Understanding on new developments, a number of improvement schemes have also been undertaken within the catchment since it was introduced. We are satisfied that if DCWW have confirmed the above in writing, the Policy, with its requirements for surface water removal by the major developments, should ensure that the identified growth will cause no detriment to water quality from the generation of foul flows. As such we are in agreement with the conclusions of your HRA on this aspect.

---

*Council's Initial Response*

**Comments noted.**

**Reference should be made to the Council's response to representation reference number 3496 which is set out under the Council's responses to representations received to paragraph 11.203.**

*Action*

**No change to the Plan.**

=====  
**Paragraph Para 11.204**

*Representation(s)*

**3497 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830] Object**

*Summary:*

One further point of clarity regarding paragraph 11.204; we would suggest replacing the term "storm sewerage overflows" with "combined sewer overflows"

---

*Council's Initial Response*

**Agreed. Replace the term "storm sewerage overflows" with "combined sewer overflows"**

*Action*

**Change to the plan (focused change). The Council will undertake any consequential amendment to the Burry Inlet Draft SPG as a result.**

=====

## Paragraph Para 11.207

### *Representation(s)*

**3694 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Support**

#### *Summary:*

Subject to the response in respect of paragraph 11.203 (rep 3693 refers), we we are satisfied that the policy and Burry Inlet SPG supersede the requirements of the Memorandum of Understanding.

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### *Council's Initial Response*

**Comments noted.**

**Reference should be made to the Council's response to representation reference numbers 3693 and 3496 as part of the Council's response to comments received to Para 11.203.**

**It should be noted that the Council's response to representation 3496 (policy INF4) sets out the Council's rationale for additional 'cross referencing' text to be added into paragraph 11.207 as a focused change.**

### *Action*

**No change to the Plan as a representation - (however reference should be made to the Council's response to representation reference number 3496 as part of the Council's responses to comments received to Paragraph 11.203. Representation 3496 sets out the Council's rationale for a consequential focused change to paragraph 11.207 of the Plan due to a focused change to paragraph 11.203.**

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**Policy Strategic Policy - SP 9: Gypsy and Traveller Provision**

*Representation(s)*

**3875 Welsh Government (Mr Mark Newey) [13]**

**Object**

*Summary:*

Category B - Gypsy and Traveller Provision

The Council's approved 2016 Gypsy Traveller Accommodation Needs Assessment (GTANA) covers the period from 2016 to 2021. The 'updated' 2019 GTANA included as part of the Council's evidence base has not been approved by Welsh Ministers. To comply with legislation, planning policy and guidance a GTANA must be agreed by Welsh Ministers in advance of submitting the plan for examination covering the whole plan period from 2018 to 2033 with provision made for appropriate and deliverable sites in Policy SP9 to meet identified need within the required timescales. Failure to approve a GTANA and meet the required need is likely to result in the plan being unable to be found 'sound'. We would therefore urge the Council to work with our Communities Division to ensure an approved GTANA is submitted for examination.

*Council's Initial Response*

**Noted. The Council submitted the updated Gypsy and Traveller Accommodation Needs Assessment to the Welsh Government at the start of 2020, and we currently await a decision on its content.**

*Action*

**No change to the Plan**

**Paragraph Strategic Policy - SP 9: Gypsy and Traveller Provision, PrC2/GT1**

*Representation(s)*

**3695 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

*Summary:*

We have reservations - located partially in flood risk area. Southern boundary of the site is in zone C1. A small part of site in zone C2. Refer also to rep 3793 (comments on paragraph 11.468).

*Council's Initial Response*

**Noted. Site to be amended to remove the land located within the C1 and C2 flood risk zone and to ensure compliance with national planning policy (TAN 15 DAMs).**

*Action*

**Change to the Plan.**

*Representation(s)*

**3876 Welsh Government (Mr Mark Newey) [13]**

**Object**

*Summary:*

Category B - The SA/SEA has a negative appraisal of Gypsy and Traveller Sites listed in Policy SP9 as the allocations are affected by flooding in Zone C1 to varying degrees. TAN 15 categorises caravan parks as highly vulnerable development and this should only be identified in Zone C1 subject to application of the justification tests and site specific Flood Consequences Assessment (FCA) as set out in the SA/SEA. The views of statutory bodies, including NRW, must also be considered to demonstrate the sites comply with national policy and are deliverable.

*Council's Initial Response*

**NRW have responded citing reservations with part of the site falling within the C1 and C2 flood risk zone. This is noted, and an amendment to the site allocation is taken to ensure compliance with national planning policy (TAN 15 DAMs).**

*Action*

**Change to the Plan**

**Paragraph Strategic Policy - SP 9: Gypsy and Traveller Provision, PrC/GT2**

*Representation(s)*

**3697 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

*Summary:*

We have reservations - located partially in flood risk area. The North East boundary is in zone C1. Refer also to rep 3793 (comments on paragraph 11.468).

**3877 Welsh Government (Mr Mark Newey) [13]**

**Object**

*Summary:*

Category B - The SA/SEA has a negative appraisal of Gypsy and Traveller Sites listed in Policy SP9 as the allocations are affected by flooding in Zone C1 to varying degrees. TAN 15 categorises caravan parks as highly vulnerable development and this should only be identified in Zone C1 subject to application of the justification tests and site specific Flood Consequences Assessment (FCA) as set out in the SA/SEA. The views of statutory bodies, including NRW, must also be considered to demonstrate the sites comply with national policy and are deliverable.

*Council's Initial Response*

**Noted. The extension to the Penybryn Gypsy and Traveller site as referenced PrC2/GT2 is currently outside the TAN 15 C1 and C2 flood zones as delineated by the Development Advice Maps. As such it will remain allocated.**

**Further evidential work will be undertaken prior to the examination in to the revised LDP**

*Action*

**No change to the Plan.**

**Policy GTP1: Gypsy and Traveller Accommodation**

*Representation(s)*

**3886 Welsh Government (Mr Mark Newey) [13] Object**

*Summary:*

Category C - Policy GTP1 Gypsy and Traveller Accommodation

As worded, Criterion 2 (in part) is contrary to Welsh Government Circular 005/2018 as the text (in brackets) 'relating to need identified in settlement boundaries' acts against freedom of movement for Gypsy and Travellers who wish to develop their own sites. The text should be deleted accordingly.

*Council's Initial Response*

**Agreed. The wording that is in brackets within criterion 2 will be removed as a Focused Change.**

*Action*

**Change to the Plan.**

**Paragraph Para 11.219**

*Representation(s)*

**3698 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

The landscaping is to be carried out with appropriate native trees of local provenance. In the wake of ash dieback no ash should be introduced.

*Council's Initial Response*

**Agreed. Stipulate that in the wake of ash dieback, no ash trees should be introduced.**

*Action*

**Change to the Plan (Focused Changes)**

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## Policy Strategic Policy - SP 10: The Visitor Economy

### *Representation(s)*

**3987 Mr K Strelley [3923]**

**Object**

***Agent: JCR Planning Ltd (Mr Craig Jones) [4665]***

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

The designation of this established site as a tourism facility will provide certainty and clarity for future tourism proposals relating to this flagship enterprise. Its designation would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for wider economic activity. Its continued development would be in keeping and in character with the local area and will ensure a deliverable source of future economic growth. In addition, tourism development at this location would not be detrimental to the amenity of adjacent properties, would satisfy recognised sustainability objectives, would not have a detrimental impact on the landscape or nature conservation interests. Furthermore, the site is not impeded by any access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints and its delivery is assured. A full description of the site's development potential and merits has previously been provided in the candidate site submission, to which reference should be made. Objection to non allocation of candidate site SR/086/054 (site ref AS/086/054) as land allocated for tourism under policy SP10. Reference may also be made to representations 3988,3989,3990,3991.

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*Council's Initial Response*

The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence. (note this assessment referenced the Plan's evidence base - notably the Stage 1 SFCA).

The contribution of such facilities as this to the economy of the area is noted as is the fact that there is all year round provision (indoor offer) at the facility. However a notable consideration in regards the merits of allocating the site from a soundness perspective would be the prominence of the flood risk zone in this area as identified in the TAN 15 Development Advice Maps - C1 - and as such there is a concern at the soundness of allocating the site (see reference to Stage 1 SFCA above) even if a large portion of the site is not directly impacted by this zone.

The Council does however note the contribution of this facility and investment made. It is noted that the facility is largely established, with further investment planned.

Of notable interest to the Gateway Resort will be paragraph 11.240 of the Plan (notably the reference to 'dual use' and 'rainy day' attractions).

It is considered that there is ample provision in the Plan's policy framework, notably in regards the visitor economy, for further appropriate proposals to be considered at this location without allocating the site - particularly as it is largely established.

Reference can also be made to the Council's response to representations 3988 (policy VE1), 3989 (policy VE2), 3990 (policy VE3) and 3991 (policy VE4).

*Action*

**No change to the Plan.**





*Representation(s)*

**4493 Bethan Jones [5259]**

**Object**

*Summary:*

There is mention of important areas for cycling as a leisure activity, such as Pembrey and Brechfa Forest but these are important areas for horse riding too which has not been mentioned as important to the county.

Horse riders have to accommodate their horse in addition to themselves which provides increased income to tourism businesses and landowners.

The LDP should support provision of multi user routes for all non motorised users. Provision of routes to link up the fragmented bridleway network is required. Equine tourism should be supported with creation of bridleways accessible to walkers cyclists and riders which provides better value for money.

**4503 Carmarthenshire Riders (Ms Karen Burch) [653]**

**Object**

*Summary:*

There is mention of important areas for cycling as a leisure activity, such as Pembrey and Brechfa Forest but these are important areas for horse riding too which has not been mentioned as important to the county.

Horse riders have to accommodate their horse in addition to themselves which provides increased income to tourism businesses and landowners.

The LDP should support provision of multi user routes for all non motorised users. Provision of routes to link up the fragmented bridleway network is required. Equine tourism should be supported with creation of bridleways accessible to walkers cyclists and riders which provides better value for money.

*Council's Initial Response*

**Comments noted.**

**The text contained in the plan that is referred to by the respondent policy seeks to provide a scene setting exercise and as such there should be no concern as to the lack of specific reference to horse riding. The reference to cycling is specifically tied to the Cycling Strategy. Paragraph 11.227 of the Plan already references "The tourism offer within Carmarthenshire ranges from those natural features such as rights of way / walking to well-established renowned national attractions. The County's heritage and activity tourism potential is renowned, whilst its outstanding natural environment could appeal to the wellness tourism sector".**

**It is considered there is already sufficient scope within the Plan's policy framework to provide for the consideration of tourism related proposals with an equine focus. In this regard it is noted that Strategic Policy 10 supported by a range of detailed policies, notably within the context of this representation is Policy VE1: Visitor Attractions and Facilities.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3757 Ffos Las Ltd [3885]**

**Object**

**Agent: White Young Green (Mr Rob Mitchell) [2371]**

*Summary:*

Objection to Strategic Policy SP10.

Whilst the objectives of Strategic Policy SP10 are supported. The policy's reasoned justification should make direct reference to Ffos Las as a preferred location for new visitor economy related development. It is already a strategically important tourist destination and going forward its facilities and offer to the local visitor economy will need to be enhanced. The facility should be safeguarded and explicitly supported in policy wording.

Notwithstanding its countryside location, Ffos Las is a sustainable location from which to focus and deliver additional tourist related development, namely visitor accommodation; a need for which has been identified.

*Council's Initial Response*

**Disagree. The policy framework set out within SP10 allows the potential development for tourism and the visitor economy where it is appropriately located. Any proposals submitted will be considered against the revised LDP policies.**

*Action*

**No change to the Plan**

*Representation(s)*

**4130 Seasons Holidays plc (\_ \_ \_) [5149]**

**Object**

**Agent: Lichfields (Mr Owain Nedin) [4937]**

*Summary:*

That the Council fails to take opportunity to deliver on SO13 without any quantifiable or measurable targets for growth of the sector (which is a strategic/corporate objective). Evidencing/supporting this objective would logically be achieved through allocations for proposals that meet the strategic objective - particularly when one is presented that is deliverable and meets so many targets for growth of the visitor economy

*Council's Initial Response*

**It should be noted that the LDP is prepared within the context of other plans and strategies including those of the authority, whereby the need to reflect and support the visitor economy is identified. In this respect, the Plan through its policies and provisions provides sufficient clarity for the development of a tourism and visitor economy which is both deliverable and reflective of Carmarthenshire's aspirations.**

*Action*

**No change to the Plan.**

**Policy VE1: Visitor Attractions and Facilities**

*Representation(s)*

**3988 Mr K Strelley [3923]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to policy VE1 as part of the promotion of the client's site as a tourism allocation - reference should be made to representation 3987. The designation of this established site as a tourism facility will provide certainty and clarity for future tourism proposals relating to this flagship enterprise. Its designation would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for wider economic activity. Its continued development would be in keeping and in character with the local area and will ensure a deliverable source of future economic growth.

*Council's Initial Response*

**Reference should be made to the Council's response to representation number 3987 (under policy SP10).**

*Action*

**No change to the Plan.**

*Representation(s)*

**3485 Mrs Margaret Teal [4952]**

**Object**

*Summary:*

Objection to Policy VE1, in respect of Llanmiloe House.

My concerns regarding any further developments with in the grounds of Llanmiloe House:

1. Impact in Listed Building and conservation areas;
2. Added pressure on local services. The sewerage system is very dated, and there is currently a problem with surface water running into neighbours garden and onto the road.
3. Access to the proposed development would probably need to be from outside our property. This access has a reduced flow of traffic into what was the Social Club. The travelling of cars and the expected footfall of visitors would pose a significant risk to us as a family and those having access and egress from any potential site.

*Council's Initial Response*

**Comments Noted. In conjunction with other representations made in relation to development limits in this area of Llanmiloe, tourism proposals are not allocated on the proposals maps, and potential schemes / tourism developments are to be considered under policies set out within the Revised LDP and considered on a site by site basis.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3759 Ffos Las Ltd [3885]**

**Object**

**Agent: White Young Green (Mr Rob Mitchell) [2371]**

*Summary:*

Objection to Policy VE1.

Whilst the policy aspirations of Policy VE1 are supported, the Policy's reasoned justification should explicitly recognise development proposals which seek to diversify the offer and create jobs at existing tourist destinations in the countryside such as Ffos Las will, by their very nature, also need to be located in the countryside. We request the policy reasoned justification explicitly recognises Ffos Las as an existing, sustainable location/facility from which to provide visitor accommodation in association with fostering local tourist related activity.

*Council's Initial Response*

**Disagree. The policy framework set out within VE1 allows the potential development for tourism and Visitor attractions and facilities where it is appropriately located. Any proposals submitted will be considered against the revised LDP policies.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4137 Seasons Holidays plc ( \_ \_ ) [5149]**

**Object**

**Agent: Lichfields (Mr Owain Nedin) [4937]**

*Summary:*

The Council fails to take opportunity to deliver on SO13 without any quantifiable or measurable targets for growth of the sector (which is a strategic/corporate objective). Evidencing/supporting this objective would logically be achieved through allocations for proposals that meet the strategic objective - particularly when one is presented that is deliverable and meets so many targets for growth of the visitor economy

*Council's Initial Response*

**It should be noted that the LDP is prepared within the context of other plans and strategies including those of the authority, whereby the need to reflect and support the visitor economy is identified. In this respect, the Plan through its policies and provisions provides sufficient clarity for the development of a tourism and visitor economy which is both deliverable and reflective of Carmarthenshire's aspirations.**

*Action*

**No change to the Plan.**

**Policy Policy VE2: Permanent Holiday Accommodation**

*Representation(s)*

**3989 Mr K Strelley [3923]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to policy VE2 as part of the promotion of the client's site as a tourism allocation - reference should be made to representation 3987. The designation of this established site as a tourism facility will provide certainty and clarity for future tourism proposals relating to this flagship enterprise. Its designation would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for wider economic activity. Its continued development would be in keeping and in character with the local area and will ensure a deliverable source of future economic growth.

*Council's Initial Response*

**Reference should be made to the Council's response to representation number 3987 (under policy SP10).**

*Action*

**No change to the Plan.**

*Representation(s)*

**4472 Calon Cymru Network CIC (Dr Pat Racher) [5222]**

**Object**

*Summary:*

The proposals on tourism could be loosened to allow a greater dispersion of ultra-low-emission visitor accommodation in rural areas. Demand for socially distanced 'staycation' accommodation linked to 'active travel' is likely to rise, and Carmarthenshire is ideally located to benefit from this.

*Council's Initial Response*

**Comments noted.**

**The plan recognises that the County's rural areas are well placed to accommodate proposals for high quality and sustainable proposals that are of an appropriate scale. Proposals should however respect the County's assets whilst supporting vibrant rural communities.**

**It is considered there is already sufficient scope within the Plan's policy framework already in place, with Strategic Policy 10 supported by a range of detailed policies - including Policy VE2: Permanent Holiday Accommodation. In terms of the detailed policies for the Revised LDP, the emphasis is on providing clarification on two notable challenges and opportunities facing the visitor economy in Carmarthenshire which are attractions (somewhere to go) and accommodation (somewhere to stay).**

*Action*

**No change to the Plan.**

*Representation(s)*

**3760 Ffos Las Ltd [3885]**

**Object**

**Agent: White Young Green (Mr Rob Mitchell) [2371]**

*Summary:*

Objection to Policy VE2.

Whilst the policy aspirations of Policy VE2 are supported, the policy wording should not preclude new build development beyond defined settlements, as currently worded. The policy should be updated to reflect Policy VE1 which seeks a sequential approach to development.

The ability to diversify the tourist related offer and meet identified tourist needs (such as providing visitor accommodation) at existing facilities such as Ffos Las, which lies within the countryside, must not be precluded by unnecessarily rigid policy wording/approach; this would be of direct detriment to the Carmarthenshire visitor economy.

*Council's Initial Response*

**Disagree. Policy VE2 allows for the potential of new development and / or including appropriate extensions to existing accommodation where they are located within, or directly related to a defined settlement. Any proposals submitted will be considered against the revised LDP policies.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4132 Seasons Holidays plc (\_ \_ \_) [5149]**

**Object**

**Agent: Lichfields (Mr Owain Nedin) [4937]**

*Summary:*

The Council fails to take opportunity to deliver on SO13 without any quantifiable or measurable targets for growth of the sector (which is a strategic/corporate objective). Evidencing/supporting this objective would logically be achieved through allocations for proposals that meet the strategic objective - particularly when one is presented that is deliverable and meets so many targets for growth of the visitor economy

*Council's Initial Response*

**It should be noted that the LDP is prepared within the context of other plans and strategies including those of the authority, whereby the need to reflect and support the visitor economy is identified. In this respect, the Plan through its policies and provisions provides sufficient clarity for the development of a tourism and visitor economy which is both deliverable and reflective of Carmarthenshire's aspirations.**

*Action*

**No change to the Plan.**

**Policy Policy VE3: Touring Caravan, Camping and Glamping Sites**

*Representation(s)*

**3134 Mr HW Thomas [4850]**

**Object**

*Summary:*

I would appreciate if the area outlined in blue on the enclosed map could be considered for inclusion on to the Local development Plan. I live in the area hatched in purple. The reason for the request for this inclusion is that I am very interested in developing this area for Eco Tourism. Ideally, I would like to site four clamping pods on the field marked Pod area - Parking located adjacent to my house. Site ref is AS/127/005

*Council's Initial Response*

**The respondent is requesting the inclusion of the land for tourism use, such matters will be dealt with under the policies of the Plan and not specific allocations.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3990 Mr K Strelley [3923]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to policy VE3 as part of the promotion of the client's site as a tourism allocation - reference should be made to representation 3987. The designation of this established site as a tourism facility will provide certainty and clarity for future tourism proposals relating to this flagship enterprise. Its designation would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for wider economic activity. Its continued development would be in keeping and in character with the local area and will ensure a deliverable source of future economic growth.

*Council's Initial Response*

**Reference should be made to the Council's response to representation number 3987 (under policy SP10).**

*Action*

**No change to the Plan.**

*Representation(s)*

**4138 Seasons Holidays plc ( \_ \_ \_ ) [5149]**

**Object**

**Agent: Lichfields (Mr Owain Nedin) [4937]**

*Summary:*

The Council fails to take opportunity to deliver on SO13 without any quantifiable or measurable targets for growth of the sector (which is a strategic/corporate objective). Evidencing/supporting this objective would logically be achieved through allocations for proposals that meet the strategic objective - particularly when one is presented that is deliverable and meets so many targets for growth of the visitor economy

*Council's Initial Response*

**It should be noted that the LDP is prepared within the context of other plans and strategies including those of the authority, whereby the need to reflect and support the visitor economy is identified. In this respect, the Plan through its policies and provisions provides sufficient clarity for the development of a tourism and visitor economy which is both deliverable and reflective of Carmarthenshire's aspirations.**

*Action*

**No change to the Plan**

*Representation(s)*

**4612 Mr Dewi Rees [355]**

**Object**

*Summary:*

The respondent seeks glamping facilities on field number 2441 in Pontamman

*Council's Initial Response*

**The respondent has not provided a map to show the extent of the field to be considered. Notwithstanding this, the use proposed will be considered against the policies set out within the revised LDP.**

*Action*

**No change to the Plan.**



**Policy Policy VE4: Static Caravan and Chalet Sites**

*Representation(s)*

**3991 Mr K Strelley [3923]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to policy VE4 as part of the promotion of the client's site as a tourism allocation - reference should be made to representation 3987. The designation of this established site as a tourism facility will provide certainty and clarity for future tourism proposals relating to this flagship enterprise. Its designation would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for wider economic activity. Its continued development would be in keeping and in character with the local area and will ensure a deliverable source of future economic growth.

*Council's Initial Response*

**Reference should be made to the Council's response to representation number 3987 (under policy SP10).**

*Action*

**No change to the Plan.**

*Representation(s)*

**4139 Seasons Holidays plc ( \_ \_ \_ ) [5149]**

**Object**

**Agent: Lichfields (Mr Owain Nedin) [4937]**

*Summary:*

The Council fails to take opportunity to deliver on SO13 without any quantifiable or measurable targets for growth of the sector (which is a strategic/corporate objective). Evidencing/supporting this objective would logically be achieved through allocations for proposals that meet the strategic objective - particularly when one is presented that is deliverable and meets so many targets for growth of the visitor economy

*Council's Initial Response*

**It should be noted that the LDP is prepared within the context of other plans and strategies including those of the authority, whereby the need to reflect and support the visitor economy is identified. In this respect, the Plan through its policies and provisions provides sufficient clarity for the development of a tourism and visitor economy which is both deliverable and reflective of Carmarthenshire's aspirations.**

*Action*

**No change to the Plan.**

**Policy Strategic Policy - SP 11: Placemaking and Sustainable Places**

*Representation(s)*

**3699 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

Criterion c) should recognise the multi-functional nature of green infrastructure, as referenced in paragraph 11.269. It is not only about biodiversity and ecological connectivity, but also landscape, heritage, amenity, health and wellbeing, sustainable management of natural resources, climate adaptation and resilience.

*Council's Initial Response*

**Agreed. Multi-functional nature of GI to be referenced in SP11**

*Action*

**Change to the Plan (Focused change).**

*Representation(s)*

**3700 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

Criterion f), for greater clarity this section could include reference to the local landscape context and state new development should respond positively to local character.

*Council's Initial Response*

**Agree in Part. This point is addressed in policy PSD1. For clarity supporting text will be amended to refer to the local landscape context, and reference the Placemaking and Design SPG.**

*Action*

**Change to the Plan (Focused Changes)**

*Representation(s)*

**3525 Ms Sally Bere [3602] Object**

*Summary:*

Objection to criterion f of Policy SP11. A change to the wording is sought, as follows:

"Requirement for proposals to exhibit & demonstrate a clear understanding of the existing natural & built heritage , local character & sense of place".

*Council's Initial Response*

**Disagree.**

**The wording in this paragraph is considered to be sufficiently robust and in accordance with PPW.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3363 Barratt David Wilson Homes (Mrs Francesca Evans) [4879]**

**Object**

*Summary:*

BDW Homes objects to the current wording of this policy as it is considered that it currently suggests that developments are required to meet all of the 11 criteria listed in the policy. In reality, it is unlikely that this will be the case, which would make it difficult to justify a development proposal, accordingly the policy should be worded to make it clear that this is not the case.

*Council's Initial Response*

**Disagree.**

**The wording of the policy is sufficiently clear in that all the criteria need to be considered and met.**

**No change to the Plan.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3236 Ynni Sir Gâr (Dr Sioned Haf) [4872]**

**Support**

*Summary:*

- 1) Properties must achieve a 50% reduction of CO2 emissions compared to a similar building complying with Building Regulations Part L.
- 2) Carmarthenshire LA prohibit combustion heating systems in new properties built on sites identified in the LDP.
- 3) New buildings must have facilities enabling addition of EV charging point per household, and at every workplace/public car park.
- 4) Buildings on sites identified in the LDP are made energy self-sufficient, installing solar PV, district heating and linked to local community energy projects.
- 5) Council to engage with housing associations and industry experts to develop a construction model that will minimise cost of achieving the above.

*Council's Initial Response*

**Comments noted.**

**This is a strategic level policy dealing with sustainable places. The level of detail in respect of individual houses or housing estates highlighted in this representation will be dealt with at the planning application stage.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3346 RWE Innogy UK Ltd (Miss Eleri Davies) [471] Support**

*Summary:*

support recognition of low carbon and renewable energy generation under SP11, however the policy should be more explicit in its support, and recognise that proposals for low carbon and renewable energy generation are &quot;sustainable development&quot;. Notwithstanding this positive rhetoric, the Renewable and Low Carbon Energy Assessment: Carmarthenshire County Council (AECOM, June 2019) which is part of the evidence-base to this Revised LDP totally fails to recognise the scale of the 2050 net zero challenge and identifies very little in terms of the potential for further deployment of low carbon and renewable energy.

*Council's Initial Response*

**Comments noted.**

**The policy wording is considered to be robust and in accordance with national policy.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3498 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830] Support**

*Summary:*

We specifically welcome the inclusion of criteria k) 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.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3290 Pembrokehire Coast National Park Authority (Ms Martina Dunne) [2326] Support**

*Summary:*

Support in Principle Policy SP11 Placemaking and Sustainable Places.

A small number of comments are provided below:

Climate Change

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.

This NPA supports the approach taken to future-proofing communities in light of predicted sea-level rise and the identification of a Coastal Change Management Area, supported by the South Wales Shoreline Management Plan.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

**Paragraph Para 11.268**

*Representation(s)*

**3520 Ms Sally Bere [3602]**

**Object**

*Summary:*

Throughout this plan, whenever, Sustainable development principles are stated, economic development/ prosperity are given precedence & are stated first. I would ask that these references are amended throughout the plan to afford equal weight across the sustainable development principles. Para should read: 11.268 ... "seek to improve" ADD 'equally' " the economic, social, environmental and cultural well-being of an area.

*Council's Initial Response*

**Disagree. While the Authority seeks equity in the economic, social, environmental, and cultural well-being of an area, 'equally' is not always feasible or desirable. Remediation measures to address inequality in the distribution of Sustainability goals sometimes necessitate greater benefits in one aspect over another.**

**The order of listing Sustainability principles is maintained for consistency however, the Plan makes no actual or implied statement on economic imperatives taking precedence over social and environmental issues.**

*Action*

**No change to the Plan**

---

**Paragraph Para 11.269**

*Representation(s)*

**3521 Ms Sally Bere [3602]**

**Object**

*Summary:*

Throughout this plan, whenever sustainable development principles are stated, economic development/ prosperity are given precedence & are stated first. I would ask that these references are amended throughout the plan to afford equal weight across the sustainable development principles. Para 11.269 should read: " Vision of creating " ADD 'equally' "prosperous, cohesive and sustainable communities ."

---

*Council's Initial Response*

**Disagree. Reference is made to response made under 3520.**

*Action*

**No change to the Plan**

---

**Paragraph Para 11.271**

*Representation(s)*

**3522 Ms Sally Bere [3602]**

**Object**

*Summary:*

Throughout this plan, whenever sustainable development principles are stated, economic development/ prosperity are given precedence & are stated first I would ask that these references are amended throughout the plan to afford equal weight across the sustainable development principles. Para 11.271 should read: "to ensure that development proposals can achieve" ADD 'equally' " positive economic, social, environmental and cultural outcomes.."

---

*Council's Initial Response*

**Disagree. Refer to response made under 3520.**

*Action*

**No change to the Plan**

---

**Paragraph Para 11.272**

*Representation(s)*

**3499 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]**

**Support**

*Summary:*

On the theme of SuDS, we welcome the inclusion of the supporting text at paragraphs 11.272 to 11.274 regarding the recently established SuDS Approval Boards (SABs).

---

*Council's Initial Response*

**Support welcomed.**

*Action*

**No Change to the Plan.**

---

### Paragraph Para 11.273

*Representation(s)*

**3500 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830] Support**

*Summary:*

On the theme of SuDS, we welcome the inclusion of the supporting text at paragraphs 11.272 to 11.274 regarding the recently established SuDS Approval Boards (SABs).

---

*Council's Initial Response*

**Support welcomed.**

*Action*

**No Change to the Plan.**

=====

### Paragraph Para 11.274

*Representation(s)*

**3501 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830] Support**

*Summary:*

On the theme of SuDS, we welcome the inclusion of the supporting text at paragraphs 11.272 to 11.274 regarding the recently established SuDS Approval Boards (SABs).

---

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

=====

### Policy PSD1: Sustainable and High Quality Design

*Representation(s)*

**3701 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

Criterion e) iii) should be re-worded. It will not be possible to retain and protect all the existing landscape in new proposals.

We suggest: Proposals should clearly demonstrate: e) a high-quality landscape and built environment which iii) retains and protects key features and characteristics and integrates positively with the surrounding landscape and built environment.

---

*Council's Initial Response*

**Agreed. Re-wording of PSD1 criterion e) iii) for greater clarity**

*Action*

**Change to the Plan (Focused Changes)**

=====

*Representation(s)*

**3362 Barratt David Wilson Homes (Mrs Francesca Evans) [4879] Object**

*Summary:*

BDW Homes objects to the current wording of this policy as it is considered that it currently suggests that developments are required to meet all of the 9 criteria listed in the policy. In reality, it is unlikely that this will be the case, which would make it difficult to justify a development proposal, accordingly the policy should be worded to make it clear that this is not the case.

*Council's Initial Response*

**Disagree.**

**The wording of the policy is sufficiently clear in that all the criteria need to be considered and met.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3526 Ms Sally Bere [3602] Object**

*Summary:*

The supporting text to policy PSD1 must make clear that these are matters which relate to whether a proposal is or is not, acceptable in principal. The requirement must, therefore be satisfied by evidence based submissions at the very earliest stages in the planning process, and cannot be satisfied by imposition of conditions on consents, requiring the relevant information to be submitted at a later date.

*Council's Initial Response*

**Comments noted.**

**The wording in this paragraph is considered to be sufficiently robust and in accordance with PPW. It is implicit that such considerations will be addressed at the planning application stage through reference to Design and Access Statements, and in reference to Policy PSD2.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3274 The Coal Authority (Melanie Lindsley) [4000] Support**

*Summary:*

The Coal Authority is pleased to note that Policy PSD1 is supported by explanatory text in respect of land instability as set out in these two paragraphs.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3291 Pembrokehire Coast National Park Authority (Ms Martina Dunne) [2326] Support**

*Summary:*

Support in principle Policy PSD1 Sustainable and High Quality Design.

A small number of comments are provided below:

Climate Change

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.

This NPA supports the approach taken to future-proofing communities in light of predicted sea-level rise and the identification of a Coastal Change Management Area, supported by the South Wales Shoreline Management Plan.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

**Paragraph Para 11.280**

*Representation(s)*

**3527 Ms Sally Bere [3602]**

**Object**

*Summary:*

Objection to paragraph 11.280, which should be amended to the following:

.."the policy seeks to respect, and where appropriate, protect the amenity of existing residents."

Delete "and where appropriate"

Reason: unnecessary watering down of policy objective. The wording already say "seeks to"

*Council's Initial Response*

**Disagree.**

**The wording in this paragraph is considered to be sufficiently robust in relation to the protection of the amenity of local residents.**

*Action*

**No change to the plan.**

---

## Paragraph Para 11.285

### *Representation(s)*

**3528 Ms Sally Bere [3602]**

**Object**

#### *Summary:*

Objection to paragraph 11.285, which should be amended as follows:

"Proposals for developments of over 100 homes will be required to have regard to the provisions of Policy PSD2: Masterplanning Principles" - amend to 50 homes in line with wording of policy PSD2 Reason: to provide clarity.

---

### *Council's Initial Response*

**Agreed.**

### *Action*

**Amend paragraph 11.285 to refer to 50 homes in line with Policy PSD2.**

=====

## Paragraph Para 11.287

### *Representation(s)*

**3273 The Coal Authority (Melanie Lindsley) [4000]**

**Support**

#### *Summary:*

The Coal Authority is pleased to note that Policy PSD1 is supported by explanatory text in respect of land instability as set out in these two paragraphs.

---

### *Council's Initial Response*

**Support welcomed.**

### *Action*

**No change to the Plan.**

=====

## Paragraph Para 11.288

### *Representation(s)*

**3275 The Coal Authority (Melanie Lindsley) [4000]**

**Support**

#### *Summary:*

The Coal Authority is pleased to note that Policy PSD1 is supported by explanatory text in respect of land instability as set out in these two paragraphs.

---

### *Council's Initial Response*

**Support welcomed.**

### *Action*

**No change to the Plan.**

=====

**Policy PSD2: Masterplanning Principles - Creating Sustainable Neighbourhoods**

*Representation(s)*

**3702 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

This policy requires amendment; it has to be ensured that, where significant wildlife interests are associated with the site, GI provides a resilient ecological network, which adequately protects and enhances the respective wildlife interests.

*Council's Initial Response*

**Agreed. Amendment to policy PSD2. Where significant wildlife interests are associated with the site, it has to be ensured that GI provides a resilient ecological network, which adequately protects and enhances the respective wildlife interests.**

*Action*

**Change to the Plan (Focused Changes)**

*Representation(s)*

**3529 Ms Sally Bere [3602] Object**

*Summary:*

Objection to Policy PSD2:  
Should not this policy also apply to land allocated for business development? In term of housing, what provision is the LPA going to make to ensure that developers do not just simply develop fewer housing units incrementally within the larger land allocations in order to side step these requirements?

*Council's Initial Response*

**Comment noted.**

**This policy relates specifically to housing developments. Business proposals are covered by other policies within the Plan.**

**The Policy sets a requirement to submit a comprehensive and integrated 'masterplan' for the entire site. If the developer wishes to develop the site on an incremental basis, then this will need to be detailed in the masterplan.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3364 Barratt David Wilson Homes (Mrs Francesca Evans) [4879] Object**

*Summary:*

BDW Homes objects to the proposed policy requirement to submit a comprehensive and integrated 'masterplan' for the entire site for proposals where the development is for 50 or more homes. BDW consider a more appropriate and reasonable threshold should be set at 100 or more homes. The policy threshold should be reconsidered accordingly.

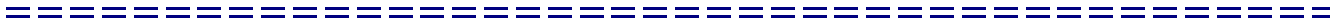
*Council's Initial Response*

**Disagree.**

**The identification of a threshold of 50 as set out within the provisions of PSD2 is reflective of the scale and nature of sites across the County. In this regard the scale and character of the settlements within the hierarchy are varied and often rely on smaller sites to deliver homes within their communities. Consequently, the application of the policy to sites of 50 or more ensures that the benefits of effective masterplanning is maximised at a level which is more reflective of the County, its settlements and its communities.**

*Action*

**No change to the Plan.**



**Paragraph Para 11.293**

*Representation(s)*

**3703 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

The supporting text needs to address the following:  
Where vegetation is being retained or recreated phasing must also consider:  
\* Ensuring that retained vegetation is protected throughout the construction period, and  
\* Where new habitat is being created and/or a green corridor for wildlife is being recreated it is part of the initial work on site due to the timeline involved for the habitats to become functional.

*Council's Initial Response*

**Agreed. Amendment of supporting text to address retained vegetation and habitat creation in development.**

*Action*

**Change to the Plan (Focused Changes)**



**Policy PSD3: Green Infrastructure Network**

*Representation(s)*

**3704 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

*Summary:*

One of the themes of the Area Statement is reducing health inequalities and developing and improving GI is believed to be a major factor in achieving this goal.

While we welcome the principle of "multifunctionality by bringing green infrastructure functions together", in some circumstances securing wildlife interests would not be compatible with other GI functions. Therefore, we advise this policy is amended.

They should take opportunities to achieve multifunctionality by bringing infrastructure functions together, where appropriate and where this will not compromise the purpose of the GI.

It also requires amendment as noted in Policy PSD2 above; it has to be ensured that, where significant wildlife interests are associated with the site, green infrastructure (GI) provides a resilient ecological network, which adequately protects and enhances the respective wildlife interests.

Where GI is being provided for the purpose of wildlife conservation, proposals must ensure that the GI will remain unilluminated.

*Council's Initial Response*

**Agreed. Amend policy to reference the SWWAS, and for the purpose of clarity amend wording relating to multifunctionality of GI.**

*Action*

**Change to the Plan (Focused Changes)**



*Representation(s)*

**3365 Barratt David Wilson Homes (Mrs Francesca Evans) [4879] Object**

*Summary:*

BDW Homes objects to this policy as currently worded. Green infrastructure requirements need to be balanced with achieving the most effective and efficient use of land, as advocated in PPW 10 (para 4.2.22). It is unclear how the authority has reconciled the effect on net developable area of the GI requirements set out in this policy and how this might impact on the density of development for example. BDW request that the wording of this policy is reconsidered.

*Council's Initial Response*

**Disagree.**

**Whilst the provisions of PPW in relation to making the most efficient use of land is recognised this is not a matter of either or. Rather PPW places significant emphasis on the requirement for Green Infrastructure. It is recognised that green infrastructure considerations are an integral part of the design process and incorporates a range of features, how these function together to contribute toward the quality of places and allows for a range of design based solutions which need not impact for example on the density of a development. In this respect the policy provides for the maximisation of Green Infrastructure as far as is practicable, this recognises the consideration of different scenarios and solutions.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3328 Mr Chris Davies [2969] Support**

*Summary:*

We fully support the ethos of PSD3: Green Infrastructure Network and consider that it will assist CCC and developers in achieving their duties under The Wellbeing of Future Generations (Wales) Act and the Environment (Wales) Act 2016.

*Council's Initial Response*

**Support Welcomed**

*Action*

**No change to the Plan**

*Representation(s)*

**3502 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]**

**Support**

*Summary:*

We welcome the provisions of this policy and the supporting text. The integration of SuDS as a Green Infrastructure asset in particular is something that we are particularly supportive of.

*Council's Initial Response*

**Support Welcomed**

*Action*

**No change to the Plan**

**Paragraph Para 11.296**

*Representation(s)*

**3530 Ms Sally Bere [3602]**

**Support**

*Summary:*

Support for paragraph 11.296, although I have concerns over what weight existing green infrastructure will be given in policy terms when weighed against other factors in development proposals. The overriding impression is that existing green infrastructure is & will, be too easily sacrificed; & I am highly sceptical that however ambitious relevant policy statements may be, replacement & new planting is highly unlikely to ever match that which is being lost in terms of quality, quantity & longevity.

*Council's Initial Response*

**Support welcomed and comments noted**

*Action*

**No change to the Plan**

**Paragraph Para 11.297**

*Representation(s)*

**3531 Ms Sally Bere [3602]**

**Support**

*Summary:*

Support for paragraph 11.297, although I have concerns over what weight existing green infrastructure will be given in policy terms when weighed against other factors in development proposals. The overriding impression is that existing green infrastructure is & will, be too easily sacrificed; & I am highly sceptical that however ambitious relevant policy statements may be, replacement & new planting is highly unlikely ever match that which is being lost in terms of quality, quantity & longevity.

*Council's Initial Response*

**Support welcomed and comments noted**

*Action*

**No change to the Plan**

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## Paragraph Para 11.298

### *Representation(s)*

**3705 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

#### *Summary:*

In respect to the comments on biodiversity, this section requires amendment:

- \* Use of emphatic language replacing should with will.
- \* Within the section it states that "Development proposals will conserve and enhance on-site biodiversity, and habitat networks within and adjacent to the site." To provide clarity to developers it should specifically set out the need for any application to detail how the development will deliver such conservation and enhancement.

---

### *Council's Initial Response*

**Agreed. Amend supporting text to provide clarity on development application criteria in relation to conservation and enhancement.**

### *Action*

**Change to the Plan (Focused Changes)**

=====

### *Representation(s)*

**3706 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

#### *Summary:*

In respect of the comments on climate change, the first prioritisation with regard to flood zones requires amendment. It states, "Within flood zones as identified by Natural Resources Wales". This should refer to areas considered to be at risk of flooding from any source.

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### *Council's Initial Response*

**Agree in Part. Amend wording of supporting text for clarity.**

### *Action*

**Change to the Plan (Focused Changes)**

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*Representation(s)*

**3532 Ms Sally Bere [3602]**

**Support**

*Summary:*

Support for paragraph 11.298, although I have concerns over what weight existing green infrastructure will be given in policy terms when weighed against other factors in development proposals. The overriding impression is that existing green infrastructure is & will, be too easily sacrificed; & I am highly sceptical that however ambitious relevant policy statements may be, replacement & new planting is highly unlikely ever match that which is being lost in terms of quality, quantity & longevity.

There also appears to be considerable overlap between policies relating to Green Infrastructure, Open Space, Landscape Character and Biodiversity (NE3 wildlife corridors). These should either be consolidated, or simplified to give a clearer focus.

---

*Council's Initial Response*

**Support welcomed and comments noted**

*Action*

**No change to the Plan**

=====

**Paragraph Para 11.299**

*Representation(s)*

**3533 Ms Sally Bere [3602]**

**Support**

*Summary:*

Support for paragraph 11.299, although I have concerns over what weight existing green infrastructure will be given in policy terms when weighed against other factors in development proposals. The overriding impression is that existing green infrastructure is & will, be too easily sacrificed; & I am highly sceptical that however ambitious relevant policy statements may be, replacement & new planting is highly unlikely ever match that which is being lost in terms of quality, quantity & longevity.

There also appears to be considerable overlap between policies relating to Green Infrastructure, Open Space, Landscape Character and Biodiversity (NE3 wildlife corridors). These should either be consolidated, or simplified to give a clearer focus.

---

*Council's Initial Response*

**Support welcomed and comments noted**

*Action*

**No change to the Plan**

=====

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*Representation(s)*

**3707 Natural Resources Wales (Miss Sharon Luke) [3253] Support**

*Summary:*

We support the commitment to produce a SPG and would welcome the opportunity to be involved in the process.

---

*Council's Initial Response*

**Support Welcomed**

*Action*

**No change to the Plan**

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**Policy PSD4: Green Infrastructure - Trees, Woodlands and Hedgerows**

*Representation(s)*

**3709 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

The South West Wales Area Statement recognises increasing woodland networks and having the right tree at the right place as important in achieving its theme of reducing the decline of and enhancing biodiversity. Management of woodland (along with grassland and peat) is also seen as a way forward in protecting our carbon sinks and mitigating and adapting to climate change. The plan should reflect a commitment to support delivery of these goals embedded within the Area Statement. See rep 3578 also.

---

*Council's Initial Response*

**Agreed. Amend policy to include a commitment to support delivery of the goals embedded within the Area Statement.**

**Cross reference note - the Council's response to representation reference number 3578 can be found under its responses to comments received under policy SP13.**

*Action*

**Change to the plan (Focused Changes)**

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*Representation(s)*

**3718 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

In the wake of ash dieback no ash should be planted.

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*Council's Initial Response*

**Agreed. Stipulate that in the wake of ash die back, no ash trees should be introduced.**

*Action*

**Change to the Plan (Focused Changes)**

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*Representation(s)*

**3719 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

The policy also states, "Tree survey information should be submitted with all the planning applications, where trees are present on site. The tree survey information should include protection, mitigation and management measures." This information must also include details of enhancement.

*Council's Initial Response*

**Agree in part. Stipulate that information provided in the application should include protection, mitigation, enhancement and management measures.**

*Action*

**Change to the Plan (Focused Changes)**

*Representation(s)*

**3720 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

Where new trees are to be planted management measures need to include a plan on how they will be protected and replaced should failure occur. There should be a commitment to an end product of mature long living trees.

*Council's Initial Response*

**Agree in part. Amend policy to include a commitment to maintain the habitat in the long-term.**

*Action*

**Change to the Plan (Focused Changes)**

*Representation(s)*

**3710 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

The policy states "Where there is unavoidable loss of trees on site, replacement trees will be required to be planted on site at a rate of two new trees for each tree lost. The planting of new, additional trees is also supported and encouraged as part of new developments". From our discussions we note that this policy is to be amended so that the number of replacements will be determined on a case by case basis."

*Council's Initial Response*

**Agreed. Amend policy to stipulate that replacement tree planting will be determined on a case by case basis.**

*Action*

**Change to the Plan (Focused Changes)**

*Representation(s)*

**3535 Ms Sally Bere [3602]**

**Object**

*Summary:*

Objection to Policy PSD4:  
Clarification on circumstances which might constitute "unavoidable loss" is required. At the moment submission of a planning application appears to be sufficient grounds for the LPA to justify loss of trees. Further changes also requested to policy & supporting text

*Council's Initial Response*

**Agree in part. Clarification on 'unavoidable loss' to be provided in supporting text  
11.304**

*Action*

**Change to the Plan (Focused Changes)**

*Representation(s)*

**3330 Mr Chris Davies [2969]**

**Support**

*Summary:*

We fully support the ethos of PSD4: Green Infrastructure - Trees, Woodland and Hedgerows and consider that it will assist CCC and developers in achieving their duties under The Wellbeing of Future Generations (Wales) Act and the Environment (Wales) Act 2016.

*Council's Initial Response*

**Support Welcomed**

*Action*

**No change to the Plan**

*Representation(s)*

**3708 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Support**

*Summary:*

We support the inclusion of this policy and the recognition of the importance of protecting these features. During our discussions we have expressed concern that development of a number of the allocated sites would not reflect your policy to retain and extend tree cover. This is concerning in light of Welsh Governments (WG) recent declaration on Climate Change and biodiversity.

*Council's Initial Response*

**Support Welcomed/ comments noted.**

**In respect of the concerns raised on sites allocated in the Plan, the Council has sought to respond as appropriate to any site specific objections made by the respondent - notably (but not exclusively) as part of its responses to comments made to Policy HOM 1 - Housing Allocations.**

**Reference can also be made to the proposed focused changes as appropriate.**

*Action*

**No change to the Plan**

*Representation(s)*

**3717 Natural Resources Wales (Miss Sharon Luke) [3253] Support**

*Summary:*

We are encouraged to note the reference to planting additional trees on new developments. As noted in paragraph 11.304, these should be of a native species of local provenance.

*Council's Initial Response*

**Support Welcomed**

*Action*

**No change to the Plan**

**Paragraph Para 11.302**

*Representation(s)*

**3715 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

It is stated that "Appropriate management measures must be implemented to protect newly planted and existing trees, woodlands and or hedgerows". This requires amendment to make it clear you are referring to long-term management not just the newly planted stage.

*Council's Initial Response*

**Agree in part. Amend wording to provide clarification on long-term and short-term measures.**

*Action*

**Change to the Plan (Focused Changes)**

*Representation(s)*

**3716 Natural Resources Wales (Miss Sharon Luke) [3253] Support**

*Summary:*

We are encouraged to note the reference to planting additional trees on new developments.

*Council's Initial Response*

**Support welcomed**

*Action*

**No change to the Plan**

**Policy PSD5: Development and the Circular Economy**

*Representation(s)*

**3366 Barratt David Wilson Homes (Mrs Francesca Evans) [4879] Object**

*Summary:*

BDW Homes objects to this policy and is concerned that it is very onerous and too aspirational as currently drafted. There are practical difficulties in complying with the policy insofar as the level of detail required would not be available at outline application stage, for instance details concerning proposed cut and fill. It is considered that the policy should be re-drafted/ reconsidered.

*Council's Initial Response*

**Disagree.**

**The wording of the policy reflects the Welsh Government's stance on moving towards embracing a more circular economy in Wales. The policy wording is considered to be sound and in accordance with PPW10.**

*Action*

**No change to the Plan.**

**Policy PSD7: Protection of Open Space**

*Representation(s)*

**3537 Ms Sally Bere [3602] Object**

*Summary:*

Objection to Policy PSD7. Additional criteria proposed:  
"Proposals which would reduce the quality of existing public access, including disabled access eg by introducing unnecessary steps or barriers or pinch points, will be refused."  
Amend:  
"It is demonstrated that there is provision of at least equivalent value available within the settlement, or appropriately accessible location; and,"  
To:  
'It is demonstrated that there is provision of at least equivalent value available within walking distance, or other nearby & appropriately accessible location; and,'  
Reason: to reduce unnecessary car journeys in line with the plan's overarching strategy/ objectives.

*Council's Initial Response*

**Disagree. There is difficulty in determining 'walking distance' as this will vary according to the disability. Reference is made to Para. 11.327 which sets out accessibility quantitatively measured in distance from home, and the quantity of provision according to function.**

*Action*

**No change to the Plan**

*Representation(s)*

**3288 Mr Graham Craig [4222]**

**Object**

*Summary:*

The designation on the proposals map only covers half of the community field, it stops randomly halfway across. I would like the map to be updated to extend the designation to the entire field. Llansadwrn community field (Outdoor sports facility) The designation on the proposals map only covers half of the community field, it stops randomly halfway across. I would like the map to be updated to extend the designation to the entire field. This is therefore an objection to policy PSD7, the site reference is AS/103/003

*Council's Initial Response*

**The plan does not have a specific annotation for community fields, so the field has been annotated as an outdoor sports facility - which essentially will provide it with the necessary protection from development.**

**The annotation covers the same area as shown in previous development plans (the current LDP and the earlier UDP) and reflects the information that we would have been provided with at the time of production of the earlier plans.**

**We have not received any information to update the situation, and so the existing extent of the annotation has been taken forward and identified in the Deposit Revised LDP.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4364 Llandyfaelog Community Council (Mr Arfon Davies,) [46]**

**Object**

*Summary:*

Objection to PSD7 - seeking annotation of the Play area to the rear of the Community Hall in Llandyfaelog

**4363 Llandyfaelog Community Council (Mr Arfon Davies,) [46]**

**Object**

*Summary:*

Objection to PSD7 - seeking annotation of the amenity greenspace field / outdoor sports field (football goals) which surrounds the play area in Llansaint.

*Council's Initial Response*

**Agreed. Amendment to be made to the proposal maps to identify the area as Open Space.**

*Action*

**Change to the Plan.**

*Representation(s)*

**3714 Ms Sally Bere [3602]**

**Object**

*Summary:*

On behalf of Friends of Jacksons Lane Garden Group, we would like to request that the area of Jackson's Lane Garden, Carmarthen (equating to the area of approved plans W/35554 & W/35973) should be formally identified as "Amenity Greenspace" or "Parks & Gardens" on the LDP's proposal map for Carmarthen & therefore afforded protection from future development through the relevant policies of the LDP.

It is understood that the Local Authority no longer intends to implement the approved redevelopment proposals relating to the Garden, which is located within a Conservation area. A number of reasons are cited in support of this including: the ability to facilitate grant applications to ensure its enhancement & future as a garden; it is the only remaining publicly accessible green space in the town centre; existing trees are of high amenity value; few of the surrounding flats & houses have gardens; the Lane falls within a Conservation area & is archaeologically sensitive with historic significance.

The Friends of Jackson's Lane Garden believe that it might eventually be included on the Register of Historic Parks & Gardens as small gardens have yet to be systematically identified & assessed. However, the area of the garden has been much reduced in modern times and its designation would depend on garden features being identified by further research & possibly the planned archaeological investigations, & subsequently restored.

*Council's Initial Response*

**Noted.**

**Whilst not identified on the proposals map the area referred to is referenced as part of the Green Infrastructure Assessment. This has been prepared in conjunction/support of the Revised LDP identifies the area as a Parks and gardens typology.**

**The Council will monitor any further development or implementation of proposals for the area.**

*Action*

**No change to the Plan.**





*Representation(s)*

**4379 Letitia Cornwallis Trust (Lynda James) [5161]**

**Object**

*Summary:*

Requests that the recreation/ open space allocation is set back to allow an access route along the western hedge to link the village hall car park and the Almshouse for future development or simply to better link the two sites together. The existing access to the school site has limited visibility and could limit the viability of the site and the conservation for the Almshouse.

This access would enhance the ability to renovate the deteriorating Grade 2 listed Georgian Almshouse, maintain its charitable objectives whilst also permitting the development of the site for sporting, heritage and other community activities based in the Charity School House as well as the spacious Village Hall. Successful implementation of such plans will not only enhance the sense of community lost through the closure of the local pub and school but also provide new employment opportunities for the community.

*Council's Initial Response*

**Agreed.**

*Action*

**The recreation/ open space annotation on the Proposals Map to be amended to allow an access route along the western hedge to link the village hall car park and the Almshouse.**

*Representation(s)*

**3247 Mr & Mrs O Arnott [4893]**

**Object**

*Summary:*

A Plot of land in public ownership as indicated on LDP map, needs to be amended (green lines removed) to reflect private ownership. Land registry title details are provided. It is intended to build a dwelling on this land in future. Therefore, Policy PSD7 is objected to due to the fact that the site is shown as open space in the deposit Plan. The site reference is AS/049/020.

**3782 Cllr. A & D Vaughan Owen & Price [5057]**

**Object**

*Summary:*

Objection to the inclusion of land in private ownership at Mary Street, Drefach, under Policy PSD7 Protection of Open Space.

The land is in private ownership, but on the map it is coloured in green (denoting a park/ open green space). We assume that this is an error, as Drefach Recreational Ground sits adjacent to it. We would therefore request that the 'park/ open green space' designation be removed from the land in question.

*Council's Initial Response*

**Agreed. The parcel of land in question should not be marked as open space**

*Action*

**Change to Plan. Amendment to remove open space allocation.**

*Representation(s)*

**3188 Mr Emyr John [4549]**

**Object**

*Summary:*

Site circled red - Requests the removal of Amenity Greenspace annotation.

*Council's Initial Response*

**Agreed. Amendment, to remove it's classification as Amenity Greenspace.**

*Action*

**Change to the Plan.**

*Representation(s)*

**4548 Philip Grice Chairman (Phil Grice) [5288]**

**Object**

*Summary:*

The Quay and the Quayside and the River Towy has in recent years become a hive of activity, especially regarding young people, for both recreational sporting activities, and educational river safety activities. We believe that the activities of these organisations demonstrate an enduring devotion by many people and organisations to the River Towy and the Quay, especially as far as young people are concerned, and that the formal identification in the LDP of the Carmarthen Quay and riverside as amenity land should ensure that this area should remain as a public amenity, and not an area for building development.

**4546 Philip Grice Chairman (Phil Grice) [5288]**

**Object**

*Summary:*

Land in the vicinity of the Quay Centre should be formally identified as amenity land in the LDP, i.e. not for building development. We consider that all access points to the river must be safeguarded and as amenity land it should be reserved for uses which require a water-side location, together with ancillary uses to meet the needs of all riverside recreational and boating users, including those walking the All Wales Coast Path, which runs through the site.

*Council's Initial Response*

**Disagree. The areas of concern of any development in this location will be matters taken into account in the consideration of any development proposals.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3335 Mr Chris Davies [2969]**

**Support**

*Summary:*

We fully support the ethos of PSD7 and more specifically the area of proposed PSD7 within Squirrel Walk, Fforest which would help maintain the semi-rural nature.

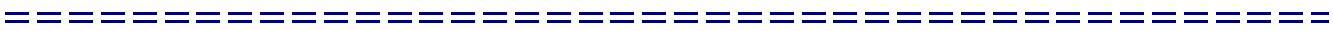
Should Carmarthenshire County Council decide to create a more formal recreational use for this area, a village green, allotment or plantation would be welcomed by ourselves which we consider would be in line with the well-being goals set out in The Wellbeing of Future Generations (Wales) Act including; A prosperous Wales, A resilient Wales, A healthier Wales, A Wales of cohesive communities and A globally responsible Wales.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3608 Mr Dennis Alexander [3310]**

**Support**

*Summary:*

Land between Heol Hafod Road & Heol Brown should be entirely outside the development area and should remain as recreation land. Therefore, Policy PSD7 is supported due to the fact that this land remains as recreation land in the deposit Plan. (when doing officer response refer to rep 3114 - delete this from summary then)

*Council's Initial Response*

**Support welcomed**

*Action*

**No action to be taken**



*Representation(s)*

**4347 Pencader Community Council (Anita Evans) [5158]**

**Support**

*Summary:*

Mae Cyngor Cymuned Llanfihangel-ar-Arth yn berchen ar Gornel Chwarae ar gyfer rhai dan 14 oed ym Mhencader. Ar hyn o bryd mae'r Man Chwarae hwn wedi'i anodi felly yn y CDLI.

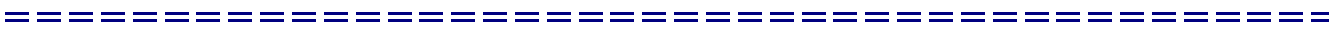
Llanfihangel-ar-Arth Community Council own a Play Corner for under 14s in Pencader. This Play Space is currently annotated as such in the LDP.

*Council's Initial Response*

**Nodwyd / Noted.**

*Action*

**Dim newid i'r Cynllun / No change to the Plan**



**Representation(s)**

**4481 Cllr Tina Higgins [2920]**

**Support**

**Summary:**

I fully support the protecting of green space in the Tycroes ward. Green spaces including woodland by Heol Brown Park/Hafod Road, Tycroes - All green spaces within the ward should be protected from development. Access to use these areas for recreational purposes is essential to the community to maintain and improve both physical and mental health well being. Nature is also a vital part of education. The woodland by Heol Brown park is home to a variety of wildlife e.g. foxes and badgers. Sightings also include a rare butterfly and owls who nest there. Residents state that this land was a gift from the Coal Board to the village of Tycroes to be used for recreational purposes. There is a further large area of green open land between Tycroes, Penybank and Pantyffynon. This area has footpaths that are used on a regular basis. Any building on this land would be detrimental to the rural feel of the area currently enjoyed by the residents.

**Council's Initial Response**

**Support welcomed. The area referred to has been identified as recreational/open space within the Revised LDP.**

**Action**

**No change to the Plan.**



**Policy PSD9: Advertisements**

*Representation(s)*

**4369 Welsh Government: Welsh Language Commissioner (Ms Meinir Jones) [5159]rt**

*Summary:*

Rydym yn croesawu'r cyfeiriad penodol at y Gymraeg yn y polisi ar hysbysebion PSD9. Byddai gennym ddiddordeb mewn gweithio gyda'r Cyngor wrth i geisiadau gael eu derbyn gan gwmnïau mawr a manwerthwyr. Gall ein Tîm Hybu ddarparu cyngor a chymorth i gwmnïau ddatblygu eu gwasanaethau Cymraeg a'u defnydd o'r Gymraeg yn fwy cyffredinol.

We welcome the specific reference to the Welsh language in the policy on PSD9 advertisements. We would be interested to work with the Council as applications are received from large companies and retailers. Our Hybu Team can provide advice and assistance to companies to develop their Welsh language services and their use of Welsh more generally.

*Council's Initial Response*

**Croesawir y gefnogaeth / nodir y sywladau.**

**Bydd y Cyngor yn paratoi Canllawiau Cynllunio Atodol (CCA) newydd.**

**Gellir cyfeirio at Atodiad 3 y Cynllun lle rhestrir CCA ar Hysbysebion (canllawiau ar ofynion dwyieithog).**

**Support welcomed/ comments noted.**

**New Supplementary Planning Guidance (SPG) will be prepared by the Council.**

**Reference may be made to Appendix 3 of the Plan where SPG on Advertisements (guidance on bi lingual requirements) is listed.**

*Action*

**Dim newid i'r Cynllun (ond fe fydd y CCA yn cael eu paratoi).**

**No change to the Plan (but the SPG will be prepared).**



**Policy PSD12: Light and Air Pollution**

*Representation(s)*

**3755 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

The supporting text for this policy also requires amendment. Reference is only made to international sites in this section, for example as in paragraph 11.355. The maintain and enhance requirement is also relevant to SSSI's and Section 7 priority habitats and species. The Plan should be amended to reflect this .

*Council's Initial Response*

**Agreed. Amend supporting text to clarify SSSI's, Section 7 priority habitats and species and the maintain and enhance requirement.**

*Action*

**Change to the Plan (Focused Changes)**

*Representation(s)*

**3752 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

This section needs to acknowledge that emissions in rural areas can impact the urban areas of the county. The plan as a whole must recognise that Wales is seeing an increase in intensive agriculture. In particular new pig and poultry units and increased densities of livestock on dairy farms. This can lead to increases in ammonia emissions to both air and water. Carmarthenshire has a wealth of designated sites and priority habitat and species, some of which are particularly sensitive to increases in ammonia emissions. A such, the plan needs to address this issue.

*Council's Initial Response*

**Agreed. In order to assess the acceptability of a development proposal against the criteria of Policy DM2, proposals which would be likely to result in increased nutrient loading to the environment, such as intensive livestock units, will be required to assess the potential impacts in respect of water and air quality, to ensure that they do not adversely affect these natural and semi natural environments. NRW publishes guidance for developers to assist with this process (see NRW OGN (Operational Guidance Note) 41: Assessment of ammonia and nitrogen impacts from livestock units when applying for an Environmental Permit or Planning Permission (March 2017) and NRW QG (Quick Guide) 9: Poultry Units: planning permission and environmental assessment).**

*Action*

**Change to the Plan (Focused Changes)**

*Representation(s)*

**3754 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

*Summary:*

The content of the Chief Planning Officers letter of 12 June 2018 on intensive agriculture requires your consideration. It states, "LPAs are advised to put in place appropriate policies in Local Development Plans in order to facilitate the sustainable consideration of this type of development." It should be made clear what the sensitive receptors are within the county and what will require buffering from such developments. This area should be strengthened in your final LDP. Consideration must be given not just to the red line boundary, but also the wastes arising, cumulative impacts and water quality.

*Council's Initial Response*

**Agreed. In order to assess the acceptability of a development proposal against the criteria of Policy DM2, proposals which would be likely to result in increased nutrient loading to the environment, such as intensive livestock units, will be required to assess the potential impacts in respect of water and air quality, to ensure that they do not adversely affect these natural and semi natural environments. NRW publishes guidance for developers to assist with this process (see NRW OGN (Operational Guidance Note) 41: Assessment of ammonia and nitrogen impacts from livestock units when applying for an Environmental Permit or Planning Permission (March 2017) and NRW QG (Quick Guide) 9: Poultry Units: planning permission and environmental assessment).**

*Action*

**Change to the Plan (Focused Changes)**

**Paragraph Para 11.344**

*Representation(s)*

**3724 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

*Summary:*

Consideration also needs to be given to the negative impacts light pollution can have on landscape character and visual amenity.

*Council's Initial Response*

**Agreed. Stipulate that consideration needs to be given to the negative impacts light pollution can have on landscape character and visual amenity.**

*Action*

**Change to the Plan (Focused Changes)**

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**Paragraph Para 11.347**

*Representation(s)*

**3725 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

The supporting text states that light pollution can impact on species and proposals should satisfy the policies and provisions of the plan as a whole. For clarity any development schemes need to be designed with lighting plans that ensure minimal or no light spill on any retained/ new / enhanced green infrastructure, especially linear habitats such as hedgerows, woodland, or vegetated stream corridors, as well as any bat roosts, their access points or known flight lines.

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*Council's Initial Response*

**Agreed. Amend supporting text to provide clarity on lighting plans within development schemes.**

*Action*

**Change to the Plan (Focused Changes)**

=====

**Paragraph Para 11.358**

*Representation(s)*

**3726 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

It is stated that "Work should not commence on site until appropriate remediation has been completed." Certain sites will be subject to long term monitoring requirement to confirm remediation is complete. For clarity, we request it is rephrased to 'until an appropriate stage of remediation as agreed has been completed' or alternatively that appropriate remediation is defined.

---

*Council's Initial Response*

**Agree. Amend text to clarify appropriate remediation requirement for development work to commence.**

*Action*

**Change to the Plan (Focused Changes)**

=====



**Policy Strategic Policy - SP 12: Rural Development**

*Representation(s)*

**4594 Ceredigion County Council (Anjuli Davies) [5303]**

**Object**

*Summary:*

Ceredigion County Council would welcome amendments to this policy to reflect the fact that a rural community is not necessarily bound by the County boundary for Carmarthenshire and should recognise the housing employment and social needs of communities which may extend into Ceredigion.

*Council's Initial Response*

**Disagree.**

**The Revised LDP recognises the close cross border relationship of the area to those communities in Ceredigion including the role that settlements such as Llandysul, Lampeter and Cardigan play to the communities in this area. It is not considered necessary to specifically focus reference to this policy rather the recognition is captured within the expression of the spatial strategy.**

**Appendix 2 identifies the Regional and Local context including those cross-border relationships. Note this appendix will be update ahead of adoption to reflect the most up to date position of the neighbouring authorities and their LDPs. Note at the time of writing there is no clarity on the extent of any cross-border impacts arising from proposals within the emerging Ceredigion replacement LDP.**

**The Council will continue to work closely with the respondent in the preparation and implementation of the Plan.**

*Action*

**No change to the Plan.**



**Representation(s)****3491 Cyng Jean Lewis [3601]****Support****Summary:**

LDPSP12, 11.364-11.381

Mae'n galonogol i weld bod y CLID Diwygiedig wedi cynnwys yr argymhellion a wnaed gan y Gweithgor Cefn Gwlad (11.367) a welir yn y Ddogfen Symud Sir Gâr Wledig Ymlaen, Dylid sicrhau bod y polisiau newydd yn bwrpasol ac yn adlewyrchu'r argymhellion yma ac os nad ydynt, dylir ffurfio rhai newydd. Gwelir `Symud Sir Gar Wledig Ymlaen', Adrannau: 3 Canfyddiadau ac Argymhellion - Pwynt 3. Cynllunio a Thai. Argymhellion 8-13.

It is encouraging to see that the Revised LDP has incorporated the recommendations made by the Rural Task Force (11.367) contained in the Moving Rural Carmarthenshire Forward document. It should be ensured that the new policies are bespoke and reflect these recommendations and if not, new ones should be formed. See 'Moving Rural Carmarthenshire Forward', Sections: 3 Findings and Recommendations - Point 3. Planning and Housing. Recommendations 8-13.

**Council's Initial Response****Croesewir Cefnogaeth.****Support Welcomed.****Action****Dim newid i'r cynllun.****No change to the Plan.****Policy RD2: Conversion and Re-Use of Rural Buildings for Residential Use****Representation(s)****3737 Mr Howard Edwards [5047]****Object****Summary:**

That criterion A of the proposed policy RD2 be removed to assist more rural buildings to be converted into much needed homes in rural parts of the County, something which is in line with the Council's rural development plans and aspirations for thriving and resilient rural communities:

This change is possible and in-line with Welsh Government policy as set out in Planning Policy Wales and Technical Advice Notes should the Council decide to do so.

**Council's Initial Response****Agreed. Criteria to be deleted A to be deleted.****Action****Change to the Plan.**

**Policy RD3: Farm Diversification**

*Representation(s)*

**3758 Ifan Beynon-Thomas [3198]**

**Object**

*Summary:*

Objection to policy RD3.

Whilst we support Policy RD3 (Farm Diversification) in principle as it provides the basis to promote the diversification of farms to the benefit of the rural economy, we consider that the policy should be tweaked so that the need for proposals to prioritise the conversion of existing buildings on the working farm is only considered where this is practicable.

The Policy should also be tweaked in relation to farm diversification uses that need to be situated away from the main farm complex for practical reasons.

We also consider that Policy RD3 should make it explicit that any tourism uses proposed on farms should be considered under policy RD3.

Suggested revisions to the wording of the policy are set out in the representation form.

*Council's Initial Response*

**Disagree.**

**The policy is implicit in its wording and offers sufficient flexibility in respect of the potential for new buildings where they can be justified, and are linked to the existing working farm complex.**

**Tourism uses which form an essential visitor based accommodation, such as caravan sites, are covered by other specific policies. Reference should be made to the specific policies relating to the visitor economy within the Plan.**

*Action*

**No change to the Plan.**

**Paragraph Strategic Policy - SP 13: Maintaining and Enhancing the Natural Environment**

*Representation(s)*

**3578 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

On March 31st we expect to publish the South West Area Statement. This will set the priorities to achieve the overall aim of building on the resilience of our ecosystems and enhancing the benefits they provide. Its content should be taken on board as you progress with the plan. Reversing the decline in biodiversity due to the risk from inappropriate management and destruction is an emerging theme in the statement. Also - see rep 3709

*Council's Initial Response*

**Agree. Reference to South West Wales Area Statement to be included.**

**(As a cross reference - the Council's response to representation 3709 can be referred to under the Council's response to representations received in respect of policy PSD4).**

*Action*

**Change to the Plan (Focused Changes) Relevant change to SP 13 in the plan**

*Representation(s)*

**3729 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

The supporting text as a minimum must include reference to the Chief Planning Officers letter dated 23rd October 2019 on Securing Biodiversity Enhancements.

*Council's Initial Response*

**Agree. Amend policy to reflect PPW10 and Chief Planning Officer (2019) guidance on securing biodiversity enhancements.**

*Action*

**Change to the Plan (Focused Changes)**

*Representation(s)*

**3732 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

While we note the policy refers to European designated sites, it does not mention SSSI's. The policy requires re-wording to address the protection of: Designated Sites including European sites and SSSI's

*Council's Initial Response*

**Agreed. Amend policy wording to allow inclusion of SSSI's.**

*Action*

**Change to the Plan (Focused Changes)**

**Representation(s)**

**3733 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

**Summary:**

While we note the policy refers to European designated sites it only refers to protected species in one instance. The policy requires re-wording to address Priority Habitats and Species.

**Council's Initial Response**

**Agreed. Amend policy wording to allow inclusion of Priority Habitats and Species.**

**Action**

**Change to the Plan (Focused Changes)**

**Representation(s)**

**3727 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

**Summary:**

We note that our previous recommendation for wording change has not been taken forward. The wording has not been changed as previously recommended. We remain concerned that the wording relies purely on reference to the natural environment through ecological connections. The natural environment also comprises geology, landform, soils, land cover, hydrology. The role ecological connections make in defining the landscape is important, but there are a number of natural environment aspects and features that require protection and enhancement. Possibly the title needs changing if this policy is concerned only with ecology and ecological connections.

**Council's Initial Response**

**Agreed. Amend policy to ensure that 'natural environment aspects and features' comprising geology, landform, soils, land cover and hydrology are also maintained and enhanced in addition to the ecological connections of the natural environment**

**Action**

**Change to the Plan (Focused Changes)**

**Representation(s)**

**3730 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

**Summary:**

Enhancement needs to be included as an aspect of the policy. As noted earlier, one of the Area Statement's themes' is reversing the decline of, and enhancing, biodiversity. Improving the connectivity and condition of habitats and species is paramount in achieving this goal.

**Council's Initial Response**

**Agreed. Reference to be made to the SWWAS and Chief Planning Officers letter dated 23rd October, 2019 in the supporting paragraph in regard to maintaining and enhancing the natural environment.**

**Action**

**Change to the Plan (Focused Changes)**

**Representation(s)****3186 Huw a Menna Watkins [2676]****Object****Summary:**

The Llŵchwr Valley was classed as a Special Landscape Area (SLA) in the Adopted LDP and wants to know why the Council is proposing to remove its SLA status in the Revised LDP. Such areas should be afforded more protection (not less) so that something is left unspoilt for the next generation. There is little access to the flood plain other than for farming purposes and that the slopes are sparsely settled with scattered farms. The characteristic of this SLA should be preserved, with its key vistas secured and protected. It is also claimed that this SLA acts as a preventative measure in the battle against climate change and it is thus argued that such areas need expanding and protected - not reducing.

**3127 Norman Wilkinson [2602]****Object****Summary:**

The Llŵchwr Valley was classed as a Special Landscape Area (SLA) in the Adopted LDP and wants to know why the Council is proposing to remove its SLA status in the Revised LDP. Such areas should be afforded more protection (not less) so that something is left unspoilt for the next generation. There is little access to the flood plain other than for farming purposes and that the slopes are sparsely settled with scattered farms. The characteristic of this SLA should be preserved, with its key vistas secured and protected. It is also claimed that this SLA acts as a preventative measure in the battle against climate change and it is thus argued that such areas need expanding and protected - not reducing.

**3133 April Jones [525]****Object****Summary:**

The Llŵchwr Valley was classed as a Special Landscape Area (SLA) in the Adopted LDP and wants to know why the Council is proposing to remove its SLA status in the Revised LDP. Such areas should be afforded more protection (not less) so that something is left unspoilt for the next generation. There is little access to the flood plain other than for farming purposes and that the slopes are sparsely settled with scattered farms. The characteristic of this SLA should be preserved, with its key vistas secured and protected. It is also claimed that this SLA acts as a preventative measure in the battle against climate change and it is thus argued that such areas need expanding and protected - not reducing.

*Council's Initial Response*

**Comments noted.**

**Special Landscape Areas (SLAs) are non-statutory designations and as such there is no requirement to designate them within an LDP. The LDP makes specific provision for the consideration of development proposals in relation to their specific landscape and visual characteristics in ensuring the ensuring the integrity of landscape character is maintained. Reference should be had to Policy BHE2: Landscape Character. Supplementary Planning Guidance will be developed to identify distinctive landscape character areas.**

**This reflects the LDP's approach of embedding an overarching emphasis on placemaking within the Plan as set out under the suite of policies under SP11: Placemaking and Sustainable Places. The Plan therefore makes provision for the consideration of matters in regards to design and placemaking as part of the consideration of development proposals, instead of specifically identifying SLAs. It should be noted that the Council will also be producing Supplementary Planning Guidance on Placemaking and Sustainable Places.**

*Action*

**No change to the Plan.**



**Representation(s)****4155 Dr Non Evans [3372]****Object****Summary:**

Ardal tirwedd arbennig Dyffryn Lluchwr:

Hoffwn gael esboniad i'r rhesymau pam mae ardal Cwm Lluchwr bellach wedi colli ei statws CLG? Fel yn y CDLI CCC blaenorol, roedd Cwm Lluchwr yn cael ei gategoreiddio fel tirwedd o bwys sylweddol (CLG) gyda'r angen i ddiogelu cymeriad cyffredinol CLG Cwm Lluchwr, fel y dyfynnwyd yn ffurflen asesu safle ar gyfer safle T3/7/H8, a hefyd ar wefan CCC ei hun. I ba bwrpas mae Cyngor Sir Gar eisiau newid / dileu y statws hwn? Onid fandaliaeth amgylcheddol, diwylliannol ac hanesyddol fyddai dileu'r statws - gyda'r bwriad o'i wneud hi'n haws datblygu'r tiroedd yn y dyfodol? Hoffwn i'r statws arbennig gael ei gadw.

Loughor Valley's Special Landscape Area:

I would like an explanation regarding why the Loughor Valley area has now lost its SLA status? As in the previous CCC LDP, Loughor Valley was categorized as a special landscape area (SLA) with the need to protect the overall character of the Loughor Valley SLA, as quoted in the site assessment form for site T3/7/H8, and also on CCC's website. Why does Carmarthenshire County Council want to change / remove this status? Wouldn't it be environmental, cultural and historical vandalism to remove the status - with the intention of making it easier to develop the lands in the future? I would like the special status to remain in place.



***Council's Initial Response*****Nodir y sylwadau.**

Mae Ardaloedd Tirwedd Arbennig yn ddynodiadau anstatudol, ac felly nid yw'n ofynnol eu dynodi mewn CDLI. Mae'r CDLI yn gwneud darpariaethau penodol ar gyfer ystyried cynigion datblygu mewn perthynas â'u tirwedd a'u nodweddion gweledol penodol gan sicrhau bod cymeriad y dirwedd yn cael ei gynnal yn ei gyfanrwydd. Dylid cyfeirio at Bolisi BHE2: Cymeriad y Dirwedd. Bydd Canllawiau Cynllunio Atodol yn cael eu datblygu i nodi ardaloedd cymeriad tirwedd unigryw.

Mae hyn yn adlewyrchu dull y CDLI o sefydlu pwyslais cyffredinol ar greu lleoedd yn y Cynllun fel y nodir o dan y gyfres o bolisiâu o dan SP11: Creu Lleoedd a Lleoedd Cynaliadwy. Felly mae'r Cynllun yn gwneud darpariaethau ar gyfer ystyried materion yn ymwneud â dylunio a chreu lleoedd fel rhan o'r broses o ystyried cynigion datblygu, yn lle nodi Ardaloedd Tirwedd Arbennig yn benodol. Dylid nodi y bydd y Cyngor hefyd yn llunio Canllawiau Cynllunio Atodol ar Greu Lleoedd a Lleoedd Cynaliadwy.

**Comments noted.**

Special Landscape Areas (SLAs) are non-statutory designations and as such there is no requirement to designate them within an LDP. The LDP makes specific provision for the consideration of development proposals in relation to their specific landscape and visual characteristics in ensuring the integrity of landscape character is maintained. Reference should be had to Policy BHE2: Landscape Character. Supplementary Planning Guidance will be developed to identify distinctive landscape character areas.

This reflects the LDP's approach of embedding an overarching emphasis on placemaking within the Plan as set out under the suite of policies under SP11: Placemaking and Sustainable Places. The Plan therefore makes provision for the consideration of matters in regards to design and placemaking as part of the consideration of development proposals, instead of specifically identifying SLAs. It should be noted that the Council will also be producing Supplementary Planning Guidance on Placemaking and Sustainable Places.

***Action***

**Dim newid i'r Cynllun.**

**No change to the Plan.**



*Representation(s)*

**3371 Barratt David Wilson Homes (Mrs Francesca Evans) [4879]**

**Object**

*Summary:*

BDW considers that the wording of this policy is too onerous, on the basis that para 6.4.3 of PPW10 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". PPW does not require all developments to secure enhancements to biodiversity, only to consider it. This recognises that enhancements to biodiversity interests may not always be feasible or appropriate. The wording of the first paragraph of this policy should therefore be amended to refer to securing enhancements "where appropriate."

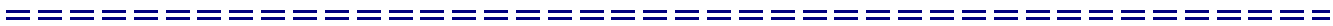
*Council's Initial Response*

**Disagree.**

**Any development proposals should contribute towards the overall aim of the South West Wales Area Statement (NRW, 2020) in building the resilience of our ecosystems and enhancing the benefits they provide. Reference is made to the duties and requirements of Section 6, of the Environment Act (Wales) 2016, and to Para 6.4.3 of PPW10 stipulation that SoNaRR, Area Statements and species records from Local Environment Centres should be taken into account.**

*Action*

**No change to the Plan**



*Representation(s)*

**3218 Mr Mike Pugh [2379]**

**Object**

*Summary:*

Now we have lost our SLA in the loughor valley, why? I fear Is this in preparation for further building above this river which has been continually flooded this winter ?.

I would also like an explanation of the loss of the SLA status of the loughor Valley , who decided this , was it the CCC or the Welsh Government.

*Council's Initial Response*

**Comments noted.**

**Special Landscape Areas (SLAs) are non-statutory designations and as such there is no requirement to designate them within an LDP. The LDP makes specific provision for the consideration of development proposals in relation to their specific landscape and visual characteristics in ensuring the ensuring the integrity of landscape character is maintained. Reference should be had to Policy BHE2: Landscape Character. Supplementary Planning Guidance will be developed to identify distinctive landscape character areas.**

**This reflects the LDP's approach of embedding an overarching emphasis on placemaking within the Plan as set out under the suite of policies under SP11: Placemaking and Sustainable Places. The Plan therefore makes provision for the consideration of matters in regards to design and placemaking as part of the consideration of development proposals, instead of specifically identifying SLAs. It should be noted that the Council will also be producing Supplementary Planning Guidance on Placemaking and Sustainable Places.**

*Action*

**No Change to the Plan.**

*Representation(s)*

**3161 Professor John Finney [4854]**

**Support**

*Summary:*

This is a strong statement that reflects the essential need to both protect and enhance the natural environment. The inclusion of ecological connection is to be welcomed.

**3728 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Support**

*Summary:*

We do however welcome the principle of this policy and acknowledge that an HRA has been undertaken to assess the impacts of the Plan on European Protected Sites (including the allocated sites).

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

---

**Paragraph Para 11.402**

*Representation(s)*

**3162 Professor John Finney [4854]**

**Support**

*Summary:*

Again this is a strong statement that reflects the aims of the Deposit LDP, and as I read it includes local sites and landscapes that may not have any designation but are of clear ecological value. For avoidance of doubt, it would be clearer if it was specifically stated that these local sites and landscapes were not limited to designated ones.

---

*Council's Initial Response*

**Support Welcomed**

*Action*

**No change to the Plan**

=====

**Policy NE2: Biodiversity**

*Representation(s)*

**3734 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

*Summary:*

Reference to Section 6 of the Environment (Wales) Act 2016, which relates to 'Biodiversity and resilience of ecosystems duty' must also be included.

---

*Council's Initial Response*

**Agree in Part - reference will be made to Section 6 of the Environment (Wales) Act 2016 in the supporting text as opposed the policy itself.**

*Action*

**Change to the Plan (Focused Change)**

=====

*Representation(s)*

**3408 Ms Sally Bere [3602]**

**Object**

*Summary:*

I would like to OBJECT to the extension of the property boundary at the rear of Woodlands, Springfield Rd, which would bring the development boundary right up to the edge of the Bluebell Woods which are both ecologically sensitive and of high landscape value. It would therefore be appropriate for this access/biodiversity corridor to be formally identified on the Proposals Map to ensure that it is safeguarded from inappropriate forms of development.

---

*Council's Initial Response*

**The objection to the development limits is dealt with under representation 3407. In terms of the identification of an access/biodiversity corridor to be identified on the Proposals Map, such areas are not specifically identified, they are protected through the policies contained in the Plan. Any proposals will be assessed against the policies of the Plan.**

*Action*

**No change to the Plan.**

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## Paragraph Para 11.411

### *Representation(s)*

**3740 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

#### *Summary:*

This states that full reference should be made to the Nature Conservation and Biodiversity SPG. We note that this document is still in draft version on your website. We note that the Report to Council 2016 (Agenda item 9.2) identifies amendments required for inclusion in the SPG. These amendments include replacing The Natural Environment and Rural Communities Act 2006 with the Environment Act. We understand that the document is to be updated and sent out to consultation at the Focused Changes stage of the plan preparation. You need to include reference to Chapter 6 of PPW 10th Edition and the Chief Planning Officers letter dated 23rd October 2019 on Securing Biodiversity Enhancements.

---

### *Council's Initial Response*

**Agreed. Nature Conservation and Biodiversity SPG to be published. Include reference to chapter 6 PPW10 and the Chief Planning Officers letter (2019) on securing Biodiversity Enhancements.**

### *Action*

**Change to the Plan (Focused Changes)**

=====

## Paragraph Para 11.413

### *Representation(s)*

**3741 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

#### *Summary:*

The text requires amendment. It states that "Where required, development proposals should seek to enhance biodiversity". Where required is not consistent with the Chief Planning Officer's letter entitled Securing Biodiversity Enhancements dated 23 October 2019. The letter states "where biodiversity enhancement is not part of an application, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise it will be necessary to refuse the permission".

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### *Council's Initial Response*

**Agreed. Amend wording of supporting text to ensure consistency with Chief Planning Officers letter (2019) entitled Securing Biodiversity Enhancements**

### *Action*

**Change to the Plan (Focused Changes)**

=====

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**Paragraph Para 11.416**

*Representation(s)*

**3163 Professor John Finney [4854]**

**Support**

*Summary:*

I support strongly this paragraph but, noting research that has been done over recent years on the effect of infrasound on health and wellbeing, to be consistent with the stress on health and wellbeing in the plan, infrasound should be added here.

---

*Council's Initial Response*

**Support welcomed and comments noted. . Para 11.416 references effects on biodiversity and not human health and wellbeing. Infrasound effect on biodiversity incorporated under noise pollution and vibration implications.**

*Action*

**No change to the Plan**

---

**Policy NE3: Corridors, Networks and Features of Distinctiveness**

*Representation(s)*

**3746 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

*Summary:*

The supporting text needs to provide clarification on the definition of exceptional circumstances in this context.

---

*Council's Initial Response*

**Agreed. Clarification of 'exceptional circumstances' to be provided in supporting text.**

*Action*

**Change to the Plan (Focused Changes)**

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*Representation(s)*

**3367 Barratt David Wilson Homes (Mrs Francesca Evans) [4879] Object**

*Summary:*

BDW Homes objects to this policy as it is currently worded. The expectation that development proposals should maintain and enhance ecological corridors, networks and features of distinctiveness needs to be balanced with achieving the most effective and efficient use of land, as supported by PPW10. As outlined in BDW's representations to Policy PDS3 (Green Infrastructure), it is unclear how the authority has reconciled the effect on net developable area of the requirements set out in this policy and how this might impact on the density of development for example. BDW request that the wording of this policy is reconsidered.

*Council's Initial Response*

**Disagree. The policy wording reflects the requirements of Section 6 of the Environment Wales Act 2016, the Chief Planning Officer's letter dated 23rd October 2019, and the Flood & Water Management Act, Schedule 3 (January 2019).**

*Action*

**No change to the Plan**

*Representation(s)*

**3164 Professor John Finney [4854] Support**

*Summary:*

While strongly supporting the strong statement in the first sentence, the second paragraph leaves the door open to developments without specifying the kinds of reasons that would be acceptable in outweighing the needs to safeguard the biodiversity and nature conservation interests. I realise this is often a matter of judgment, but some guidance here on how this delicate balance should be approached in considering a plea of exceptional circumstances would be helpful.

*Council's Initial Response*

**Support welcomed and comments noted.**

*Action*

**No change to the Plan**

**Paragraph Para 11.419**

*Representation(s)*

**3748 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

Please include scrub under features which contribute.

*Council's Initial Response*

**Agreed. 'Scrub' to be included among contributing features.**

*Action*

**Change to the Plan (Focused Changes)**

**Policy NE4: Development within the Caeau Mynydd Mawr SPG Area**

*Representation(s)*

**3751 Natural Resources Wales (Miss Sharon Luke) [3253] Support**

*Summary:*

We support the supporting SPG.

**3750 Natural Resources Wales (Miss Sharon Luke) [3253] Support**

*Summary:*

We support the inclusion of this policy.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan**

**Policy NE5: Coastal Management**

*Representation(s)*

**3756 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

Reference needs to be made to landscape and seascape character in this policy. This is relevant as the Carmarthen Bay, Gower and Swansea Bay Seascape Character Assessment has now been published.

*Council's Initial Response*

**Agreed. Amend policy to reference landscape and seascape character.**

*Action*

**Change to the Plan (Focused Changes)**

**Paragraph Para 11.427**

*Representation(s)*

**3762 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

To provide clarity we suggest this section is amended: New coastal management schemes or improvements to existing schemes will not be permitted for the purpose of enabling new development in areas of flood risk or coastal erosion.

*Council's Initial Response*

**Agreed. Amend to clarify that 'improvements to existing schemes' in areas of flood risk or social erosion are non permissible.**

*Action*

**Change to the Plan (Focused Changes)**



**Policy NE6: Coastal Development**

*Representation(s)*

**3763 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

Reference needs to be made to landscape and seascape character in this policy. This is relevant as the Carmarthen Bay, Gower and Swansea Bay Seascape Character Assessment has now been published

*Council's Initial Response*

**Agreed. Amend policy to specify that development must conserve and enhance landscape and seascape character.**

*Action*

**Change to the Plan (Focused Changes)**

**Policy NE7: Coastal Change Management Area**

*Representation(s)*

**3766 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

4. Extensions to Existing Dwellings and Infrastructure  
We question the inclusion of this policy. This could prolong the lifetime of dwellings in such areas thereby making it more difficult to relocate when needed.

*Council's Initial Response*

**Disagree.**

**The Plan makes appropriate provision for the ongoing needs of residents in ensuring properties remain habitable.**

*Action*

**No change to the Plan**

*Representation(s)*

**3765 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

3. Non-Residential Buildings - Point i gives examples including short let holiday accommodation, static and touring caravan sites and camping sites. We seek clarification as to why these are not treated as residential as they would be classified as highly vulnerable under TAN 15.

*Council's Initial Response*

**Agree, such uses should not have been included. Delete reference to "short let holiday accommodation, static and touring caravan sites and camping sites".**

*Action*

**Delete reference to "short let holiday accommodation, static and touring caravan sites and camping sites".**

*Representation(s)*

**3292 Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326] Support**

*Summary:*

A small number of comments are provided below.

Climate Change

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.

This NPA supports the approach taken to future-proofing communities in light of predicted sea-level rise and the identification of a Coastal Change Management Area, supported by the South Wales Shoreline Management Plan. A similar approach has been taken in Pembrokeshire Coast National Park. It appears in Carmarthen, however that the areas are not defined on a map, but by a verbal description based on Shoreline Management Plan areas of non-active intervention or Managed Realignment. The Shoreline Management Areas are generally linear in nature and so the LDP 2 would benefit from defining the full inland extent of the areas at risk.

*Council's Initial Response*

**Support welcomed.**

**Further information on the delineation of the extent of the areas will be provided.**

*Action*

**No change to the Plan**

**Paragraph Para 11.438**

*Representation(s)*

**3784 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

*Summary:*

For clarity, the supporting text requires strengthening: New residential development will not be supported in the Coastal Change Management Area.

*Council's Initial Response*

**Disagree, the wording is sufficiently clear.**

*Action*

**No change to the Plan.**

**Paragraph Strategic Policy - SP 14: Protection and Enhancement of the Built and Historic Environment**

*Representation(s)*

**3538 Ms Sally Bere [3602]**

**Object**

*Summary:*

Objection to Policy SP14. The wording should be revised as follows:

preserve or enhance, settings "where appropriate". Replace "where appropriate" with 'In determining development proposals which affect the setting of an archaeological site or monument, the LPA will have regard to Cadw's published Conservation Principles and guidance on Setting of Historic Assets May 2017.'

Reference should also be made in the supporting text to the LPA's requirement that applications affecting scheduled monuments must be accompanied by an appropriate scheduled monument consent from Cadw.

*Council's Initial Response*

**Disagree.**

**The wording in this policy and supporting text is considered to be sufficiently robust and in accordance with PPW.**

*Action*

**No change to the plan.**

**Paragraph Para 11.446**

*Representation(s)*

**3539 Ms Sally Bere [3602]**

**Object**

*Summary:*

Objection to Paragraph 11.446 which refers to "discovered & yet to be discovered archaeological remains" i.e unscheduled archaeological sites and areas of high potential. Neither categories are explicitly protected under the Ancient Monuments & Archaeological Areas Act (as amended by the Historic Environment (Wales) Act 2016).

*Council's Initial Response*

**Comments noted.**

**The supporting text in this paragraph merely seeks to highlight the importance of safeguarding the cultural integrity of the historic settlements, features and buildings within the Plan area and that our historic assets are irreplaceable resources and their conservation provides social, cultural, economic and environmental benefits.**

*Action*

**No change to the Plan.**

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**Paragraph Para 11.448**

*Representation(s)*

**3540 Ms Sally Bere [3602]**

**Object**

*Summary:*

Objection to Paragraph 11.448 which states that it does not "include policies in relation to facets of the built heritage such as Scheduled Monuments as they are adequately protected elsewhere." Scheduled monuments are not invariably tangible structures, and may present as earthworks, ephemeral features or even buried remains.

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*Council's Initial Response*

**Comments noted.**

**The wording in this paragraph is considered to be sufficiently robust, factually correct and in accordance with PPW.**

*Action*

**No change to the plan.**

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**Policy Policy BHE1: Listed Buildings and Conservation Areas**

*Representation(s)*

**3559 Mineral Products Association Wales (Mr Nick Horsley) [3778]**

**Object**

*Summary:*

Objection to subsections 2 and 3 of Policy BHE1:

It is not clear how the requirements of these subsections will be achieved. Maintaining the characteristic fabric of these buildings and conservation areas routinely requires an indigenous supply of local stone and materials, sympathetic to the character of the area and its buildings. There are no policies within the plan supporting the development of indigenous sources of building stone/materials.

Clarify within the plan how the characteristics of conservation areas and listed buildings will be maintained using materials sympathetic to the area. Sources of indigenous building materials will be needed and reflected within the policies in the plan.

---

*Council's Initial Response*

**Disagree.**

**In regard to criteria 2 and 3 of this policy, such matters would be taken into consideration at the planning application stage and would be determined on an individual basis.**

**In terms of the supply of indigenous sources of building stone/materials, such matters are covered under the minerals policies contained within the Plan, particularly SP18 and MR1.**

*Action*

**No change to the Plan.**

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**Policy BHE2: Landscape Character**

*Representation(s)*

**3786 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

The wording in criterion b needs to be clear, for example:  
\* protecting Nationally Designated Landscapes, or  
\* protecting National Parks and Areas of Outstanding Natural Beauty (AONB) and their settings.

*Council's Initial Response*

**Agreed. Amend wording of criterion b) to specify National Parks and Areas of Outstanding Natural Beauty (AONB) and their settings.**

*Action*

**Change to the Plan (Focused Changes)**

*Representation(s)*

**3165 Professor John Finney [4854] Support**

*Summary:*

As has been emphasised earlier in the Deposit LDP, landscape character is an important component relating to health and wellbeing, so it is good to see the emphasis on this placed here.

*Council's Initial Response*

**Support welcomed**

*Action*

**No change to the Plan.**

**Paragraph Para 11.454**

*Representation(s)*

**3787 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

This refers to a range of international and national landscape designations. There are no international landscape designations in Carmarthenshire. The detailed text needs to refer to the Brecon Beacons and Pembrokeshire Coast National Parks and Gower AONB, all of which have part of their setting within the County.

*Council's Initial Response*

**Agreed. Clarify international and national landscape designations. Remove international designation and replace national landscapes with Brecon Beacons and Pembrokeshire Coast National Parks and Gower AONB.**

*Action*

**Change to the Plan (Focused Changes)**

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**Paragraph Para 11.456**

*Representation(s)*

**3788 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

Please refer to LANDMAP as the all-Wales landscape resource, produced by NRW (rather than referring to the former Countryside Council for Wales).

---

*Council's Initial Response*

**Agreed. Replace 'Countryside Council for Wales' with 'NRW LANDMAP resource'**

*Action*

**Change to the Plan (Focused Changes)**

=====

**Paragraph Para 11.457**

*Representation(s)*

**3789 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

This requires clarification, we presume you aim to produce a Landscape Character Assessment SPG based on LANDMAP, not an SPG on LANDMAP. We support the production of such as SPG and are happy to offer our input. Our existing guidance on the use of LANDMAP is on our website.

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*Council's Initial Response*

**Agreed. Clarify wording to affirm the intention of producing a Landscape Character Assessment SPG based on LANDMAP.**

*Action*

**Change to the Plan (Focused Changes)**

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**Paragraph Para 11.458**

*Representation(s)*

**3790 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

*Summary:*

This states that the SPG mentioned in paragraph 11.456 will identify and describe distinctive landscape character areas and types. LANDMAP is a starting point for identifying specific Landscape Character Areas in Carmarthenshire. LANDMAP identifies aspect areas and landscape types at an all-Wales level.

We query the lack of reference to Special Landscape Areas in the written statement.

---

*Council's Initial Response*

**Comments noted. Special Landscape Areas (SLAs) are non-statutory designations and as such there is no requirement to designate them within an LDP. The LDP makes specific provision for the consideration of development proposals in relation to their specific landscape and visual characteristics in ensuring the integrity of landscape character is maintained. Reference should be had to Policy BHE2: Landscape Character. Supplementary Planning Guidance will be developed to identify distinctive landscape character areas.**

**This reflects the LDP's approach of embedding an overarching emphasis on placemaking within the Plan as set out under the suite of policies SP11: Placemaking and Sustainable Places. The Plan therefore makes provision for the consideration of matters in regards to design and placemaking as part of the consideration of development proposals, instead of specifically identifying SLAs. It should be noted that the Council will also be producing Supplementary Planning Guidance on Placemaking and Sustainable Places.**

*Action*

**No change to the Plan.**



**Policy Strategic Policy - SP 15: Climate Change**

*Representation(s)*

**3791 Natural Resources Wales (Miss Sharon Luke) [3253] Support**

*Summary:*

We welcome 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. Mitigating and adapting to Climate Change is a central theme in the emerging South West Wales Area Statement.

**3504 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830] Support**

*Summary:*

As intimated previously, we are supportive of the inclusion of SuDS in new development and as such welcome the provisions of criterion b) of this policy.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**





*Representation(s)*

**3293 Pembrokeshire Coast National Park Authority (Ms Martina Dunne) [2326] Support**

*Summary:*

A small number of comments are provided below.

Climate Change

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.

This NPA supports the approach taken to future-proofing communities in light of predicted sea-level rise and the identification of a Coastal Change Management Area, supported by the South Wales Shoreline Management Plan. A similar approach has been taken in Pembrokeshire Coast National Park. It appears in Carmarthen, however that the areas are not defined on a map, but by a verbal description based on Shoreline Management Plan areas of non-active intervention or Managed Realignment. The Shoreline Management Areas are generally linear in nature and so the LDP 2 would benefit from defining the full inland extent of the areas at risk.

*Council's Initial Response*

**Support welcome.**

**In relation to the respondents comments on the delineation of the Coastal Change Management Area as supported by the South Wales Shoreline Management Plan on the proposals map their identification on as part of the Focused Changes will be considered.**

**The Council will continue to work closely with the respondent as part of the preparation and implementation of the Plan.**

*Action*

**Plan to be amended moving forward to identify the Coastal Change Management Area on the proposals map.**



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**Paragraph Para 11.468**

*Representation(s)*

**3793 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Support**

*Summary:*

NRW welcome that the potential impact of flood risk has formed an important consideration in the assessment of the appropriateness of sites for inclusion with the plan. NRW provide an analysis of the housing allocations and welcome that their comments on the candidate housing sites have been taken on board with no allocations located in the relevant current flood zones included. NRW also review the Plan's evidence base - notably the stage 1 SFCA and Stage 1b SFCA . It is noted that NRW have identified some allocations, outside the current flood zones, which will require FCA's to understand if there are any risks during the lifetime of the development and if so if those risks can be managed in line with the requirements of TAN 15. NRW ask that the LPA be mindful that the Lead Local Flood Authority (LLFA) may identify additional sites subject to flood risk from other sources which will also require assessment. NRW have confirmed that this site (and evidence base) analysis can be logged and responded to within the LDP Infrastructure Assessment. In this regard, with reference to flooding - the only objections to Plan allocations are those 2 sites listed under policy SP9 - see reps 3695 and 3697.

---

*Council's Initial Response*

**Support welcomed / Comments noted.**

**The Infrastructure Assessment will be prepared / updated by the Council.**

**Reference should also be made to the Council's response to representation number 3883 as part of the Council's responses to comments received to policy CCH4.**

**With regards representation reference numbers 3695 and 3697, reference should be made to the Council's response to comments received under policy SP9.**

*Action*

**No change to the Plan.**

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## Paragraph Para 11.469

### *Representation(s)*

**3794 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

#### *Summary:*

The wording for this section requires amendment. It currently states, "Proposals affected by flood risk will be required to submit a Flood Consequences Assessment as part of any planning application". We question whether this is correct in that highly vulnerable development should not be entertained in zone C2. If the zone C2 is to be challenged it should occur before submission of a planning application.

The necessary evidential work is noted as including an FCA and/or topographical survey. This needs to be amended to only FCA. The level of detail required in an FCA will be site specific in line with TAN 15 and the results of a topographical survey should still be explained within an FCA.

---

### *Council's Initial Response*

**Agreed.**

**Reference should also be made to the Council's response to representation number 3883 as part of the Council's responses to comments received to policy CCH4.**

### *Action*

**Amend the paragraph to clarify that HVD should not be entertained in zone C2 and also delete the reference to topographical survey (Change to the Plan - focused changes).**

=====

## Paragraph Para 11.472

### *Representation(s)*

**3347 RWE Innogy UK Ltd (Miss Eleri Davies) [471]**

**Object**

#### *Summary:*

The Welsh Government's targets were set in 2017 prior to the Welsh Government's declaration of a climate emergency and its target to reduce emissions by 95% by 2050 and aspiration to be 'net zero' by 2050. The UK Committee on Climate Change (UKCCC) estimates that delivering 'net zero' will require a fourfold increase in renewable energy deployment (<https://www.theccc.org.uk/wp-content/uploads/2019/05/Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf>). In this context, there needs to be a recognition that 'business as usual' is not enough - accelerated action and progress is required. The Revised LDP is an opportunity to put in place a new planning framework that can facilitate this transition.

---

### *Council's Initial Response*

**Whilst the comments are noted, it is the Council's opinion that the policies of the LDP allow for progress to be made in meeting climate targets.**

### *Action*

**No change to the Plan.**

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**Paragraph Para 11.473**

*Representation(s)*

**3166 Professor John Finney [4854]**

**Support**

*Summary:*

I welcome the recognition that existing carbon sinks should be protected and particularly welcome the specific inclusion of peat. The intention would be made stronger if it was also stated that developments which compromise existing carbon sinks will not be considered. For example, tree planting on land which would challenge the integrity of an existing carbon sink could well be carbon-negative. It would help to preserve this integrity if relevant development proposals were obliged to include a carbon budget to ensure the development resulted in a significant reduction in carbon dioxide and methane emissions.

---

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

=====

*Representation(s)*

**3348 RWE Innogy UK Ltd (Miss Eleri Davies) [471]**

**Support**

*Summary:*

As part of the site-specific EIA process, developers will undertake detailed site-specific peat probing to establish the presence, quality and depth of peat on site and will seek to avoid these and/or offer mitigation where avoidance is not possible. Degraded peat should be considered as an 'opportunity' within which wind farm development, where paired with a suitably robust peat and habitat restoration plan, should be supported by the planning process. This would enable the Carmarthenshire to promote peat restoration and renewable energy in tandem.

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*Council's Initial Response*

**Support welcomed and comments noted.**

*Action*

**No change to the Plan.**

=====

**Policy CCH1: Renewable Energy**

*Representation(s)*

**3167 Professor John Finney [4854]**

**Object**

*Summary:*

- 1. Criterion a. is inconsistent with the requirements concerning protection and enhancement of biodiversity and landscape.
- 2. The allowance of large wind farms of 25MW and over in areas adjoining SSAs goes against previous guidance.
- 3. Better guidance is needed on how the balance is to be assessed between the positive aspects of renewable energy generation and the negative consequences that have to be considered.
- 4. Renewable energy scheme proposals should include a carbon budget.
- 5. The 2033 target for wind energy has already been achieved so there is no requirement for further wind developments in the county.

*Council's Initial Response*

- 1. Criterion a. has now been deleted as it repeats the provisions of Policy NE2: Biodiversity.**
- 2. The Policy has been re-worded to reflect the change from SSAs to Pre-Assessed Areas for Wind Development as set out in "Future Wales".**
- 3. Further guidance will be set out in Supplementary Planning Guidance.**
- 4. Disagree, there is no requirement in national guidance for such schemes to be accompanied with a carbon budget.**
- 5. Targets have been revised by the Welsh Government.**

*Action*

**No change to the Plan as a result of the comments, however a number of changed to Policy CCH3 are proposed and are set out in the Schedule of Focused Changes.**

*Representation(s)*

**3283 Mr Graham Craig [4222]**

**Object**

*Summary:*

Regarding CCH1, if I've understood it correctly, the Renewable Energy Assessment indicates no additional wind power to 2033 and just a 50% increase in solar PV. The next decade is absolutely critical to avoiding the most horrific impacts of climate change so a 7% increase in renewable energy (61 to 68) is simply not good enough. Likewise a 3% increase in renewable heat. The LDP should be hugely more ambitious on renewable energy.

*Council's Initial Response*

**Comments noted. The Renewable Energy Assessment looked at opportunities for schemes of greater than 5MW wind development outside the NDF Priority Areas / Pre-Assessed Areas for Wind Development, and concluded that there are no suitable areas. There is a presumption in favour of large scale wind energy development (including repowering) within the Pre-Assessed Areas for Wind Development as set out in the Welsh Government document "Future Wales".**

*Action*

**No change to the Plan.**

**Representation(s)****3349 RWE Innogy UK Ltd (Miss Eleri Davies) [471]****Object****Summary:**

With regards the criteria set out in Policy CCH1:

- a. The "demonstrable harm" test is not sufficiently clear to enable a decision-maker to weigh up impacts in the planning balance - this should be changed to the more standard planning test of "no unacceptable adverse impacts"; (in line with the test used in CCH1 b.).
- b. No comments - reasonable policy test
- c. The "unreasonable risk or nuisance" test is not sufficiently clear to enable a decision-maker to weigh up impacts in the planning balance - this should be changed to the more standard planning test of "no unacceptable adverse impacts on neighbouring amenity". It is not clear why public accessibility is in the same criterion as 'neighbouring amenity' - it should be separated out.
- d. Proposals should only need to be accompanied with "appropriate mitigation measures" where the environmental impact assessment (EIA) process identifies "likely significant effects" that require mitigation - suggest adding "where required" after "appropriate mitigation measures".

1. Energy generating stations above 10MW are defined as Developments of National Significance (DNS) and submitted directly to the Welsh Ministers - the policy test in the Revised LDP should be "supported" rather than "permitted".

2. No comments.

3. Further clarification is required on how the policy test that proposals "must not prejudice the purpose of these areas" will be applied. Paragraph 2.4 of TAN8 'Planning for Renewable Energy' (July 2005), states that not all land within the Strategic Search Areas "may be technically, economically and/or environmentally suitable for major wind power proposals"; this may also be the case for the solar Local Search Areas (LSAs).

e. Policy CCH1 is intended to apply to all renewable and low carbon energy developments that require planning permission, however criterion e. (landscape and visual impacts) only applies to onshore wind.

f. No comments.

g. Policy CCH1 is intended to apply to all renewable and low carbon energy developments that require planning permission, however criterion g. (cumulative impacts) only applies to onshore wind.

\* Other (CCH1): the Revised LDP should afford significant weight to the climate emergency when determining renewable energy applications that deliver sustainable development and contribute to meeting decarbonisation targets.

*Council's Initial Response*

- a. It is proposed to delete Criterion a. as it repeats the provisions of Policy NE2: Biodiversity.
  - b. Noted.
  - c. Disagree. The use of the term "unreasonable risk or nuisance" is used in the current adopted Carmarthenshire LDP and has been successfully implemented. It is also disagreed to the separation of accessibility from this criterion, the criterion is clear as it stands.
  - d. Agree to the insertion of "where required" after "appropriate mitigation measures".
1. The Policy will be reworded to 10MW, rather than 25MW. Disagree with the use of the term "supported" as opposed to "permitted". It is felt that "permitted" is more positive and is in line with the national guidance.
  2. Noted.
  3. The purpose of the wording "must not prejudice the purpose of these areas" is to ensure that large scale renewable energy development is directed to the search areas, however, it is considered that is may be superfluous and it is proposed to remove the wording.
- e. Reword the criterion to make it clear that it applies to all renewable energy schemes.
  - f. Noted
  - g. Noted, it does apply only to wind development in terms of the cumulative impacts turbines,

Other - comments noted, it is considered that the policies are positive and will contribute to delivering sustainable development that contribute to meeting decarbonisation targets.

*Action*

- Criterion d. - insert "where required" after "appropriate mitigation measures".
- Section 1. Change 25MW to 10MW to reflect those schemes that fall under Developments of National Significance.
- Section 3. Remove the words "must not prejudice the purpose of these areas and".
- Criterion e. Reword by inserting "components" in place of "turbines".



*Representation(s)*

3795 Natural Resources Wales (Miss Sharon Luke) [3253] Object

*Summary:*

The policy requires updating and clarification in the light of the draft NDF and Priority Areas for Renewable Energy (PAREs). NDF policy will supersede the references made to Strategic Search Areas in TAN 8 Planning for renewable energy.

*Council's Initial Response*

Agreed. Policy to be updated to reflect the provisions of "Future Wales".

*Action*

Numerous changes to the Policy as detailed in the Schedule of Focused Changes to reflect the National Development Framework / Future Wales.



*Representation(s)*

**3885 Welsh Government (Mr Mark Newey) [13]**

**Object**

*Summary:*

A large proportion of the Authority is within Priority Areas 11 and 13 for solar and wind energy in the draft NDF. The Authority has prepared a Renewable Energy Assessment (REA) in line with the Toolkit Methodology which concludes that there are no suitable wind Local Search Areas (LSAs) and 4 LSA for solar PV farms. The plan will need to be in conformity with the NDF i.e. how it relates to the priority areas. The Authority will need to:

- \* Identify the 4 LSAs for solar in Policy CCH1.
- \* Demonstrate how the REA has been embedded into the Candidate Site process and explain how renewable energy and low carbon opportunities have informed the scale and location of growth.
- \* Include as part of the monitoring framework the contribution of the plan area toward developing and facilitating renewable and low carbon energy.
- \* Include in the policy framework opportunities for local renewable and low carbon energy generation schemes.

*Council's Initial Response*

**The Policy will be updated to reflect the provisions of "Future Wales".**  
**The Local Search Areas will also be identified within the Policy. Further evidential work will be undertaken prior to the examination.**  
**The monitoring and implementation framework will develop in line with the amendments made in the Focused Changes to the plan and will be considered at examination.**  
**In terms of the comment regarding the inclusion of opportunities for local renewable and low carbon energy generation schemes, the following will be included in the supporting text to the policy "Particular support will be given to renewable and low carbon energy projects which are developed by communities, or which will benefit the host community. Such schemes should accord with the provisions of Policy CCH1".**

*Action*

**Numerous changes to the Policy as detailed in the Schedule of Focused Changes to reflect the National Development Framework / Future Wales.**  
**The monitoring framework will change and develop throughout the process.**  
**Insert the following text to a new paragraph at 11.476a: "Particular support will be given to renewable and low carbon energy projects which are developed by communities, or which will benefit the host community. Such schemes should accord with the provisions of Policy CCH1".**





**Paragraph CCH1: Renewable Energy, LSA S4**

*Representation(s)*

**3169 Professor John Finney [4854]**

**Object**

*Summary:*

Knowing this area well, developments here will clearly contradict the requirement to protect and enhance environment and biodiversity, and damage ecological connectivity.

*Council's Initial Response*

**In identifying Local Search Areas, a number of steps were undertaken which included mapping: the solar resource; the environmental & heritage constraints (both statutory and non-statutory designations); local constraints; grid connection; farmland assessment; and landscape assessment. This exercise is designed to ensure that the most appropriate land is designated.**

*Action*

**No change to the Plan.**

**Paragraph Para 11.475**

*Representation(s)*

**3353 RWE Innogy UK Ltd (Miss Eleri Davies) [471]**

**Object**

*Summary:*

By making no provision for onshore wind outside the TAN8 SSAs, the Revised LDP ignores the current 'Climate Emergency' and the Welsh Government's 2050 'net zero' aspirations (and 95% emissions reduction target).

*Council's Initial Response*

**Noted. The Pre-Assessed Areas for Wind Development set out a large swathe of land within the County for wind development.**

*Action*

**No change to the Plan.**

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**Paragraph Para 11.477**

*Representation(s)*

**3350 RWE Innogy UK Ltd (Miss Eleri Davies) [471] Object**

*Summary:*

In summary, the REA is quite simply a negative exercise in ensuring that not a single square metre of Carmarthenshire County Council's administrative boundary (beyond the TAN8 SSAs) is suitable for onshore wind. The Welsh Government's 2050 net zero aspirations will not be met unless local planning authorities plan positively for all forms of renewable and low carbon energy (including onshore wind). The assumptions in the REA are fundamentally flawed and should be challenged by the Inspector.

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*Council's Initial Response*

**The Renewable Energy Assessment has been undertaken in line with the "Planning for Renewable and Low Carbon Energy - A Toolkit for Planners".**

*Action*

**No change to the Plan.**

=====

**Paragraph Para 11.478**

*Representation(s)*

**3351 RWE Innogy UK Ltd (Miss Eleri Davies) [471] Object**

*Summary:*

The assumptions in Tables 9 and 10 flow directly from the Renewable and Low Carbon Energy Assessment: Carmarthenshire County Council (AECOM, June 2019) which relies on out-of-date documents and, therefore, fundamentally flawed assumptions. In the context of the Welsh Government's declaration of a Climate Emergency and an aspiration to be net zero by 2050, these figures need to be challenged by the Inspector.

---

*Council's Initial Response*

**The Renewable Energy Assessment (REA) has been undertaken in line with the "Planning for Renewable and Low Carbon Energy - A Toolkit for Planners". The REA has been refreshed to take account of the National Development Framework.**

*Action*

**No change to the Plan.**

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**Paragraph Para 11.479**

*Representation(s)*

**3798 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

This section requires updating to reflect the draft NDF.

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*Council's Initial Response*

**Agree, this section will be updated. Paragraphs 11.479-11.481 will be deleted as the advice has now been superseded by that set out in "Future Wales".**

*Action*

**Delete Paragraphs 11.479-11.481 and replace these with an explanation of the Pre-Assessed Areas for Wind Development as set out in "Future Wales".**

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**Paragraph Para 11.480**

*Representation(s)*

**3352 RWE Innogy UK Ltd (Miss Eleri Davies) [471] Object**

*Summary:*

There are no criteria iv-vii in policy CCH1 - what do these refer to?

Broadly, and given the timescales for adoption of Carmarthenshire CC's Revised LDP and the Welsh Government's National Development Framework, the plan is not sufficiently flexible to adapt to the imminent change in national policy on renewable energy developments.

---

*Council's Initial Response*

**Paragraphs 11.479-11.481 will be deleted as the advice has now been superseded by that set out in "Future Wales". Future Wales sets out Pre-Assessed Areas for Wind Development within the County.**

*Action*

**Delete Paragraphs 11.479-11.481 and replace these with an explanation of the Pre-Assessed Areas for Wind Development as set out in "Future Wales".**

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*Representation(s)*

**3168 Professor John Finney [4854]**

**Object**

*Summary:*

1. Table 8 shows that the 2033 target for wind energy has already been met. There is therefore no requirement for further developments in Brechfa Forest or elsewhere in the county.
2. I cannot comment w.r. to criteria iv - vii as they do not appear to be set out in the document.

---

*Council's Initial Response*

**Paragraphs 11.479-11.481 will be deleted as the advice has now been superseded by that set out in "Future Wales". Future Wales sets out Pre-Assessed Areas for Wind Development within the County.**

*Action*

**Delete Paragraphs 11.479-11.481 and replace these with an explanation of the Pre-Assessed Areas for Wind Development as set out in "Future Wales".**

---

*Representation(s)*

**3799 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

*Summary:*

This section requires updating to reflect the draft NDF.

---

*Council's Initial Response*

**Agree, this section will be updated. Paragraphs 11.479-11.481 will be deleted as the advice has now been superseded by that set out in "Future Wales".**

*Action*

**Delete Paragraphs 11.479-11.481 and replace these with an explanation of the Pre-Assessed Areas for Wind Development as set out in "Future Wales".**

---

**Paragraph Para 11.481**

*Representation(s)*

**3800 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

*Summary:*

This section requires updating to reflect the draft NDF.

---

*Council's Initial Response*

**Agree, this section will be updated. Paragraphs 11.479-11.481 will be deleted as the advice has now been superseded by that set out in "Future Wales".**

*Action*

**Delete Paragraphs 11.479-11.481 and replace these with an explanation of the Pre-Assessed Areas for Wind Development as set out in "Future Wales".**

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## Paragraph Para 11.483

### *Representation(s)*

**3796 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

#### *Summary:*

Four solar photovoltaic Local Search Areas have been identified within the county. These will still be required to minimise landscape and visual impacts, even if the principle of development is acceptable in these areas.

---

### *Council's Initial Response*

**Agree, add the following sentence to the end of paragraph 11.483: "Developments will be required to minimise landscape and visual impacts".**

### *Action*

**Add the following to the end of paragraph 11.483: "Developments will be required to minimise landscape and visual impacts".**

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## Paragraph Para 11.484

### *Representation(s)*

**3797 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

#### *Summary:*

Proposals outside local search areas are required to be acceptable in landscape and visual terms, however local and national search areas only apply to solar and wind energy developments.

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### *Council's Initial Response*

**Noted. Within the Pre-Assessed Areas for Wind Development identified in "Future Wales" there is a presumption in favour of large-scale on-shore wind energy development and the associated landscape change subject to the criteria in policy 18. In terms of the Local Search Areas, it is proposed to add the following sentence to the section 2 of Policy CCH1: "Developments should not have an unacceptable impact on visual amenity or landscape character."**

### *Action*

**Add the following sentence to the section 2 of Policy CCH1: "Developments should not have an unacceptable impact on visual amenity or landscape character".**

**Policy Policy CCH2 - Electric Vehicle Charging Points**

*Representation(s)*

**3368 Barratt David Wilson Homes (Mrs Francesca Evans) [4879]**

**Object**

*Summary:*

In summary, BDW objects to this policy and questions whether it is realistic and deliverable. There is no evidence provided by the authority to confirm that grid capacity will be available to support this policy and so there is no assurance to BDW that this significant additional cost will be justified. BDW would prefer a more flexible approach to allow developers to provide this technology on a site-by-site basis where there is market demand and grid capacity. BDW request that the wording of the policy is changed from &quot;required&quot; to &quot;encouraged.&quot;

*Council's Initial Response*

**Noted and agreed in part.**

**In seeking to respond to the implications of climate change and the Councils declaration of a climate emergency the Plan has sought promote a positive and progressive approach including through the provision of Electric Vehicle Charging points. Whilst the Council remains committed to this positive approach the implications that grid infrastructure capacity may have on some proposals is recognised. Consequently the supporting text of CCH2 will be amended.**

*Action*

**Change to the Plan.**

**Amend the supporting text of policy CCH2.**



*Representation(s)*

**3172 Professor John Finney [4854]**

**Support**

*Summary:*

Comment: With respect to provision in flatted developments, one fast charging point is totally inadequate. Surely it should be a percentage of the number of flats - and preferably rapid rather than fast.

*Council's Initial Response*

**Agreed in part.**

**Policy CCH2 currently makes provision for at least one fast charging point in flatted development with non-dedicated parking bays. Whilst at this point, and the absence of guidance to the contrary this is considered reasonable it is recognised that as technology and the market percentage of ULEV increases the amount of charging points required will be subject to review. Consequently, SPG will be prepared to supplement the policy and to enable a responsive framework through which such changes can be reflected. The supporting text of the policy will be amended accordingly.**

**In relation to the respondent's comments on the speed of the charging points policy CCH2 and supporting text will be amended to reflect 'fast' as a minimum provision.**

*Action*

**Change to the Plan.**

**Policy CCH2 and its supporting text to be amended accordingly.**

**Paragraph Para 11.495**

*Representation(s)*

**3170 Professor John Finney [4854]**

**Support**

*Summary:*

I strongly support this - lack of charging capability is a major deterrent to the expansion of electric vehicle use and the compulsory provision of a domestic recharging facility will help to reduce the barrier to going electric.

*Council's Initial Response*

**Support Welcomed**

*Action*

**No change to the Plan**

**Policy CCH3: Water Quality and Protection of Water Resources**

*Representation(s)*

**3505 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830] Support**

*Summary:*

As intimated in the supporting text to this policy at paragraph 11.505 there are several locations within the County where we abstract water that is then treated before being released to the public water supply network. As such, we fully support the provisions of this policy in preventing the degradation of water resources.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

**Paragraph Para 11.502**

*Representation(s)*

**3802 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

Two of the key principles of the Water Framework Directive are to protect and restore the water environment. We acknowledge the examples given but the restoring aspect also requires consideration. For example encouraging the use of green engineering to restore the natural state and functioning of the river system by removing culverts can help to support biodiversity, recreation, flood management and landscape development. Any new development should explore opportunities for increasing water quality in their catchment which will help towards achieving/ retaining good WFD Status.

*Council's Initial Response*

**Agreed. Include 'restoring' aspect to reflect the principles of the Water Framework Directive.**

*Action*

**Change to the Plan (Focused Changes)**



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*Representation(s)*

**3803 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

*Summary:*

Please include reference to the following authorisations which may be required in addition to planning permission for certain activities near watercourses: 1 Flood Risk Activity Permits (FRAP) from NRW on main rivers. 2 Flood Defence Consents from the LLFA on ordinary watercourses.

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*Council's Initial Response*

**Agree in part. Include reference to additional watercourse consent in supporting text 11.506 not 11.502**

*Action*

**Change to the Plan (Focused Changes)**

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*Representation(s)*

**3506 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]**

**Support**

*Summary:*

Sewerage systems play a role in ensuring water quality is improved. Accordingly, DCWW are committed to ensuring their WwTW discharges are compliant in meeting the permit conditions set out by NRW and will continue to invest in undertaking 'quality' schemes such as phosphorous removal where necessary."

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*Council's Initial Response*

**Comments noted.**

*Action*

**No change to the Plan.**

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**Paragraph Para 11.504**

*Representation(s)*

**3507 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]**

**Support**

*Summary:*

We welcome the inclusion of the detail within paragraphs 11.504 with regard to the availability of water resources for development growth throughout the plan period

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*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

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**Paragraph Para 11.505**

*Representation(s)*

**3804 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

We refer you to the Carmarthen Bay Abstraction Licensing Strategy which sets out how water resources are managed in the Carmarthen Bay Catchment Abstraction Management Strategy (CAMS) area. It provides information about where water is available for further abstraction and an indication of how reliable a new abstraction licence may be. This strategy was produced in May 2014 and can be found on our website

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*Council's Initial Response*

**Agreed. Include reference to Carmarthen Bay Abstraction Licencing Strategy (2014)**

*Action*

**Change to the Plan (Focused Changes)**



*Representation(s)*

**3508 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830] Support**

*Summary:*

As intimated in the supporting text to this policy at paragraph 11.505 there are several locations within the County where we abstract water that is then treated before being released to the public water supply network. As such, we fully support the provisions of this policy in preventing the degradation of water resources

---

**3509 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830] Support**

*Summary:*

Concur with the sentiment of paragraph 11.505 in this being a matter that we do indeed continually monitor (this paragraph refers to matters relating to abstraction and water supply)

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*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**



**Policy CCH4: Flood Risk Management and Avoidance**

*Representation(s)*

**3883 Welsh Government (Mr Mark Newey) [13]**

**Object**

*Summary:*

Category B - Policy CCH4 Flood Risk Management and Avoidance

The Authority has undertaken a high level Stage 1 Strategic Flood Consequences Assessment (SFCA) with information on the level and nature of flood risk on Candidate Sites and existing allocations in the extant LDP. The Council's Stage 1b SFCA builds on these findings and looks in detail at selected Candidate Sites, extant allocations and proposed Gypsy and Traveller sites in Llanelli, Burry Port and the surrounding areas. From the Stage 1b SFCA it is unclear which allocated sites listed in Policies HOM1 and SP9 are subject to flood risk as the site numbering in the SFCA does not align with either policy. PPW is clear that development should be avoided in areas of flooding (paragraph 6.6.22). As worded, Policy CCH4 permits all development subject to meeting the justification tests in TAN 15. It should be clear that no highly vulnerable development will be permitted in Zone C2.

*Council's Initial Response*

**Agreed in regards the comments made on Highly Vulnerable Development.**

**In regards to Highly Vulnerable Development (HVD), reference is made to paragraph 11.514 of the Plan where it is stated that "Only less vulnerable development will be permitted within Zone C2."**

**Notwithstanding this (and for clarity), the Council accepts that it is prudent to explicitly state within the wording of the policy that this is the case.**

**To avoid repetition as a result of the above change, the Council will also make a consequential amendment to the Plan by deleting sentence 2 of paragraph 11.514.**

**Reference should also be made to the Council's response to representations 3793 (see responses to comments made to paragraph 11.468) and 3794 (see responses to comments made to paragraph 11.469).**

**In regards to the Stage 1b SFCA, the Council will produce an explanatory note to accompany the document to assist in cross referencing the sites within it to the allocated sites in the Plan itself.**

*Action*

**Confirm that no highly vulnerable development is permitted in Zone C2 within the policy wording of policy CCH4. Consequential amendment - deletion of sentence 2 of paragraph 11.514. (Change(s) to the Plan - focused change(s)).**

**Publish SFCA stage 1b explanatory note for completion in time for submission of the Plan (no change to the Plan).**



**Policy CCH5: Renewable and Low Carbon Energy in New Developments**

*Representation(s)*

**3369 Barratt David Wilson Homes (Mrs Francesca Evans) [4879]**

**Object**

*Summary:*

BDW Homes objects to the proposed policy requirement to submit an Energy Assessment for residential development proposals of 100 or more homes, which assesses the potential to incorporate and use low carbon technology, or to use existing sources of renewable energy or district heating networks.

BDW consider a more appropriate and reasonable threshold should be 200 or more homes as it is not viable to incorporate renewable energy/ low carbon schemes on sites that are below this threshold. BDW consider that the policy threshold should be amended accordingly.

*Council's Initial Response*

**Disagree. 100 houses or more is considered to be a suitable threshold within the Carmarthenshire area due as there are a small number of sites that exceed 100 houses.**

*Action*

**No change to the Plan.**

**Policy CCH6: Climate Change - Forest, Woodland and Tree Planting**

*Representation(s)*

**3805 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

*Summary:*

This policy needs to be caveated. Proposals must be appropriate to the landscape and ecological character of the locality as indicated by the content of paragraph 11.522. Commercial conifer plantations will not achieve many of the stated aims.

*Council's Initial Response*

**Agreed. Stipulate that proposals must be appropriate to the landscape and ecology character of the locality.**

*Action*

**Change to the Plan (Focused Changes)**

*Representation(s)*

**3722 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Support**

*Summary:*

We support this policy and the recognition given to the importance of the contribution trees, forest and woodland provide to our ecosystems.

*Council's Initial Response*

**Support Welcomed**

*Action*

**No change to the Plan**

*Representation(s)*

**3723 Natural Resources Wales (Miss Sharon Luke) [3253] Support**

*Summary:*

It is however, equally important that tree planting occurs on appropriate sites. Carmarthenshire is recognised for the importance of its marshy grassland habitat. This is not always considered in proposals and should be highlighted upfront. Marshy grassland is important for biodiversity and connectivity. In Carmarthenshire this provides important potential habitat for the protected Marsh Fritillary butterfly which has a stronghold and a nationally important population in the county.

*Council's Initial Response*

**Support welcomed and comments noted**

*Action*

**No change to the Plan**

*Representation(s)*

**3171 Professor John Finney [4854] Support**

*Summary:*

It should be recognised that tree planting of itself does not necessarily result in an overall carbon sink: it will depend on the nature of the site on which the planting is done. To ensure the overall effect on greenhouse gas emissions/carbon absorption is positive, proposals should be accompanied by a carbon budget to demonstrate the overall carbon sequestration consequences are positive.

*Council's Initial Response*

**Support welcomed and comments noted. The Carmarthenshire County Council document 'Route towards becoming a Net Zero Carbon Local Authority by 2020' sets out measures taken by the Authority to measure carbon emissions and to explore the feasibility of tree-planting, and other such measures, on Council controlled land to contribute towards carbon offsetting**

*Action*

**No change to the Plan**

**Policy Strategic Policy - SP16: Sustainable Distribution - Settlement Framework**

*Representation(s)*

**3416 Mrs J Berrow [582]**

**Object**

*Summary:*

Concerns regarding the proposed development on Old School Rd Llansteffan:

1. The current road is not able to support the traffic;
2. Water from fields from the top of old school rd to the centre of the village is an issue;
3. Would it not be sensible to see the effect of the Maes Griffiths development before agreeing to further development?
4. Affordable housing. The current status of holiday and second properties within the village should be considered.
5. Perhaps postponement of any potential development should be considered in light of the current situation regarding Covid 19.

**3414 M Evans [4975]**

**Object**

*Summary:*

I would like to put my concerns to the development plans that have been put forward for Old School Road Llansteffan:

The road its self is a single road use age. Which is all ready having large volume daily use.

Would it not be better to see how the village gets on with Meas Griffiths development first?

If we are not careful Llansteffan could lose its appealing ness, and became smothered in houses.

The infrastructure needs to be looked at. The Extra volume of vehicles could increase our air pollution.

Please don't lose sight of the aesthetics of this village.

*Council's Initial Response*

**The development limits have been re-drawn to potentially allow small scale development to take place along Old School Road. Any potential new proposal will be considered against the policies set out within the revised LDP. This includes highway, infrastructure and amenity considerations and will form part of a planning application process should a development be taken forward to application stage.**

**Concerns relating to development in Llansteffan are noted, with the LDP seeking to balance future growth against environmental, social and economic constraints.**

*Action*

**No change to the Plan**

*Representation(s)*

**3117 BA George [4839]**

**Object**

*Summary:*

Objection to Policy SP16 as Cynheidre is classed as a rural village (No development limits) in the deposit LDP. Refer to representation 3116 (policy sd1).

*Council's Initial Response*

**The approach as set out within policy SP16 Strategic Policy - SP16: Sustainable Distribution - Settlement Framework is considered sound. The diversity of the County is recognised with regard given to housing in rural areas, and the value such areas play within the County.**

**Within rural villages (Tier 4 - such as Cynheidre) and non-defined settlements, new housing development will be limited to small scale opportunities.**

**With specific regard to Cynheidre (a Tier 4 settlement), reference is made to Policy HOM3 of this Plan where opportunities may exist for proponents of appropriate residential proposals.**

**Refer also to the Council's response to representation reference number 3116 under the Council's responses to representations received under policy SD1.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4544 Mr G Jones [5287]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to Policy SP16 as Cynheidre is classed as a rural village (No development limits) in the deposit LDP.

Reference is made to representation 4543 (policy hom1) where a site is promoted for housing.

*Council's Initial Response*

**The approach as set out within policy SP16 Strategic Policy - SP16: Sustainable Distribution - Settlement Framework is considered sound. The diversity of the County is recognised with regard given to housing in rural areas, and the value such areas play within the County.**

**Within rural villages (Tier 4 - such as Cynheidre) and non-defined settlements, new housing development will be limited to small scale opportunities.**

**With specific regard to Cynheidre (a Tier 4 settlement), reference is made to Policy HOM3 of this Plan where opportunities may exist for proponents of appropriate residential proposals.**

**Refer also to the Council's response to representation reference number 4543 under the Council's responses to representations received under policy SD1.**

*Action*

**No change to the Plan.**





*Representation(s)*

**4453 Mr Eirian Williams [877]**

**Object**

*Summary:*

Objection to Policy SP16 as Cynheidre is classed as a rural village (No development limits) in the deposit LDP. Reference is made to representation 4452 under policy sd1.

*Council's Initial Response*

**The approach as set out within policy SP16 Strategic Policy - SP16: Sustainable Distribution - Settlement Framework is considered sound. The diversity of the County is recognised with regard given to housing in rural areas, and the value such areas play within the County.**

**Within rural villages (Tier 4 - such as Cynheidre) and non-defined settlements, new housing development will be limited to small scale opportunities.**

**With specific regard to Cynheidre (a Tier 4 settlement), reference is made to Policy HOM3 of this Plan where opportunities may exist for proponents of appropriate residential proposals.**

**Refer also to the Council's response to representation reference number 4452 under the Council's responses to representations received under policy SD1.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4377 Mr R Robinson [4092]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

We seek amendments to Policy SP16 in order to facilitate the inclusion of candidate site SR/020/002. The inclusion of this site within the development limits for Capel Seion would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table.**

**Capel Seion has been defined as a Tier 4 settlement, and therefore the village does not have development limits. Any proposal will be considered against the policies set out within Policy HOM3 of the revised LDP.**

*Action*

**No change to the Plan**

*Representation(s)*

**4485 Cllr Tina Higgins [2920]**

**Object**

*Summary:*

Agricultural land. The land in the ward currently used for agriculture should remain as it is. This enhances the rural feel of the ward and provides employment to local residents.

*Council's Initial Response*

**Noted. The allocation of sites has been undertaken in accordance with the Site Assessment Methodology. In this respect the methodology specifically seeks to protect Agricultural land of grades 1, 2 and 3a of the Agricultural Land Classification system is the best and most versatile.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4539 Mr W M Jones [4010]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Four Roads has been incorrectly categorised as a 'Tier 4 Rural Village'.

Four Roads has a bus service, linking the village with nearby settlements, providing convenient access to a wide range of services and facilities, as well as further bus and rail services to Llanelli and Swansea.

The sustainable development credentials of Four Roads should therefore be given full recognition and consideration when determining potential future growth options.

Four Roads comprises a strong and vibrant, Welsh speaking community, which should not be demoted to a restricted growth scenario. Its classification as a Tier 4 settlement, with no development limits, will result in a lack of opportunity in respect of housing provision for the local community.

This classification is more perplexing when compared with certain other settlements that have been categorised as Tier 3, which have a comparable or lower sustainable development status than Four Roads, in terms of accessibility to community facilities and local services.

*Council's Initial Response*

**The approach as set out within policy SP16 Strategic Policy - SP16: Sustainable Distribution - Settlement Framework is considered sound. The diversity of the County is recognised with regard given to housing in rural areas, and the value such areas play within the County. Within rural villages (Tier 4) and non-defined settlements (such as Four Roads), new housing development will be limited to small scale opportunities.**

**Reference is made to Policy HOM3 of this Plan where opportunities may exist for proponents of appropriate residential proposals in such areas.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3081 Mr Page [4808]**

**Object**

*Summary:*

Llangadog is within a flood plain and roads can not take increase of traffic. It is also in a conservation area. There are no jobs in the village.

**3082 Mr & Mrs Morse [4791]**

**Object**

*Summary:*

Llangadog is within a flood plain and roads can not take increase of traffic. It is also in a conservation area. There are no jobs in the village.

*Council's Initial Response*

**Disagree.**

**The Plan has full regard to the implications arising from flood risk. It should be noted that not all of the settlement is impacted upon by flood risk.**

**The Plan is supported by evidence in relation to infrastructure. In addition, the allocation of any sites for development has been undertaken in accordance with the site assessment methodology which has regards to highways implications. The status of the settlement as a conservation area is recognised and any developments impacting upon that part of Llangadog will be considered accordingly. It is also noted that the settlement has an established employment base.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3086 Mr & Mrs Morse [4791]**

**Object**

*Summary:*

Llandovery is in the National Park and also floods in places.

**3085 Mr Page [4808]**

**Object**

*Summary:*

Llandovery is in the National Park and also floods in places.

*Council's Initial Response*

**Disagree.**

**The Plan has full regard to the implications arising from flood risk. The settlement is not in the Brecon Beacons National Park.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3322 Mr Chris Lloyd [4928]**

**Object**

**Agent: M&M Design Consultancy (Mr Mike Morgan) [5022]**

*Summary:*

Strategic Policy 16 identifies the settlement hierarchy in the County. Currently Heol Ddu is named as a Tier 4 - Rural Village. We feel that the village should be a Tier 3 - Sustainable Village and not a Tier 4 village. This is therefore an objection to Policy sp16 - reference is also made to 3323 where a site allocation for housing is sought.

**3468 Ms L Rooke [846]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to SP16 - no development limits around Heol Ddu. Development limits should be drawn around the settlement of Heol Ddu (and a specific site is requested to be included within the limits).

The inclusion of this site within the development limits for Heol Ddu would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The approach as set out within policy SP16 Strategic Policy - SP16: Sustainable Distribution - Settlement Framework is considered sound. The diversity of the County is recognised with regard given to housing in rural areas, and the value such areas play within the County. Within rural villages (Tier 4) and non-defined settlements (such as Heol Ddu), new housing development will be limited to small scale opportunities.**

**Reference is made to Policy HOM3 of this Plan where opportunities may exist for proponents of appropriate residential proposals in such areas.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4412 Maralyn Treharne [3888]**

**Object**

*Summary:*

Objection to Broad Oak being categorised as a Tier 4 settlement (with no development limits) under Policy SP16:

I consider the removal of Development Limits from the revised plan to be unsound and lacking in good judgement. The existence of Development Limits hitherto have served as a base line of constraint to inhibit inappropriate rural development.

It can be anticipated that removal of Development Limits will inevitably lead to the sale of prime agricultural land for development, to the detriment and well being of those living in the smallest of rural communities.

How it should be changed to make it sound:

Either the retention of Development Limits in Tier 4 Settlements, or the reclassification of the settlement of Broad Oak out of the Tier 4 deregulation.

*Council's Initial Response*

**The approach as set out within policy SP16 Strategic Policy - SP16: Sustainable Distribution - Settlement Framework is considered sound. The diversity of the County is recognised with regard given to housing in rural areas, and the value such areas play within the County. Within rural villages (Tier 4) and non-defined settlements (such as Broad Oak), new housing development will be limited to small scale opportunities.**

**Reference is made to Policy HOM3 of this Plan where opportunities may exist for proponents of appropriate residential proposals in such areas.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4537 Ms L Rooke [846]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Having considered the settlement framework's proposed tiers, it is felt that Heol Ddu has been incorrectly categorised as a 'Tier 4 Rural Village'.

Heol Ddu is situated within a convenient distance of the main goods and services centre of Ammanford (approx. 1.39 kilometres). Ammanford provides convenient access to bus services to Swansea, Llanelli and Carmarthen, as well as the Heart of Wales rail service.

The sustainable development credentials of Heol Ddu should therefore be given full recognition and consideration when determining potential future growth options. The settlement should not be demoted to a restricted growth scenario. Its classification as a Tier 4 settlement, with no development limits, will result in a lack of opportunity in respect of housing provision for the local community.

This classification is more perplexing when compared with certain other settlements that have been categorised as Tier 3, which have a comparable or lower sustainable development status than Heol Ddu, in terms of accessibility to community facilities and local services.

*Council's Initial Response*

**The approach as set out within policy SP16 Strategic Policy - SP16: Sustainable Distribution - Settlement Framework is considered sound. The diversity of the County is recognised with regard given to housing in rural areas, and the value such areas play within the County. Within rural villages (Tier 4) and non-defined settlements (such as Heol Ddu), new housing development will be limited to small scale opportunities.**

**Reference is made to Policy HOM3 of this Plan where opportunities may exist for proponents of appropriate residential proposals in such areas.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4553 Mr R Robinson [4092]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

It is felt that Capel Seion has been incorrectly categorised as a 'Tier 4 Rural Village'. Capel Seion has regular bus services linking the village with nearby settlements, as well as further bus and rail services at Carmarthen, Llanelli and Swansea. The village is situated within a convenient distance of the main goods and services centre of Cross Hands and access to the main A48 route to and from West Wales.

The sustainable development credentials of Capel Seion should therefore be given full recognition and consideration when determining potential future growth options.

Furthermore, Capel Seion comprises a strong and vibrant, Welsh speaking community, which should not be demoted to a restricted growth scenario. Its classification as a Tier 4 settlement, with no development limits, will result in a lack of opportunity in respect of housing provision for the local community.

This classification is more perplexing when compared with certain other settlements that have been categorised as Tier 3, which have a comparable or lower sustainable development status than Capel Seion, in terms of accessibility to community facilities and local services.

*Council's Initial Response*

**The approach as set out within policy SP16 Strategic Policy - SP16: Sustainable Distribution - Settlement Framework is considered sound. The diversity of the County is recognised with regard given to housing in rural areas, and the value such areas play within the County. Within rural villages (Tier 4) and non-defined settlements (such as Capel Seion), new housing development will be limited to small scale opportunities.**

**Reference is made to Policy HOM3 of this Plan where opportunities may exist for proponents of appropriate residential proposals in such areas.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4486 Cllr Tina Higgins [2920]**

**Object**

*Summary:*

There is already planning permission for approximately 250 residential dwellings within the ward. This is more than adequate for current and future needs. Any further provision to this number could mean empty properties

*Council's Initial Response*

**Noted.**

**The identified housing growth within the ward incorporates allocated and committed sites. Permissions will where appropriate be included as part of the Plan within these figures. The strategy of the LDP seeks to support the distribution of growth which is of a scale and nature appropriate to the hierarchy and that settlement. In this respect the LDP seeks to ensure that development is appropriate to the settlement and reflective of its ability to accommodate growth and the services and facilities available.**

**It should be noted that the inclusion of sites within the LDP for residential purposes has been subject to full consideration through the site assessment methodology.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4022 Mr E Hughes [5126]**

**Object**

**Agent: Roger Parry & Partners LLP (Richard Corbett) [2925]**

*Summary:*

Objection to policy SP16 sustainable distribution in that the settlement where a housing allocation is proposed (see 4024) does not have development limits. As a sustainable village, Cwmifor can accommodate more development, and play a greater part in helping meet Camarthenshire's development requirements. The ward had 143 households at the time of the 2011 census, and applying the 1% per annum average growth rate would suggest a need for 12 new dwellings over the plan period

*Council's Initial Response*

**The approach as set out within policy SP16 Strategic Policy - SP16: Sustainable Distribution - Settlement Framework is considered sound. Whilst settlements such as Ashfield Row have no defined development limits, the diversity of the County is recognised with regard given to housing in rural areas, and the value such areas play within the County. Within rural villages (Tier 4) such as Ashfield Row, and non-defined settlements, new housing development will be limited to small scale opportunities. Reference is made to Policy HOM3 of this Plan where opportunities may exist for proponents of appropriate residential proposals in such areas.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3860 David Hefin Lewis [2772]**

**Object**

*Summary:*

The Welsh Government states all communities should have development limits set. My land does not flood. Both LDP Inspectors advised it was suitable for affordable housing.

*Council's Initial Response*

**The approach as set out within policy SP16 Strategic Policy - SP16: Sustainable Distribution - Settlement Framework is considered sound. The diversity of the County is recognised with regard given to housing in rural areas, and the value such areas play within the County. Within rural villages (Tier 4), and non-defined settlements, new housing development will be limited to small scale opportunities. Reference is made to Policy HOM3 of this Plan where opportunities may exist for proponents of appropriate residential proposals in such areas.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3829 Mr M Baggott [5071]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Submit that Cwmdwyfran should not therefore be afforded defined development limits within the Deposit LDP and accordingly be named as a Tier 4 "Rural Village". We consider therefore that the settlement should be included within the settlements listed under Tier 4, under the provision of Policy SP16 of the Carmarthenshire Local Development Plan.

*Council's Initial Response*

**The identification of Cwmdwyfran reflects its position on a key transport route and its relationship to Bronwydd.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3939 Pegasus Group (Daniel Millward) [5095]**

**Object**

*Summary:*

Objection to Policy SP16.

Whilst we note that the highest proportion of development is due to be delivered at the Tier 1 settlements (a principle we support), we consider that too great a proportion of growth has been allocated to lower order settlements.

The Plan is unrealistic in the way it proposes to distribute growth to deliver its economic aspirations and the allocation of housing sites to support this is also unsuitable as a result.

The Plan needs to re-think its distribution framework and allocate higher levels of development to the Tier 1 settlements.

*Council's Initial Response*

**Disagree.**

**The Revised LDP and its strategy seeks to support the distribution of growth which is of a scale and nature appropriate to the hierarchy and its settlement.**

**It should be noted that the LDP is prepared within the context of other plans and strategies including those of the authority, whereby the need to reflect and support rural communities is recognised. Consequently, the Plan provides a balanced approach which recognises and has full regard to national policy provisions in relation to the sustainable location of development, whilst also acknowledging and reflecting the needs of rural communities.**

*Action*

**No change to the Plan**



*Representation(s)*

**4458 Mr Thomas Marr [5235]**

**Object**

*Summary:*

Objection to the exclusion of a site from the development limits of Brynamman under Policy SP16.

There are existing residential developments that fall outside of the boundary of the LDP therefore the proposed site allocation would have little visual impact on the surrounding area. The new site allocation falls within the inner boundary of the village of Brynamman. There is existing outline planning permission for development (SeC9/h1) which is set back off Mountain Road an equal distance (behind existing houses) to the proposed site allocation.

*Council's Initial Response*

**The approach as set out within policy SP16 Strategic Policy - SP16: Sustainable Distribution - Settlement Framework is considered sound. Brynamman is identified as a Tier 2 settlement and it is has been afforded with sufficient residential opportunities within the defined development limits.**

**The objection site is separated and detached from the current built form. It's inclusion would constitute an illogical extension of the development limits.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4489 A New [5211]**

**Object**

*Summary:*

Objection to the exclusion of development limits around the settlement of Cynghordy (and in particular the site covered by planning application E/39932). The site covered by planning application E/39932 forms part of housing allocation SC28/h1 in the current LDP. We were seeking to secure planning on part of that site for a single storey dwelling and had hoped to do so before the expiry of the current Plan in 2021. However, in the context of the current pandemic, this will now not happen. We therefore request that it be included in the Revised LDP.

*Council's Initial Response*

**The approach as set out within policy SP16 Strategic Policy - SP16: Sustainable Distribution - Settlement Framework is considered sound. Whilst settlements such as Cynghordy have no defined development limits, the diversity of the County is recognised with regard given to housing in rural areas, and the value such areas play within the County. Within rural villages (Tier 4) such as Cynghordy, and non-defined settlements, new housing development will be limited to small scale opportunities. Reference is made to Policy HOM3 of this Plan where opportunities may exist for proponents of appropriate residential proposals in such areas.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4542 Mrs A Davies [5286]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

The inclusion of this site within new development limits for this part of Capel Dewi would reflect similar such 'outliers' elsewhere in Carmarthenshire.

The site's inclusion would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type.

It's development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

In addition, residential development at this location:-

- would not be detrimental to the amenity of adjacent properties;
- would satisfy recognised housing and sustainability objectives;
- would not have a detrimental impact on the landscape or nature conservation interests.

Furthermore, the site is not impeded by any access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints and its delivery, if allocated, is assured.

*Council's Initial Response*

**The approach as set out within policy SP16 Strategic Policy - SP16: Sustainable Distribution - Settlement Framework is considered sound. Capel is identified as a Tier 3 settlement and it is has been afforded with sufficient residential opportunities within the defined development limits.**

**The objection site lies adjacent to a cluster of dwellings that is considered to be an outlier to Capel Dewi, spatially detached from the main built form of the settlement. The site's inclusion within development limits would lead to an unnecessary encroachment into the countryside**

*Action*

**No change to the Plan.**



*Representation(s)*

**4533 Mr D Williams [3994]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

it is felt that Mynyddcerrig has been incorrectly categorised as a 'Tier 4 Rural Village'.

Mynyddcerrig has regular bus services linking the village with nearby settlements, as well as further bus and rail services at Carmarthen, Llanelli and Swansea. The village is situated within a convenient distance of the main goods and services centre of Cross Hands and access to the main A48 route to and from West Wales.

The sustainable development credentials of Mynyddcerrig should therefore be given full recognition and consideration when determining potential future growth options.

Furthermore, Mynyddcerrig comprises a strong and vibrant, Welsh speaking community, which should not be demoted to a restricted growth scenario. Its classification as a Tier 4 settlement, with no development limits, will result in a lack of opportunity in respect of housing provision for the local community.

This classification is more perplexing when compared with certain other settlements that have been categorised as Tier 3, which have a comparable or lower sustainable development status than Mynyddcerrig, in terms of accessibility to community facilities and local services.

*Council's Initial Response*

**The approach as set out within policy SP16 Strategic Policy - SP16: Sustainable Distribution - Settlement Framework is considered sound. The diversity of the County is recognised with regard given to housing in rural areas, and the value such areas play within the County. Within rural villages (Tier 4) and non-defined settlements, new housing development will be limited to small scale opportunities. With specific regard to Mynyddcerrig, reference is made to Policy HOM3 of this Plan where opportunities may exist for proponents of appropriate residential proposals.**

**Refer also to the Council's response to representation reference number 4334 under the Council's responses to representations received under policy SD1.**

*Action*

**No change to the Plan**



*Representation(s)*

4531 Mr P Flinders [3993]

Object

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Having considered the settlement framework's proposed tiers, it is felt that Milo has been incorrectly categorised as a 'Tier 4 Rural Village'.

Milo has regular bus services, linking the village with nearby Llandeilo, Llandybie and Ammanford, providing convenient access to a wide range of services and facilities, as well as further bus and rail services to Llanelli and Swansea.

The sustainable development credentials of Milo should therefore be given full recognition and consideration when determining potential future growth options.

Furthermore, Milo comprises a strong Welsh speaking community, which should not be demoted to a restricted growth scenario. Its classification as a Tier 4 settlement, with no development limits, will result in a lack of opportunity in respect of housing provision for the local community.

This classification is more perplexing when compared with certain other settlements that have been categorised as Tier 3, which have a comparable or lower sustainable development status than Milo, in terms of accessibility to community facilities and local services.

*Council's Initial Response*

**The approach as set out within policy SP16 Strategic Policy - SP16: Sustainable Distribution - Settlement Framework is considered sound. The diversity of the County is recognised with regard given to housing in rural areas, and the value such areas play within the County. Within rural villages (Tier 4) and non-defined settlements, new housing development will be limited to small scale opportunities. With specific regard to Milo, reference is made to Policy HOM3 of this Plan where opportunities may exist for proponents of appropriate residential proposals.**

**Refer also to the Council's response to representation reference number 4332 under the Council's responses to representations received under policy SD1.**

*Action*

**No change to the Plan.**



**Representation(s)****3176 Llangennech Community Council (Mr EW Evans,) [60]****Object****Summary:**

Llangennech Community Council considered the LDP at its meeting held on 10 February 2020. Its view is that Llangennech has been over developed in the past with no proper consideration of infrastructural issues.

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*Council's Initial Response*

**Comments noted.**

**A notable consideration in the distribution of development is the importance of the Plan reflecting its evidence base in regards the Role and Function of its settlements. Reference should be made to the Role and Function Topic Paper (January 2020) which is a key piece of evidence in this regard.**

**The Plan reflects the role and function of settlements and seeks to be responsive in how it assigns growth, to urban and rural areas of the County. The Plan seeks to distribute growth and development spatially across the County, with settlements allocated to one of 6 clusters within the hierarchy. The cluster based approach is flexible in apportioning new growth and avoids any assumption that every settlement in every tier must contribute towards growth. Llangennech is located within Cluster 2 (tier 2).**

**Paragraph 6.42 of the Role and Function Topic Paper (January 2020) outlines that this cluster along the Llanelli coastline retains a strong developmental focus, with its regeneration potential recognised within the Transformations Strategy and the Swansea Bay City Deal. Paragraph 6.92 of the Topic Paper outlines that Llangennech is a self-sufficient village with all the services and facilities appropriate for its scale being within close proximity. In this sense, it plays a vital service centre role within the settlement hierarchy. Its position on the M4 corridor is also recognised.**

**The Council considers that the level of growth earmarked for Llangennech in the Plan is appropriate and deliverable given its supportive role for Llanelli within the wider cluster 2.**

**In noting the concerns raised within this representation, the Council has acknowledged the importance of avoiding coalescence with the Bryn area as part of its approach to development site selection. It has also ensured that the Plan is based upon a robust evidence base.**

**Due regard is also given to the evidence base of the Plan - notably the Transport Background Paper (January 2020), Infrastructure Assessment Topic Paper (January 2020) and the Role and Function Topic Paper (January 2020). Such evidence can be updated moving forward.**

**Reference can also be made to a series of policies within the Plan that can provide mitigatory roles at application level - eg INF1 - Planning Obligations. The Council recognises that Focused Changes are proposed in Llangennech- notably to sites Sec7/h4 and Sec7/h5, but it is considered that the role and function of the settlement is unaffected.**

*Action*

**No change to the Plan.**





**Representation(s)****3355 mr. William griffiths [4896]****Object****Summary:**

Llangennech / Bryn been overdeveloped and great danger they will become submerged in the wider Llanelli conurbation, virtually no remaining green belt with Llanelli. No corresponding improvements to local infrastructure/roads, services and commercial / shopping outlets - everyone continues to rely on cars to reach facilities - environmentally detrimental. Further housing will make problems worse - pressure on roads and infrastructure, education, medical and social services. Traffic from Bryn development go through Llangennech village - amenity and safety concerns cited. Appreciate some investment steps have taken place over the years (Mwrwg Road River Diversion, river culverts at the Bridge Inn and investment in new sewerage capacity at lower Station Road cited) - however environmental change is moving at a faster pace than investment in new infrastructure and building further houses will lead to greater problems. Suggestion made to enhance the road from Bryn through Penprys and to the Llanelli link road at the crematorium roundabout which would take most of the M4-Llanelli away from the villages.

Reference is also made to representation 3356 under policy HOM1 - Housing allocations which is an objection to the allocation of site sec7/h4.

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*Council's Initial Response*

**Comments noted.**

**A notable consideration in the distribution of development is the importance of the Plan reflecting its evidence base in regards the Role and Function of its settlements. Reference should be made to the Role and Function Topic Paper (January 2020) which is a key piece of evidence in this regard.**

**The Plan reflects the role and function of settlements and seeks to be responsive in how it assigns growth, to urban and rural areas of the County. The Plan seeks to distribute growth and development spatially across the County, with settlements allocated to one of 6 clusters within the hierarchy. The cluster based approach is flexible in apportioning new growth and avoids any assumption that every settlement in every tier must contribute towards growth. Llangennech is located within Cluster 2 (tier 2).**

**Paragraph 6.42 of the Role and Function Topic Paper (January 2020) outlines that this cluster along the Llanelli coastline retains a strong developmental focus, with its regeneration potential recognised within the Transformations Strategy and the Swansea Bay City Deal. Paragraph 6.92 of the Topic Paper outlines that Llangennech is a self-sufficient village with all the services and facilities appropriate for its scale being within close proximity. In this sense, it plays a vital service centre role within the settlement hierarchy. Its position on the M4 corridor is also recognised.**

**The Council considers that the level of growth earmarked for Llangennech in the Plan is appropriate and deliverable given its supportive role for Llanelli within the wider cluster 2.**

**In noting the concerns raised within this representation, the Council has acknowledged the importance of avoiding coalescence with the Bryn area as part of its approach to development site selection. It has also ensured that the Plan is based upon a robust evidence base.**

**Due regard is also given to the evidence base of the Plan - notably the Transport Background Paper (January 2020), Infrastructure Assessment Topic Paper (January 2020) and the Role and Function Topic Paper (January 2020). Such evidence can be updated moving forward.**

**Reference can also be made to a series of policies within the Plan that can provide mitigatory roles at application level - eg INF1 - Planning Obligations. The Council recognises that Focused Changes are proposed in Llangennech- notably to sites Sec7/h4 and Sec7/h5, but it is considered that the role and function of the settlement is unaffected.**

**As a cross reference aid, the Council's response to representation 3356 can be viewed under its responses to policy HOM1 - Housing allocations (site Sec7/h4).**

*Action*

**No change to the Plan**



**Representation(s)****4222 - RSAI - [4993]****Object****Agent: Lichfields (Mr Arwel Evans) [3166]****Summary:**

Llangennech is a highly sustainable settlement, as reflected in its identification as a Service Centre Settlement in the LDP. The settlement is within easy reach of junction 48 of the M4 meaning that development in Llangennech is unlikely to have as much impact on the A4138 as development in Llanelli and all the other Cluster 2 settlements with the exception of Hendy/Fforest. Locating additional residential allocations in Llangennech as opposed to the settlements west of Llanelli will assist in delivering the housing requirement, in line with the settlement hierarchy, in a more proportionate manner which will, as a result assist in reducing the amount of traffic running through Llanelli. We consider that additional allocations should therefore be made in Llangennech to ensure that a suitable supply of housing is able to come forward in the short term to meet local needs. Particular reference is made to representations 4273 (comments on para 9.3) and 4227 (comments on sp16) where such matters are discussed further. Reference is made to rep 4243 where the client's site is promoted.

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*Council's Initial Response*

**Comments noted.**

The Council agrees with the respondent's comments in regards the sustainability credentials of Llangennech. In this regard, it should be noted that Paragraph 6.92 of the Role and Function Topic Paper (January 2020) outlines that Llangennech is a self-sufficient village with all the services and facilities appropriate for its scale being within close proximity. In this sense, it plays a vital service centre role within the settlement hierarchy. Its position on the M4 corridor is also recognised.

However, the Council does not agree that additional allocations should be made in Llangennech. Its development potential will be realised within the revised LDP, particularly noting the investment by Dwr Cymru Welsh Water in the waste water treatment works. The Council considers that the level of growth earmarked for Llangennech in the Plan is appropriate and deliverable given its supportive role for Llanelli within the wider cluster 2. It is important to note that Llangennech has a role to play as part of the wider cluster 2 and not in isolation and as such the overall growth figure in cluster 2 retains a strong developmental focus within the Plan. The Council recognises that Focused Changes are proposed in Llangennech - notably to sites Sec7/h4 and Sec7/h5, but it is considered that the role and function of the settlement is unaffected.

A notable consideration in the distribution of development is the importance of the Plan reflecting its evidence base in regards the Role and Function of its settlements. Reference should be made to the Role and Function Topic Paper (January 2020) which is a key piece of evidence in this regard.

With regards the wider points made by the respondent, it should be noted that the Plan reflects the role and function of settlements and seeks to be responsive in how it assigns growth, to urban and rural areas of the County. The Plan seeks to distribute growth and development spatially across the County, with settlements allocated to one of 6 clusters within the hierarchy. The cluster based approach is flexible in apportioning new growth and avoids any assumption that every settlement in every tier must contribute towards growth.

In regards the other matters raised, due regard is also given to the evidence base of the Plan - notably the Transport Background Paper (January 2020), Infrastructure Assessment Topic Paper (January 2020) and the Role and Function Topic Paper already referred to above (January 2020). Such evidence can be updated moving forward.

As a cross reference note, the Council's response to the promotion of the client's site under representation reference number 4243 can be viewed under the Council's responses to comments received under policy HOM1. The Council's response to representation reference number 4273 can be can be viewed under the Council's responses to comments received under paragraph 9.3, whilst the Council's response to representation reference number 4227 can be can be viewed under the Council's responses to comments received under policy SP16.

*Action*

**No change to the Plan.**



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**Representation(s)****4227 - RSAI - [4993]****Object****Agent: Lichfields (Mr Arwel Evans) [3166]****Summary:**

The Council notes in its candidate site assessment for SR/086/075 that the scale of allocations in Llangennech is appropriate in terms of meeting the identified growth requirement for the settlement but has not provided evidence to substantiate this claim. Llangennech has not received a suitable level of housing apportionment in the Plan - most notably within the wider cluster 2 context. In the early years of the Plan, only 2.9% of the Cluster's growth is directed to Llangennech. Should these 12 units fail to come forward it would leave a noticeable void which would be detrimental to the health of the settlement. It is unclear why the LPA has distributed the dwellings in this manner when there are better, more sustainable options available. Some, less sustainable settlements are accommodating a disproportionate amount of growth compared to Llangennech (Llangennech also outside of the proposed INF4 policy catchment - see reps 4240 comment on policy sp3 & 4266 comment on policy INF4 ). The growth requirement (107 dwellings) for Llangennech is not reflective of its role and function within Cluster 2 as a whole. No evidence has been put forward to explain why Llangennech has been apportioned the least amount of growth amongst the cluster 2 Service Settlements. There is no logic or consistency to this disproportionate approach given that Llangennech is a highly sustainable settlement with ample services and facilities. Particular reference is made to representations 4222 (sp16 comment) and 4273 (comment on para 9.3) where such matters are discussed further. Reference is made to rep 4243 where the client's site is promoted.

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***Council's Initial Response*****Comments noted**

A notable consideration in the distribution of development is the importance of the Plan reflecting its evidence base in regards the Role and Function of its settlements. Reference should be made to the Role and Function Topic Paper (January 2020) which is a key piece of evidence in this regard.

The Plan reflects the role and function of settlements and seeks to be responsive in how it assigns growth, to urban and rural areas of the County. The Plan seeks to distribute growth and development spatially across the County, with settlements allocated to one of 6 clusters within the hierarchy. The cluster based approach is flexible in apportioning new growth and avoids any assumption that every settlement in every tier must contribute towards growth. Llangennech is located within Cluster 2 (tier 2).

Paragraph 6.42 of the Role and Function Topic Paper (January 2020) outlines that this cluster along the Llanelli coastline retains a strong developmental focus, with its regeneration potential recognised within the Transformations Strategy and the Swansea Bay City Deal. Paragraph 6.92 of the Topic Paper outlines that Llangennech is a self-sufficient village with all the services and facilities appropriate for its scale being within close proximity. In this sense, it plays a vital service centre role within the settlement hierarchy. Its position on the M4 corridor is also recognised.

The Council does not agree that additional allocations should be made in Llangennech. The Council recognises that Focused Changes are proposed in Llangennech - notably to sites Sec7/h4 and Sec7/h5, but it is considered that the role and function of the settlement is unaffected.

In regards the deliverability of sites allocated in Llangennech, their allocation for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process, site pro formas are prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated with regard to and in a manner consistent with the Sustainability Appraisal. The allocations identified within the LDP make sufficient provision for the housing needs of this settlement. There is firm evidence of deliverability on these sites.

Llangennech's development potential will be realised within the revised LDP, particularly noting the investment by Dwr Cymru Welsh Water in the waste water treatment works. The Council considers that the level of growth earmarked for Llangennech in the Plan is appropriate and deliverable given its supportive role for Llanelli within the wider cluster 2. It is important to note that Llangennech has a role to play as part of the wider cluster 2 and not in isolation and as such the overall growth figure in cluster 2 retains a strong developmental focus within the Plan.

It is noted that Llangennech is outside of the proposed INF4 policy area. Reference should be made to the Council's response to representation reference number 4240 which can be viewed under the Council's responses to comments received under policy SP3, whilst the Council's response to representation reference number 4266 can be viewed under the Council's responses to comments received under policy INF4.

**As a cross reference note, the Council's response to the promotion of the client's site under representation reference number 4243 can be viewed under the Council's responses to comments received under policy HOM1. The Council's response to representation reference number 4273 can be can be viewed under the Council's responses to comments received under paragraph 9.3, whilst the Council's response to representation reference number 4222 can be can be viewed under the Council's responses to comments received under policy SP16.**

*Action*

**No change to the Plan.**



**Representation(s)****4439 Mr & Mrs E Jones [2710]****Object****Summary:**

Ardal Hendy / Fforest - Wrth nodi ystod o wrthwynebiadau sy'n benodol i safleoedd, mynegir pryderon ynghylch faint o waith datblygu sydd wedi digwydd yn yr ardal dros y blynyddoedd diwethaf o'i gymharu â chymunedau eraill yn Sir Gaerfyrddin. Mynegir pryderon ynghylch y cyd-destun trawsffiniol (Pontarddulais yn arbennig) a nodir bod angen i Gyngor Sir Gaerfyrddin a Chyngor Sir Abertawe gydweithio. Ceir problemau traffig yn yr ardal ac mae diffyg isadeiledd. Mae materion traffig lleol (nodir amser teithio i'r ysgol) yn cynnwys y brif ffordd, Heol y Fforest, cyffordd 48 (mae problemau hefyd pan orfodir yr M4 i gau rhwng cyffyrdd 47 a 49) ynghyd â Heol Bronallt a Heol Clayton.

Hendy/ Fforest area - In noting a range of site specific objections, concerns are expressed with regards the amount of development that the area has seen in recent years when compared to other communities in Carmarthenshire. Concerns expressed over cross border context (notably Pontarddulais) and it is stated that Carmarthenshire CC and CC Swansea need to work together. There are traffic problems in the area and there is a lack of infrastructure. Localised traffic issues (school run noted) include the main road, Heol y Fforest, junction 48 (there are also issues when the M4 is forced to close between junctions 47 and 49) along with Heol Bronallt and Heol Clayton.



***Council's Initial Response***

**Nodir y sylwadau.**

Mae'r Cynllun yn adlewyrchu rôl a swyddogaeth aneddiadau ac yn ceisio bod yn ymatebol o ran sut mae'n neilltuo twf i ardaloedd trefol a gwledig yn y sir. Mae'r Cynllun yn ceisio dosbarthu twf a datblygu yn ofodol ar draws y sir, gan ddyrannu aneddiadau i un o 6 chlwtwr yn yr hierarchaeth. Mae'r dull sy'n seiliedig ar glystyrau yn hyblyg wrth ddsrannu twf newydd ac mae'n osgoi unrhyw dybiaeth bod yn rhaid i bob anheddiad ym mhob haen gyfrannu at dwf. Mae'r Hendy/Fforest yng Nghlwtwr 2 (haen 2).

Mae paragraff 6.42 o'r Papur Pwnc Rôl a Swyddogaeth (Ionawr 2020) yn amlinellu bod y clwtwr hwn ar hyd morlin Llanelli yn cadw ffocws datblygiadol cryf, ac mae ei botensial adfywio'n cael ei gydnabod yn y Strategaeth Trawsnewidiadau a Bargaen Ddinesig Bae Abertawe. Mae paragraff 6.84 o'r papur pwnc hwn yn amlinellu bod yr Hendy/Fforest yn hunangynhaliol o ran bod yr holl wasanaethau a chyfleusterau sy'n briodol i'w raddfa'n agos iawn ato. Mae paragraff 6.85 yn nodi bod lefel y twf tai ar gyfer yr Hendy / Fforest yn y CDLI Diwygiedig yn adlewyrchu'r lleoliad yng nghydestun Pontarddulais a goblygiadau twf y dref honno.

Mae'r Cyngor o'r farn bod lefel y twf a glustnodwyd ar gyfer yr Hendy/Fforest yn y Cynllun yn briodol ac yn gyflawnadwy o ystyried ei rôl gefnogol i Lanelli yn ardal ehangach clwtwr 2 (nodir effaith newidiad penodol arfaethedig mewn hyn o beth hefyd - safle Sec6/h5).

Wrth nodi'r pryderon a godwyd yn y sylwadau hyn, mae'r Cyngor wedi cydnabod y cydestun trawsffiniol o ran Pontarddulais (gweler uchod) yn nhermau sicrhau lefel twf briodol. Mae'r Cyngor hefyd wedi sicrhau bod y Cynllun yn seiliedig ar sylfaen dystiolaeth gadarn.

Gellir cyfeirio hefyd at gyfres o bolisïau yn y Cynllun a all ddarparu rolau lliniarol ar lefel cais - e.e. INF1 - Rhwymedigaethau Cynllunio.

Rhoddir sylw priodol hefyd i sylfaen dystiolaeth y Cynllun - yn benodol y Papur Cefndir - Trafnidiaeth (Ionawr 2020), Papur Pwnc Asesiad Seilwaith (Ionawr 2020) a'r Papur Pwnc Rôl a Swyddogaeth (Ionawr 2020). Gellir diweddarau tystiolaeth o'r fath yn y dyfodol.

**Comments noted.**

The Plan reflects the role and function of settlements and seeks to be responsive in how it assigns growth, to urban and rural areas of the County. The Plan seeks to distribute growth and development spatially across the County, with settlements allocated to one of 6 clusters within the hierarchy. The cluster based approach is flexible in apportioning new growth and avoids any assumption that every settlement in every tier must contribute towards growth. Hendy/Fforest is located within Cluster 2 (tier 2).

Paragraph 6.42 of the Role and Function Topic Paper (January 2020) outlines that this cluster along the Llanelli coastline retains a strong developmental focus, with its regeneration potential recognised within the Transformations Strategy and the

**Swansea Bay City Deal. Paragraph 6.84 of this Topic Paper outlines that that Hendy / Fforest are self-sufficient with all the services and facilities appropriate for its scale being within close proximity. Paragraph 6.85 of the Topic Paper outlines that the level of housing growth for Hendy / Fforest within the Revised LDP reflects the location within the context of Pontarddulais and the implications of that town's growth.**

**The Council considers that the level of growth earmarked for Hendy/Fforest in the Plan is appropriate and deliverable given its supportive role for Llanelli within the wider cluster 2 (the impact of a proposed focused change in Hendy/Fforest is also noted in this regard - site Sec6/h5).**

**In noting the concerns raised within this representation, the Council has acknowledged the cross border context in regards Pontarddulais in terms of an securing an appropriate level of growth. The Council has also ensured that the Plan is based upon a robust evidence base.**

**Reference can also be made to a series of policies within the Plan that can provide mitigatory roles at application level - eg INF1 - Planning Obligations.**

**Due regard is also given to the evidence base of the Plan - notably the Transport Background Paper (January 2020), Infrastructure Assessment Topic Paper (January 2020) and the Role and Function Topic Paper (January 2020). Such evidence can be updated moving forward.**

*Action*

**Dim newid i'r Cynllun.**

**No change to the Plan.**



*Representation(s)*

**4141 Cyng. Lyndon Lloyd [4670] Object**

*Summary:*

Gwrthwynebiad bod Cenarth wedi'i gategoreiddio fel pentref cynaliadwy, dylid ei osod yn uwch i adlewyrchu categoreiddiad Ceredigion fel canolfan adnoddau.

Objection that Cenarth has been categorised as a sustainable village, it should be ranked higher to reflect Ceredigion's categorisation as a Resource Centre.

*Council's Initial Response*

**Disagree. The approach as set out within policy SP16 Strategic Policy - SP16: Sustainable Distribution - Settlement Framework is considered sound. Cenarth is considered to be appropriately identified as a sustainable village with regards to the level of services.**

*Action*

**No change to the Plan.**



**Representation(s)**

**3479 Trelech a'r Betws Community Council (Clerk Mrs Liza Marie Jones) [89] Support**

**Summary:**

Trelech Village does not have the capacity within the Welsh Water sewerage system for any more developments. There have been ongoing issues with the foul water for the village for at least the last decade and despite promises by Welsh Water to improve the treatment plant in the village, nothing has been done. It has been noted that foul water enters the water course and when there is a large amount of rainfall there is a backlog of sewerage into the village. There is also an issue with the water supply. The majority of the time, the village has low water pressure and very often no water at all. Increasing the number of properties in the village will only put even more strain on the current insufficient system.

**Council's Initial Response**

**Noted. The Council has not received any fundamental objections from statutory infrastructure providers relating to this area.**

**The LDP seeks to balance sustainable and limited growth in Trelech against environmental, social and economic constraints. Any potential new development proposal will be considered against the policies set out within the revised LDP and this includes highway, infrastructure, utility and amenity considerations.**

**Action**

**No change to the Plan.**

**Representation(s)**

**3146 Barton Willmore (Joe Ayoubkhani) [646] Support**

**Summary:**

SP 16: Sustainable Distribution - Settlement Framework  
Cwmann is identified within the Settlement Framework as a Tier 3 Sustainable Village. Whilst no explicit amendments are required within the Deposit LDP, it should be noted that Cwmann has a range of facilities and services which render it a sustainable location for significant housing growth.

However, the Revised LDP should make explicit reference (as was made within Policy SC23 of the existing LDP) to close functional relationship Cwmann enjoys with Lampeter, notwithstanding the fact that it is located within the adjacent Authority area of Ceredigion

**Council's Initial Response**

**Support is welcomed. It is considered that the request to make reference to the close functional relationship Cwmann enjoys with Lampeter is covered in paragraph 10.20.**

**Action**

**No change to the Plan.**

*Representation(s)*

**3749 Mr M Thomas [3749] Support**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Our clients have given careful consideration to the categorisation of Cross Inn as a "Rural Village", and accordingly wholeheartedly welcome and support the decision of the Authority to include the village in those settlements listed under Tier 4 within Cluster 6 of the Carmarthenshire Local Development Plan.

*Council's Initial Response*

**Support Welcomed. Further evidential work will be undertaken prior to the examination into the LDP.**

*Action*

**No change to the Plan**

*Representation(s)*

**4111 Mr Trevor Davies and Sons [5145] Support**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

The inclusion of Llansadwrn as Rural Village of Cluster 5 is both welcomed and supported.

Llansadwrn is located at a sustainable location and benefits from a number of community facilities and local services. It also has good access to nearby larger settlements that contain a wide range of local services and community facilities. Its position on a regular bus service route also further contributes to its sustainability level and as a suitable location for further housing development to serve the immediate rural community.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3100 Mr S Cooper [4829] Support**

*Summary:*

Referring to SA14 7NF, Church Road. The Development Plan appears Fundamentally Sound and I am supportive of it.

*Council's Initial Response*

**Support welcome**

*Action*

**No change to the Plan.**

*Representation(s)*

**3255 Matthew Utting [2833]**

**Support**

*Summary:*

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 a 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.

Moreover, my client supports paragraphs 11.523 to 11.526 of the LDP, which confirm that the majority of new residential development, including housing allocations (defined as sites capable of yielding 5 dwellings or more), will be directed to the County's Principal Centres over the LDP period

*Council's Initial Response*

**Support Welcomed. Further evidential work will be undertaken prior to the examination into the LDP.**

*Action*

**No change to the Plan**

*Representation(s)*

**3638 - - John Roberts Family Trust [5018]**

**Support**

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

*Summary:*

We do not object to or support Policy SP16 but offer the following commentary: Cross Hands is identified within the Settlement Framework as part of the Tier 1 Principal Centre Cluster of Ammanford/Cross Hands. Whilst no explicit amendments are required within the Deposit LDP, it should be noted that Cross Hands has a range of facilities and services. Without the provision of new housing at settlements such as Cross Hands, there exists a risk that issues of affordability would rise and the viability of existing services would be threatened. New development is required to support the viability of these services.

*Council's Initial Response*

**Noted.**

**Reference should be had to representation number 3636.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4117 Mr Martin Ingram [3506] Support**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Support the designation of Pentregwenlais as a Rural Village

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3620 Union Tavern Estate [3913] Support**

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

*Summary:*

Whilst we do not seek to object or support Policy SP16, we offer the following commentary. Gorslas is identified within the Settlement Framework as part of the Tier 1 Principal Centre Cluster of Ammanford/Cross Hands. Whilst no explicit amendments are required within the Deposit LDP, it should be noted that Gorslas is a sustainable location by virtue of its proximity to Cross Hands, the availability of services and facilities as well as sustainable travel options. We consider that new development is required to support the existing services and to provide housing which is affordable.

*Council's Initial Response*

**Noted. The policies and proposals within the revised LDP provide sufficient provision for development throughout the county's settlements.**

*Action*

**No change to the Plan.**

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## Paragraph Para 11.523

### Representation(s)

3492 Cyng Jean Lewis [3601]

Support

#### Summary:

11.523-11.526 HOM3 HOM4

Dylir rhoi sylw gofalus ar ddatblygu yn ardaloedd Haenau (Tiers) 3 a 4 i sicrhau bod cymysgedd o dai gan gynnwys rhai tai fforddiadwy yn cael eu hadeiladu i gwrdd â'r galw gan bobl leol.

Development in Tiers 3 and 4 should be carefully considered to ensure that a mix of housing including some affordable housing is built to meet the demand of local people.

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### Council's Initial Response

**Nodwyd. Mae'r Cynllun yn ceisio gwneud darpariaeth tai agored a thai fforddiadwy er mwyn cyfrannu at ddatblygu cymunedau cynaliadwy, cytbwys a chydlynol.**

**Noted. The Plan seeks to make both open market and affordable housing provision in order to contribute to the development of sustainable, balanced and cohesive communities.**

### Action

**Dim newid i'r Cynllun.**

**No change to the Plan.**

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## Policy SD1: Development Limits

### Representation(s)

3139 Mrs M L Davies [4656]

Object

#### Summary:

The inclusion of site AS/034/005 is sought within the development. It is considered appropriate for the following reasons:

The plot is set on hill which is 20 mins walk to town of Lampeter and away from heavy traffic, Lampeter to Llanwrda. It is close to the Carmarthen to Aberystwyth railway line and over the hedge from the established residential area. It is not impacted on by flooding from the Teifi river and has panoramic views from 80% of the land. It is closer to development on main road Ram area.

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### Council's Initial Response

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence.**

**The site does not accord with Stage 2 (Phase 2b) of the Site Assessment Methodology as it would have a detrimental impact on the character and setting of the settlement. Furthermore, there is sufficient and more suitable land available for development within the settlement to accommodate its housing need.**

### Action

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*Representation(s)*

**3175 Mrs Mair Kirkbride [419]**

**Object**

*Summary:*

I believe the land at Penlan, Rhydargaeau would be ideally located for development of residential properties.

The land is located approx. 10mins to the town of Carmarthen, and with easy reach of "West Wales Hospital". There is electricity and sewerage passing through the land. Regarding the highways access, we would be more than happy to comply with any needs from the Council. We are happy to comply with anything the council need E.G. affordable housing, bungalows or any other development that is required in this area. This is an objection to Policy SD1 as the site is outside development limits - site reference is AS/145/012

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence.**

**The site does not accord with Stage 2 (Phase 2b) of the Site Assessment Methodology as it would have a detrimental impact on the character and setting of the settlement. Furthermore, there is sufficient and more suitable land available for development within the settlement to accommodate its housing need.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3203 Mr Lawrence Aldridge [495]**

**Object**

*Summary:*

Objects to the inclusion of AS/019/002 - (candidate site SR/019/002) - within development limits. The issues cited include determinantal impact on the character of the village, lack of amenities and population/traffic impact. It is stated that there is plentiful provision of building plots which are not being delivered. This representation is therefore objecting to policy SD1 of the Deposit Plan in that the land is included within the development limits.

**3199 Mr Lawrence Aldridge [495]**

**Object**

*Summary:*

Objects to the inclusion of AS/019/009 - (candidate site SR/019/009) - within development limits. The issues cited include determinantal impact on the character of the village, lack of amenities and population/traffic impact. It is stated that there is plentiful provision of building plots which are not being delivered. This representation is therefore objecting to policy SD1 of the Deposit Plan in that the land is included within the development limits.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The site is considered appropriate as small scale development, and as such has been included in the development limits.**

*Action*

**No change to the plan.**



*Representation(s)*

**3400 Mr Jeff Davies [3781]**

**Object**

*Summary:*

Object to the inclusion of part of site SR/098/001 in the development limits for the following reasons:

- The B road leading to this proposed development is very narrow.
- Small bridge that only allows a single car at a time to cross, causing a lot of issues.
- Llanllwch village is already seeing increased traffic from the Travelers Rest housing development, this will only add to the daily congestion.
- Lack of visibility
- Narrow track leading into the site which I have right of way on, so I'm concerned that my rights may be affected, if this development went ahead.

**3242 Mr & Mrs C K Davies [4513]**

**Object**

*Summary:*

Objecting to the change in the development limits at this location to accommodate one or two houses.

*Council's Initial Response*

**The inclusion of the site is considered appropriate in terms of small scale rounding off suitable for 1 or 2 plots.**

*Action*

**No change to the plan.**

*Representation(s)*

**3277 Mr Alan Jones [4004]**

**Object**

*Summary:*

SR/043/001 - The defined limits of Pantycelyn are shown incorrectly and should be amended accordingly

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The site does not accord with Stage 1 of the Site Assessment Methodology as it is detached from, and unrelated to an identified settlement within the Deposit LDP.**

*Action*

**No change to the plan.**

*Representation(s)*

**3230 Robert Thomas [4873]**

**Object**

*Summary:*

We believe that the inclusion of site number SR/095/006 will have a detrimental impact on the safety of pedestrians and drivers accessing the proposed site development.

*Council's Initial Response*

**Whilst the site is within the proposed development limits it will be for a planning application to determine the acceptability of any potential proposal. Highway considerations will be considered as part of any application.**

*Action*

**No change to the Plan**

*Representation(s)*

**3262 Mr Jeff Wheeler [4847]**

**Object**

*Summary:*

We would like to appeal the decision not to include our plan SR/O53/O01 submission ref-CAO171 into the L.D.P. plan. We have been told it is because they do not like (ribbon development). We understand what you are trying to say but do not entirely agree with this policy.

Reduce site from 4 dwellings to 2 dwellings

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan**

*Representation(s)*

**3411 Mr D & S Lloyd [4974]**

**Object**

*Summary:*

Objection to the omission of site SR/133/001 from the development limits of Pen y Mynydd.

Provided the road drainage which runs into the field is rectified, we have no objections for Mr Pulham`s application - whom we have known for over 40 years - for one only bungalow and garage to be included in the local development plan in the field next to our property.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Paper. The site is located with an area which falls within a Tier 4 settlement.**

*Action*

**No change to the Plan.**



**Representation(s)****3413 M Evans [4975]****Object****Summary:**

I would like to put my concerns to the development plans that have been put forward for Old School Road LLansteffan:

The road its self is a single road use age. Which is already having large volume daily use.

Would it not be better to see how the village gets on with Meas Griffiths development first?

If we are not careful LLansteffan could lose its appealing ness, and became smothered in houses.

The infrastructure needs to be looked at. The Extra volume of vehicles could increase our air pollution.

Please don't lose sight of the aesthetics of this village.

**3412 Mr & Mrs JF & BC Moore [584]****Object****Summary:**

Objection to the development limits on Old School Road, LLansteffan.

The road has deteriorated the last few years , due to excessive traffic , adding to the breaking up of the surface.

The road cannot take anymore traffic and it cannot be made any wider as there are houses both sides of the road.

Whilst we accept that some infill is able to take place, any major development would put strain on the services and add danger to other existing road users..

The recent wet weather has exposed the venerability of the road with water draining from the fields.

**3415 Mrs J Berrow [582]****Object****Summary:**

Concerns regarding the proposed development on Old School Rd LLansteffan:

1. The current road is not able to support the traffic;
2. Water from fields from the top of old school rd to the centre of the village is an issue;
3. Would it not be sensible to see the effect of the Maes Griffiths development before agreeing to further development?
4. Affordable housing. The current status of holiday and second properties within the village should be considered.
5. Perhaps postponement of any potential development should be considered in light of the current situation regarding Covid 19.

*Council's Initial Response*

The development limits have been re-drawn to potentially allow small scale development to take place along Old School Road. Any potential new proposal will be considered against the policies set out within the revised LDP. This includes highway, infrastructure and amenity considerations and will form part of a planning application process should a development be taken forward to application stage.

*Action*

No change to the Plan.

*Representation(s)*

3571 Mr Michael Palmer [3264] Object

*Summary:*

Objection to the inclusion of SR/156/001 within development limits, as the proposal would have an adverse impact on the neighbouring property by virtue of ecology, unmapped pre-historic burial site, intrusion, detrimental to effect to the use of land and to quality of life, negative impact on the value of the property, privacy and impact on well being.

Secondly there is no demand within the area.

*Council's Initial Response*

Noted. The site has been included to allow the flexibility for potential future development within a settlement with otherwise very limited growth. Any potential proposal will be considered against the policies set out within the revised LDP.

*Action*

No change to the Plan.

*Representation(s)*

3668 Mr & Mrs P Davies [2847] Object

*Agent: Mr Mark Stephens [5035]*

*Summary:*

Seek the inclusion of candidate site SR/083/001 within the LDP.

*Council's Initial Response*

Agree. Change the development limits to include the candidate site. The site is to be included to allow the flexibility for potential future development within a settlement with otherwise very limited growth. Any potential proposal will be considered against the policies set out within the revised LDP.

*Action*

Change to the Proposal Maps for Llandyfaelog

*Representation(s)*

**3148 Mr Phillip Davies [4803]**

**Object**

*Summary:*

SR/083/001

There is limited opportunity to develop in the village therefore moving the line will allow for this.

At the moment the LDP line was only extended slightly, however, this will take away the neighbours amenity space, namely outbuildings and garden

Want to keep the balance of the street and mirror opposite to keep the character of the area.

To give people who were born and work in the local area the ability to build a greener and more sustainable home. This would strengthen the position of the Welsh language through allowing Welsh speakers to remain in their communities.

**3231 Llandyfaelog Community Council (Mr Arfon Davies,) [46]**

**Object**

*Summary:*

Object to the non-inclusion of the candidate site SR/083/001. Llandyfaelog Community Council believes that the LDP should be revisited in relation to these two candidate sites. The Council would wish to see at least parts of these included to enable scope for future development within Llandyfaelog village.

*Council's Initial Response*

**Agree. Change the development limits to include the candidate site. The site is to be included to allow the flexibility for potential future development within a settlement with otherwise very limited growth. Any potential proposal will be considered against the policies set out within the revised LDP.**

*Action*

=====

*Representation(s)*

**4452 Mr Eirian Williams [877]**

**Object**

*Summary:*

I would like to submit observations in relation to the lack of a black-line development limit at Cynheidre. I have land in this area, part of which I would wish to develop. My intention would be to construct a maximum of four dwellings which would not increase the village by 20% of the current numbers of dwellings. It is a logical extension to round off the development pattern that fits in with the character of the village form and landscape as per Policy SP16. The land is of a scrub nature and new development would be more aesthetically pleasing than it is at present. I do not wish to construct further dwellings creating a ribbon development and, as I own the land beyond the requested area marked in red on the attached map, for around 150 yards there will be no chance of applications for further development to be made in the future. I ask that this small area is included within the Local Development 'black-line' limit for Cynheidre. There is an existing physical feature in the form of two dwellings recently completed across the road which would form the boundary for the group. The whole of the proposed land is well within a road subject to a thirty miles per hour speed limit. These recently completed detached dwellings on the opposite side of the road do not yet show on the current maps. Furthermore, my proposed 'black line' ends approximately opposite the edge of the two new dwellings which does not extend the village beyond the existing boundary. Mains drainage is present immediately alongside my proposed land as is mains electricity. Mains water is available on the opposite side of the road. This is an objection to the non inclusion of site within development limits (policy SD1) site ref is AS/046/003. Reference is made to representation 4453 under policy SP16.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The site does not accord with Stage 2a - Initial Detailed Site Assessment of the Site Assessment Methodology for the following reason: The site is within a Tier 4 settlement and therefore any site proposal will be considered under policies set out within the revised LDP.**

**Reference should be made to the Council's response to representation reference number 4453 under policy sp16.**

*Action*

**No change to the Plan.**



**Representation(s)****3951 Mr Cooper [3549]****Object****Agent: Architectural Design Services (Swansea) Ltd (Mr P Johnson) [866]****Summary:**

The site links naturally to the existing semi detached residential houses all of which were originally constructed back in the days when the client was a local developer. It was always the intention to develop this parcel of land for housing, especially as it formed part of the land purchased originally. The site at one stage was included in the Development Limits - revisit the previous UDP to verify this and would be pleased to know the reason that this was changed. The site is not within a flood plain and has good access on to the highway. There is reference to the seeking of specialist reports by the client - including ecological and flood consequence considerations. The highway directly adjacent is the A484. This has a 30mph limit and there is good access and turning area - highway safety ensured. If developed, the building line can be respected and can conform to the Local Planning Policies. If the parcel of land was allowed to be developed it would take the form of a sustainable development with the features of a Ground Source Heat Pump, Solar Panels positioned at roof level. The drainage would be designed with a SUDS system and all materials would be sourced locally for the construction. The site is close to local shops, Schools and the Country Park.. It is close to the local bus route and cycle route linking the site to Llanelli, Kidwelly and Carmarthen. Client prepared to provide the site for affordable housing to meet the local needs and enter into s106. Welsh Government is committed to increasing the supply of new homes, stimulating economic growth, creating jobs and meeting housing needs and I am of the opinion that this should be supported by the Carmarthenshire County Council. Objection to the non-inclusion of SR/016/004 (site ref ALT/016/004) within the development limits - reference may also be made to representation 3953 under policy SD1.

**Council's Initial Response**

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**Reference is made to the Council's response to representation 3953 as part of its responses to comments received under policy SD1.**

**Action**

**No change to the Plan.**

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*Representation(s)*

**3953 Mr Cooper [3549]**

**Object**

**Agent: Architectural Design Services (Swansea) Ltd (Mr P Johnson) [866]**

*Summary:*

Objection - seeks drawing of development limits at Maesybryn, Pembrey (AS/016/023) as part of the promotion of the client's site - see representation 3951 under policy SD1. Existing semi detached residential houses all of which were originally constructed back in the days when the client was a local developer. It was always the intention to develop a further parcel of land for housing (see rep 3951), especially as it formed part of the land purchased originally. That site was at one stage was included in the Development Limits - revisit the previous UDP to verify this and would be pleased to know the reason that this was changed. Close to local shops, Schools and the Country Park, local bus route and cycle route linking to Llanelli, Kidwelly and Carmarthen. Approx start of 30 mph limit annotated on the proposed site plan provided, along with denoting of the development limits at Lando Road.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The proposal to introduce development limits at this location does not accord with Stage 2 (Phase 2b) of the Site Assessment Methodology as this would be contrary to general planning principles in that it would represent an unacceptable extension to the settlement. It is considered that the cluster of dwellings (less than 20 units) is spatially detached from Pembrey and represent an 'outlier' in this regard.**

**Reference is made to the Council's response to representation 3951 as part of its responses to comments received under policy SD1.**

*Action*

**No change to the Plan.**



**Representation(s)****4027 Cllr Ken Lloyd [4612]****Object****Summary:**

Objection to inclusion of candidate site SR/021/007 in development limits, site ref AS/021/007. This is an area of rich habitat and wildlife and such areas have a vital role to play in delivering the Council's corporate goals, both social and economic, as well as supporting the seven Well-being Goals set out in the Well-being of Future Generations (Wales) Act 2015. More development here will have a disproportionate negative impact on the natural environment as well as amenity of residents. Reference is made to paragraph 6.6.19 of the current LDP policy number EQ2 as well as PPW (an emphasis on people and places in decision making). Sites need to be near and easily accessible to existing infrastructure, such as good road links, schools, colleges, parks, GP surgeries, if only to meet the needs of the Active Travel Act. Development on this site will require serious improvements to Springfield Road, Long Acre Road and Wellfield Road. The residents and myself are fearful that further development will only exacerbate the existing problems.

**3068 MR MEREDYDD EDWARDS [2598]****Object****Summary:**

Objection to the proposed development limit boundary moving from the rear boundary of our property to the far side boundary of the field immediately abutting our property (SR/021/007) for the following reasons - 1. additional traffic generation on a road that is not suitable for further development (single track in places) 2. Harmful effect on amenity of our property — overlooking / loss of privacy. Please see more detailed representations attached.

**3711 Mr Derek Edwards [4951]****Object****Summary:**

We object to further development (site SR/021/007) for the following reasons:

- The approach road is hazardous;
- The area is dangerous to pedestrians as there are no pavements;
- The junction at the bottom of Springfield Hill and Wellfield Road often has parked cars;
- Extra traffic will add to these hazards.

**3073 Roger & Joanna Phillips [3742]****Object****Summary:**

Objection to proposed development limit boundary from the rear of our property. Any development on this field would result in loss of privacy, to main private area of garden and look directly into our kitchen dining rooms, conservatory and two main bedrooms. Highway- Springfield rd is far from suitable for any more traffic with a narrowing 40 metre length where only one car can pass at any time. Previous applications submitted in the past have been refused for these very reasons.

**3770 Mr R Denholm [3220]****Object***Summary:*

I object to the inclusion of site SR/021/007 within the development limits on two counts:

1. Both possible access points, one on to Heol y Delyn at the already dangerous junction with Springfield Rd and the other further up Springfield Rd are unsuitable.

2. In general any further traffic should be avoided on Cwmoernant, Heol y Delyn, Wellfield Rd, Longacre and Capel Evan Rd. Both Springfield Rd (single track in places) and Longacre have no footpaths and no possibility that they could be provided. The junction between Longacre and Capel Evan Rd and Park Hall is congested & dangerous and a school bus pick up and drop off point. I believe there should be no further developments feeding traffic onto Springfield Rd or Capel Evan Rd.

**3404 Mr Gareth Jones [3448]****Object***Summary:*

Objection to the inclusion of site SR/021/007 within the development limits of Carmarthen.

I am objecting on the grounds that increased traffic flow on Springfield Road will be detrimental to pedestrians. There is no pedestrian footpath nor is there likely to be one. Children walking to school will be at increased risk.

There will be increased traffic congestion not only in Springfield Road, but also in Wellfield Road and Longacre Road.

The junction of Springfield Road and Heol y Delyn is dangerous at present due to cars being parked on the sharp steep corner entrance to Heol y Delyn.

**3407 Ms Sally Bere [3602]****Object***Summary:*

Objection to the inclusion of site SR/021/007 within the development limits.

This would bring the development boundary right up to the edge of the Bluebell Woods which are both ecologically sensitive and of high landscape value.

In addition development within the proposed extension to the boundary would result in "backlands" development of up to 4 dwellings which would have a negative impact on the amenity of adjoining properties, as would the necessary access arrangements.

**4029 Mr and Mrs Robert and Gaynor Hathway [5129]****Object***Summary:*

Objection to the inclusion of candidate site SR/021/007 within limits (site ref AS/021/007).

Opposition to further housing development off Springfield road and Cwmoernant - this is based on the the following facts 1. Traffic along Wellfield road is already chaotic - for most part of the road there is insufficient width for two cars to pass each other which results in cars driving up onto the narrow pavements. 2. Springfield road itself is quite narrow and has a choke point about 2/3rds of the way up. Adding more housing with say 2 cars per household would significantly increase the traffic problems which already exist 3. The area to be included in the development plan adjacent to these areas support a large array of wildlife.

With the enormous housing development going on the west of the town already why is it necessary to destroy these oases of wildlife so close to the town centre.

**3772 Mr Ceredig Emanuel [4942]**

**Object**

*Summary:*

This is an objection for the inclusion of site SR/021/007 within the development limits. The proposed access to Heol y Delyn is extremely unsafe. The junction at the end of Heol y Delyn is already quite dangerous (on a sharp bend, steep slope and sometimes compromised by parked cars often parking on the pavement) and more vehicles attempting to exit their homes onto it would increase the dangers. Increased traffic on Springfield Road is unsuitable.

**3312 Ms Petra Wood [2690]**

**Object**

*Summary:*

Objects to the inclusion of SR/021/007 within the limits and therefore an objection to Policy SD1. Concerns include access along Springfield Road being very limited with the road being narrow, so that any additional traffic will mean endangering residents (e.g. children on their way to school) as well as other pedestrians. Cwmoernant and Springfield Road has a public footpath that is part of the strategic walking route network. Extending boundaries of the LDP in this area means both danger through increased traffic (as above) as well as changing the characteristics of this mainly rural area. Springfield Road has conservation areas and large green areas which currently are supported by natural wildlife corridors into the area beyond Carmarthen town limits as well as towards the reservoirs. Extending boundaries of the LDP in this area means limiting wildlife with potential loss of a large number of species.

*Council's Initial Response*

**The inclusion of the site is considered appropriate in terms of small scale rounding off suitable for less than 5 dwellings (the indicative plans submitted as part of the candidate site illustrate 2 dwellings). The site has been included to allow the flexibility for potential future development within a growth settlement for individual, larger plots. Any potential proposal will be considered against the policies set out within the revised LDP.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3280 Mr Alix Alliston [4822]**

**Object**

*Summary:*

Promotion of a new candidate site.

Currently, the settlement boundaries of Capel Dewi are in two main sections, East and West, dividing the village and the community. My proposal is to join the village together.

The Land at Capel Dewi Lodge appears to be the last piece of suitable, sustainable undeveloped land within the village.

Of the five Current Applications I believe only one can be considered as infill (SR/017/004) where as the other four appear to be extending the village, which has, and would inevitably result in the loss of valuable agricultural land. (SR/017/002) and (SR/017/005) also current build site (SuV16/h1).

*Council's Initial Response*

**Development of the site would lead to an unnecessary encroachment beyond the development limits.**

**There is sufficient and more suitable land available for residential development within the village to accommodate its housing needs.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3329 Mr & Mrs T Dennard [362]**

**Object**

*Summary:*

Objection to the exclusion of candidate site SR/025/001 (CA0087) in Cefnbrynbrain.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3986 Mr Phil Mann [2574]**

**Object**

**Agent: Mr Stuart Owen [731]**

*Summary:*

Objection to SD1 by seeking the inclusion of part of site SR/067/004, and that in not allocating this site for residential development and ensuring removal of an inappropriate use which is detrimental to the amenity and safety of the residents of Gorslas is unsound.

*Council's Initial Response*

**The site does not accord with Stage 2 (Phase 2b) of the Site Assessment Methodology for the following reasons. The site comprises a longstanding allocation, part of which has been developed. The remaining part of the allocation will be deallocated as it comprises an area of ecological value and there are concerns regarding the delivery of the site. There is sufficient and more suitable land available for residential development within the town/village to accommodate its housing needs.**

*Action*

**No change to the plan**

*Representation(s)*

**3439 Mr W M Jones [4010]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the omission of candidate site S/063/003.

The inclusion of this site within the development limits for Four Roads would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table.**

**Four Roads has been defined as a Tier 4 settlement, and therefore the village does not have development limits. Any proposal will be considered against the policies set out within Policy HOM3 of the revised LDP.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3463 Mr D Morris [4990]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of a site from development limits.

The inclusion of this site within the development limits for Meinciau would correct an anomaly where the existing development limits cut through the middle of an agricultural barn and associated farmyard. The suggested amendment would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**Agree. Amendment to be made to re-configure the development limits to follow the existing pattern of the existing built form.**

*Action*

**Change to the plan.**

*Representation(s)*

**3389 Mrs Sandra Y Evans [601]**

**Object**

*Summary:*

Objection to the exclusion of a site from the development limits of Llandyfaelog. The site is close to the heart of the village with the village hall, pub and church being in close proximity. There is a genuine need for the type of development at this location as there are no other building opportunities in the village and properties do not come up for sale often. This makes it very difficult for local people to remain in the village or move back and sustain the character and Welsh language of the village.

**3232 Llandyfaelog Community Council (Mr Arfon Davies,) [46]**

**Object**

*Summary:*

Object the non-inclusion of SR/083/002. Llandyfaelog Community Council believes that the LDP should be revisited in relation to these two candidate sites. The Council would wish to see at least parts of these included to enable scope for future development within Llandyfaelog village.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**The site would be an illogical extension to the settlement by impacting on the rural nature of Llandyfaelog and the character of the area.**

*Action*

*Representation(s)*

**3240 Mr Ronald Davies [614]**

**Object**

*Summary:*

Land fronting Capel Seion Road, land adjacent to 55 Greenfield Terrace. The site reference is AS/138/002 (previously promoted as candidate site SR/138/002). The plot is vacant, and is of no significance as agricultural land, there are no highways visibility issues (photo is enclosed) main sewerage is available to sight. The site is a natural extension to the settlement, (land registry official copy of title plan is enclosed) and in keeping with development that has already taken place. This is therefore an objection to policy SD1 in that the land is omitted from the development limits.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the plan**



*Representation(s)*

**3276 J R Harrison [539]**

**Object**

*Summary:*

Object to the non-inclusion of site SR/098/002 - Land to the east of Manor Way Llanllwch, and seek a small part of that candidateland to be brought forward within limits for small scale development.

*Council's Initial Response*

**Agree to the inclusion of a smaller part of site AS/098/002 as requested, it is considered acceptable to include the site within the development limits to allow the flexibility for potential future development within a settlement with otherwise very limited growth. Any potential proposal will be considered against the policies set out within the revised LDP.**

*Action*

**Amend development limits in Llanllwch to include site AS/098/004.**





*Representation(s)*

**3311 ms Nicola Kelly [2686]**

**Object**

*Summary:*

My field is let out on a yearly lease. It is in continued use and accessed off the lane, so there would no extra traffic if planning was given. Chickens and ducks are kept on the yard with plans for a few sheep. Vegetables are being grown on site. What I would love to obtain is planning for a small swelling. Just one. Down by the fence by the double story garage at the bottom of my yard. This would mean that any dwelling could be in line with this building so would not be seen obstruct any properties. So would in fact be a wonderful 2 1/2 acre small holding. This is therefore an objection to SD1 in that candidate site SR/062/002 is included within the development limits.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the Plan**



*Representation(s)*

**3433 Mr M Jones [3676]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of site SR/138/021 from development limits. The inclusion of this site within the development limits for Pontyberem would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to Plan**



*Representation(s)*

**3437 Mr H Wilkins [4091]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of candidate site SR/004/038. The inclusion of this site within the development limits for Ammanford would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the Plan**

*Representation(s)*

**3449 Mr C Price [3981]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of site SR/159/009. The inclusion of this site within the development limits for Tycores would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the Plan**

*Representation(s)*

**3457 Mr R Rees [3945]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of site SR/062/005 from the development limits.

The inclusion of this site within the development limits for Foelgastell would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

**3456 Mr B McAndrew [3982]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of site SR/067/011 from the development limits.

The inclusion of this site within the development limits for Capel Hendre would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to Plan**



*Representation(s)*

**3453 Mr K Jones [4090]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the omission of site SR/004/037 - Land at Waun Clyn Cath Uchaf, Wern Ddu Road, Ammanford.

The inclusion of this site within the development limits for Ammanford would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the Plan**

*Representation(s)*

**3467 Ms L Rooke [846]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of site SR/070/003 from within the development limits for Heol Ddu.

The inclusion of this site within the development limits for Heol Ddu would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the Plan**

*Representation(s)*

**3487 Mr P Flinders [3993]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Request for site's inclusion within the development limits of Milo.  
The site forms part of the urban form of a sustainable village, the growth of which will be of benefit to the socio-economic future of the rural economy. The site is not located within or immediately adjacent to any sites designated for importance to nature conservation and is not at risk from flooding.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic plan**

*Action*

**No change to the Plan**



*Representation(s)*

**3550 Gwonego Homes Ltd [5004]**

**Object**

**Agent: Atriarc Planning and Construction (Mr Wayne Reynolds) [745]**

*Summary:*

Objection to the omission of site SR/082/004 from the development limits of Llandybie in the Deposit LDP:

It is noted that the site could not accommodate 5 or more dwellings, however the inclusion of the site would not see an illogical extension of the urban form.

The key site characteristics are noted as follows,

- Relatively level site;
- Electrical, gas and sewage utilities in close proximity;
- No negative impact to existing vehicle and pedestrian safety;
- Clear opportunities to incorporating sustainable drainage systems on site;
- High demand for properties in the area, both home owner and affordable housing;
- No protected historical structures known on site;
- No known environmental designations on site that would limit the site coming forward;
- No known flood risk on site;
- Good public and private vehicular access to and from site.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the Plan**

*Representation(s)*

3591 Mr J Waine [4077]

Object

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Objection to the exclusion of candidate site SR/026/005 from the development limits of the Deposit Revised LDP.

The Site in question lies immediately adjoining the settlement of Cross Hands by virtue of it being immediately adjoining by existing residential development about Garreg Holtt. As a result, its inclusion within the defined Development Limits of the settlement would represent a reasonable and logical form of rounding-off alongside established properties, and mirroring new development off the opposite, eastern flank of the road. Furthermore, through this change to the Limits, the Site would then provide an opportunity to accommodate three detached dwellings at this location.

*Council's Initial Response*

**Agreed. The inclusion of the candidate site would allow the flexibility for potential small scale /single plot development. The site accords with the main planning principles of the site assessment methodology.**

*Action*

**Change to the Plan**



*Representation(s)*

**3598 Mr D Thomas [3921]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Objection to the exclusion of site SR/067/006 under policy SD1. The development limits should be altered to accommodate the site.

The Site forms a logical extension to the existing settlement, being well related to it and being positioned at a location within the wider landscape to not form a prominent or logical part of the surrounding open countryside.

The Site lies within close proximity and walking distance of the existing community services and local facilities of the adjoining settlement, which will ensure it makes a positive contribution to both national and local sustainable development objectives.

The Site also benefits from well served excellent public transport links to the nearby settlements, and the larger towns of Ammanford and Cross Hands.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the Plan**





*Representation(s)*

**3616 Mr A Watts [4071]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Objection to the exclusion of candidate site ref SR/026/004 under Policy SD1:

The Site in question lies immediately adjoining the settlement of Cefneithin by virtue of it being immediately adjoining by existing residential development about Heol-Yr-Ysgol. As a result, its inclusion within the defined Development Limits of the settlement would represent a reasonable and logical form of rounding-off. Furthermore, through this change to the Limits, as has been illustrated on the accompanying drawing, the Site would then provide an opportunity to accommodate five semi-detached and detached residential dwellings at this location.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Assessment of Sites paper. The initial representation requesting its inclusion raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers**

*Action*

**No change to the Plan**

*Representation(s)*

**3116 BA George [4839]**

**Object**

*Summary:*

Cynheidre Caravan park is within the boundary of Cynheidre Village as it is located before the national speed limit signage. Originally promoted for a scale of development that would seek its allocation for housing (+5 units), subsequent correspondence states that the site is to be promoted for 4 homes only - therefore this is an objection against policy SD1 of the Plan. It is stated that this will not exceed 20% of the number of existing homes and will adjoin the boundary of an existing property and qualifies as a 'logical extension, rounding off of the development pattern that fits in with the character of the village form and landscape'. Objection to Policy SD1 as the site (different area to that previously promoted as candidate site SR/046/001) is not included in the development limits of the deposit LDP. Site reference AS/046/002. Refer to representation 3117 (policy sp16).

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The site does not accord with Stage 2a - Initial Detailed Site Assessment of the Site Assessment Methodology for the following reason: The site is within a Tier 4 settlement and therefore any site proposal will be considered under policies set out within the revised LDP.**

**Reference should be made to the Council's response to representation reference number 3117 (policy sp16).**

*Action*

**No change to the Plan.**



*Representation(s)*

**3395 Mr & Mrs D & J Phillips [4965]**

**Object**

*Summary:*

Objection to non inclusion of candidate site SR/061/004 under policy SD1.

There are a dozen properties to one side, two on the other and one opposite, we feel that this would be an ideal location for the grandchildren to build their own homes enabling them to stay in the area, providing a support network for the family.

The properties would be sympathetically built taking into account neighbouring properties and the location. The land sits very close to the only remaining open Chapel in the village.

Site reference AS/061/004.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3423 Mr D Griffiths [4977]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

The inclusion of this site within the development limits for Burry Port would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community. Objection to non inclusion of candidate site SR/016/002, objection site reference is AS/016/002.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3445 Mr J Nicholls [4089] Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of site SR/061/009 from the development limits for Horeb, objection site reference is AS/061/009.

The inclusion of this site within the development limits for Horeb would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Sites Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3447 Messrs T & B Evans & Owen [4984] Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to exclusion of site SR/021/051 from the development limits. The inclusion of this site within the development limits for Ffynnonddrain would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3442 Messrs T & B Evans & Owen [4984] Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to exclusion of site SR/101/002.  
The inclusion of this site within the development limits for Llanpumsaint would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3444 Mr M Evans [4086] Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to the exclusion of site SR/088/006.  
  
The inclusion of this site within the development limits for Llanfihangel-ar-Arth would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3446 Mr M Jones [3676] Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Objection to exclusion of site SR/021/009 from the development limits.

The inclusion of this site within the development limits for Carmarthen would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3503 Mr & Mrs Packham [4995] Object**

**Agent: ARCHISPEC (Mr Paul Nicholls) [5019]**

*Summary:*

Objection to the removal of the eastern remaining allocation of SC22/h1 from the Revised Deposit LDP.

The western element of this site has already been developed by third parties, however the eastern element has only recently been able to come forward due to loss of property deeds which has recently been rectified.

Ty Glyn has recently (2018) been purchased by the current owners. One of the prime reasons for purchasing was on the basis that the land was allocated.

An outline Planning Application has already been lodged under the current LDP for residential development (LPA ref TA86847 pending validation) and it is the current owners' full intention to develop the land in accordance with its designation at time of purchase.

*Council's Initial Response*

**Agree to place site within the development limits. The site was removed due to concerns about deliverability, however, the agent has created a lower density scheme which is currently being considered as a planning application. The whole site would deliver less than 5 units, therefore this would be a change to the development limits only.**

*Action*

**Agreed, amend development limits in Llanllwni to include site AS/099/006.**

*Representation(s)*

**3585 Mr A Green [5005]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

We seek inclusion of the site within the development limits for small scale development of 4 dwellings. It is considered that the sustainability attributes of Peniel can support the inclusion of the site in addition to the 2 allocations allocated within the Deposit LDP. Our clients have illustrated that their indicative proposals will not appear at odds to the prevailing spatial pattern of development in Peniel and would be respectful to the character and setting of the locality.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. There is sufficient and more suitable land available for residential development within the town/village to accommodate its housing needs.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3592 Mr H & N M Evans [4079]**

**Object**

*Summary:*

Objection to the exclusion of candidate site referenced SR/145/011 within the development limits of Rhydargaeau.

The site's inclusion would be consistent with the inclusion of other small sites in the village and it is considered that the site's inclusion would constitute 'logical extensions and/or rounding off of the development pattern that fits in with the character of the village form and landscape' as referred to in Policy HOM3 of the Deposit Plan.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No Change to the Plan**

*Representation(s)*

**3225 Mr Richard John [4882]**

**Object**

*Summary:*

Object to the non-inclusion of the site now known as AS/058/004.

This site is for up to 3 dwellings.

*Council's Initial Response*

**Agree in part. Amend a part of the candidate site to allow the flexibility for potential future development within a settlement with otherwise very limited small site growth. Any potential development will need to comply with the policies and proposals set out within the revised LDP.**

*Action*

**Change to the Plan.**

*Representation(s)*

**4375 Mrs Susan Evans [3049]**

**Object**

*Summary:*

Object to the inclusion of SR/077/002 in the Deposit LDP and highlights material planning considerations for its exclusion

*Council's Initial Response*

**The site has been included to allow the flexibility for potential future development within a settlement with otherwise very limited growth. Any potential proposal will be considered against the policies set out within the revised LDP.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4540 Mr W M Jones [4010]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

The site's inclusion within reinstated development limits for Four Roads would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type.

Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

In addition, residential development at this location:-

- \* would not be detrimental to the amenity of adjacent properties;
- \* would satisfy recognised housing and sustainability objectives;
- \* would not have a detrimental impact on the landscape or nature conservation interests.

Furthermore, the site is not impeded by any access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints and its delivery, if allocated, is assured

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table.**

**Four Roads has been defined as a Tier 4 settlement, and therefore the village does not have development limits. Any proposal will be considered against the policies set out within Policy HOM3 of the revised LDP.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4406 A Roberts [5167]**

**Object**

*Summary:*

Seek the inclusion of new candidate site AS/113/011 within the revised LDP.

*Council's Initial Response*

**The site does not accord with Stage 2 (Phase 2b) of the Site Assessment Methodology as its inclusion would result in an illogical extension to the settlement, and there is sufficient and more appropriate land available for residential development within the village.**

*Action*

**No change to the Plan**

*Representation(s)*

3669 Mr K G Morgans [613]

Object

**Agent: Mr Mark Stephens [5035]**

*Summary:*

Seek the inclusion of the proposed site within the development limits of Pontyates.

*Council's Initial Response*

**Development of the site would have a detrimental impact on its setting and character, including the close proximity of a burial ground and the extensive hedgerows on the southern and eastern side.**

*Action*

**No change to the Plan.**

*Representation(s)*

3670 Caroline Davies [5036]

Object

**Agent: Mr Mark Stephens [5035]**

*Summary:*

Seek the inclusion of new candidate site AS/113/009 within Pontyates

*Council's Initial Response*

**The site would represent an illogical extension to the settlement as it is densely vegetated, and it would have a detrimental impact on ecology and its local habitat.**

*Action*

**No change to the Plan**

*Representation(s)*

3671 Caroline Davies [5036]

Object

**Agent: Mr Mark Stephens [5035]**

*Summary:*

Seek the inclusion of new candidate site in Pontyates - AS/113/010 within the LDP.

*Council's Initial Response*

**The site does not accord with Stage 2 (Phase 2b) of the Site Assessment Methodology as it would result in an illogical extension to the settlement by means of backland development.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4534 Mr D Williams [3994]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

The site's inclusion within reinstated development limits for Mynyddcerrig would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type.

Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

In addition, residential development at this location:-

- \* would not be detrimental to the amenity of adjacent properties;
- \* would satisfy recognised housing and sustainability objectives;
- \* would not have a detrimental impact on the landscape or nature conservation interests.

Furthermore, the site is not impeded by any access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints and its delivery, if allocated, is assured.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**Mynyddcerrig has been classified as a settlement within Tier 4 of the settlement hierarchy and therefore any site proposal will be considered under policies set out within the revised LDP, most notably Policy HOM3.**

*Action*

**No change to the Plan**



*Representation(s)*

**3792 Mr M Thomas [5059]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

It is requested that the development limits are amended to allow for small infill change to the development limits under policy SD1. A detailed supporting statement has been provided to support the case. Three dwellinghouses will not appear at odds to the prevailing spatial pattern of development in

Capel Iwan. The locality has numerous examples of modern frontage development being completed at edge of settlement locations, which in turn, advocates that the form of development proposed at land at Cruglwyd is no different, resulting in it being respectful to the character and setting of the locality.

*Council's Initial Response*

**A larger site was submitted as a candidate site and has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The submission of a smaller part of the site remains is considered to be unacceptable as there are more appropriate sites elsewhere within the settlement. The representation raises no additional information to justify inclusion of the additional land. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4463 Mr & Mrs B E & D R Harries [380]**

**Object**

*Summary:*

Object SD1 and seek the inclusion of candidate site AS/167/002 into the revised LDP.

*Council's Initial Response*

**Broadway has been defined as a Tier 4 settlement, and therefore it does not have development limits. Any proposal will be considered against the policies set out within Policy HOM3 of the revised LDP.**

*Action*

**No change to the Plan**

*Representation(s)*

**3226 Mr D Panayiotiou [4676]**

**Object**

*Summary:*

I would really appreciate it if the limit line could be considered to be moved. Objection to the non-inclusion of land within the development limits at Llys Pendderi. Site reference AS/086/078.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The site does not accord with Stage 2a of the Site Assessment Methodology for the following reason - the site cannot accommodate 5 or more dwellings.**

**In terms of including the site within the development limits, the site's position within the urban form is noted. It is considered that its inclusion within the development limits would not have a detrimental impact on the character and setting of the settlement or its features.**

**The development limits will be amended to allow small scale development to take place, subject to any future proposal meeting the policies and provisions of the Plan as a whole.**

*Action*

**Change to the Plan (focused change) to include the site within development limits.**



*Representation(s)*

**4454 David Potter [5250]**

**Object**

*Summary:*

Include Cae-Du into the revised LDP. Being one of a few privet residential properties excluded from the LDP we now wish to be included to allow for future development of the land for residential purposes to accommodate new family members. This is an objection against Policy SD1 in that the site is outside of the Development limits in the deposit Revised LDP - site reference is AS/086/089.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The site does not accord with Stage 2a of the Site Assessment Methodology for the following reason - the site cannot accommodate 5 or more dwellings.**

**In terms of including the site within the development limits, the site's position within the urban form is noted. It is considered that its inclusion within the development limits would not have a detrimental impact on the character and setting of the settlement or its features.**

**The development limits will be amended to allow small scale development to take place, subject to any future proposal meeting the policies and provisions of the Plan as a whole.**

*Action*

**Change to the Plan (focused change) to include the site within the development limits.**

*Representation(s)*

**3833 Mr & Mrs Jones [5073]**

**Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Support for the inclusion of Whitemill in policy SP16. We would highlight that our Clients land represents one such opportunity for new housing development and being well related to the existing form of the village, it would represent a logical round-off opportunity (as supported by Policy HOM3) in the settlement.

*Council's Initial Response*

**The support is welcomed for the inclusion of Whitemill as a Tier 4 settlement, and the site's potential development under policy HOM3 is noted.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3834 Mrs Ann Iorweth [5072]**

**Object**

*Summary:*

This is an objection to the inclusion of site SR/160/003 from the development limits. The reasons for the exclusion of the site is mainly on the grounds that trees adjacent to the main road are an integral feature of the landscape.

In developing the land it is intended to retain the majority of the healthy trees, so retaining their visual and environmental impact and also screening any development that might be allowed.

Access to the site would be gained via the existing lane and building of a small family unit confined to the area beyond the copse of mixed trees on the roadside frontage.

The plot is not in open countryside but adjoins an existing dwelling recently extended in size and opposite established houses on the opposite side of the road. There is housing development along both sides of the main road.

*Council's Initial Response*

**Agree to include within the development limits, small scale development would have to comply with the policies and provisions of the Plan.**

*Action*

**Agreed, amend development limits in Waungilwen to include site AS/160/003.**

*Representation(s)*

**3095 Mandy Jones [4160]**

**Object**

*Summary:*

The representation refers to an intention to build a house / bungalow adjoining flat for a person with learning disabilities and cerebral palsy on a plot adjoining to Pantyffynon rugby pitch. The site reference is AS/004/042

*Council's Initial Response*

**The inclusion of the site would lead to and illogical extension to the development limits and result in a sporadic development in the open countryside**

*Action*

**No change to Plan**

*Representation(s)*

**3220 D Bowler [5092]**

**Object**

**Agent: Asbri Planning Ltd (Mr Keith Warren) [592]**

*Summary:*

In summary, the changes proposed relate to a minor extension of the proposed development limits of Horeb in order to accommodate a modest form of development, i.e. 4 detached dwellings. This will not therefore go to the heart of the plan or have a bearing on the soundness of the Plan as a whole. Policy SD1 is objected to on the basis that the development limits of Five Roads/Horeb should be extended to include the site. The proposals Map is also objected to on these grounds. A Flood Assessment Report is submitted which demonstrates that appropriate measures can achieve betterment for the wider area in terms of flood risk and ecology.

This is an objection to the non-inclusion of candidate site SR/061/002 from the LDP, and seeks its inclusion under Policy SD1 (indicative 4 detached dwellings). Note the original candidate site proposal was for a development of 6 dwellings, however it is the same site area, therefore the site reference is AS/061/002 (candidate site was reference was SR/061/002).

*Council's Initial Response*

**Reference is made to the initial assessment of the site (seeking of a housing allocation) - the outcome of which is available in the sites assessment table.**

**This representation is different as it seeks the amendment of the development limits (small scale residential development) and not an allocation. It therefore needs a further assessment in accordance with the site assessment methodology.**

**This further assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The site does not accord with Stage 2a of the Site Assessment Methodology for the following reason : the site cannot accommodate 5 or more dwellings.**

**In terms of the request to include the site within the development limits, there is concern that this will lead to a detrimental impact on the character and setting of the settlement or its features.**

**The outcomes of the Council's stage 1 SFCA are noted, whilst the site also has many ecological considerations. Reference is made to Sections 6 and 7 of the Environment Act (Wales) 2016 in this regard.**

**Reference can be made to the Council's responses to representation reference numbers 3221 (site Suv23/h2) and 3222 (Suv23/h1) which can be found under the Council's responses to comments made under policy HOM1 - Housing Allocations.**

*Action*

**No change to the Plan.**





*Representation(s)*

**3982 Arwel Davies [3881]**

**Object**

**Agent: Cwm Planning & Design (Chris Morgan) [5113]**

*Summary:*

The respondent objects to the exclusion of site SR/021/022 from the development limits of Carmarthen, and cites a number of reasons in support of the site's potential for development.

*Council's Initial Response*

**The land has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the land. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3997 Mrs Lynn C C C Bushin [4817]**

**Object**

*Summary:*

I object to the above site (SR/124/008) not being included in the deposit LDP. The proposed site for inclusion DOES have Sewage connections, although the wrong tick box to Q23 was ticked by the applicant at the initial application stage saying "no" connection to sewerage. The reasons for the inclusion of the site are as follows:

- \* it is an infill site.
- \* The need for sites for one dwelling in the community has not been considered
- \* The need for a site for housing to allow the continuation of farming at this location has also not been considered.
- \* The agricultural classification of the land, this is incorrect, this is general agricultural land just like that of adjacent site SR/124/001.
- \* This site is within the village and should be included alongside sites SR/124/001 & SR/124/002 as it has equitable merits.
- \* This site is as close in distance to the village amenities, and there is a safe route for walking into the village that can be used and footpaths. One other site that has been included SR/124/002 has only one route to these facilities that can be used and that is along the side of the busy B4459 road.
- \* There is a precedent for housing being built on a small scale in the immediate vicinity.

*Council's Initial Response*

**The land has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the land. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence. There is sufficient and more suitable land available for residential development within the town/village to accommodate its housing needs.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3605 David Richard Barrie Evans [2712]**

**Object**

**Agent: Nicole Jones (Nicole Jones) [704]**

*Summary:*

Objection to the development limits of Pentrepoeth, with the proposed amendment to the development limits to include a new site.

There is an existing access to the west onto a main road through Pentrepoeth

All services: mains water supply, foul sewer, electricity and high-speed electronic communications networks, are about 50m away and can be moved easily onto the site.

This candidate site lies just outside the settlement limits of Idole/Pentrepoeth as defined in the local UDP. It is surrounded by residential development.

The nearest town, Carmarthen is in close proximity and has all necessary amenities, and the transport links to Carmarthen and Llanelli town are well established and developed.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3343 LR HM & IR Lewis [4945]**

**Object**

**Agent: Asbri Planning Ltd (Mr Keith Warren) [592]**

*Summary:*

Land at Dolau Fields/N of Dan y Crug, Llandovery SeC5/h1 (also E/26681 and E/37525):

Policy SD1: Development Limits is objected to on the basis that the development limits should be extended to reflect the extant planning permission.

The Proposals Map is also objected to on these grounds.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4394 Mr and Mrs Rees [5051]**

**Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Objection to the exclusion of a site from the development limits for Pontantwn.

We would highlight that our Clients land represents an opportunity for new housing development and being well related to the existing form of Pontantwn, it would represent a logical rounding-off opportunity (as supported by Policy HOM3) in the settlement.

Pontantwn is located at a sustainable location with good access to nearby larger settlements that contain a wide range of local services and community facilities. It is also positioned on a public highway that is served by a regular service, giving it good access to further settlements of the County and their associated facilities and services.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table.**

**Pontantwn has been defined as a Tier 4 settlement, and therefore the village does not have development limits. Any proposal will be considered against the policies set out within Policy HOM3 of the revised LDP.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3488 Mr Edmund Williams [3317]**

**Object**

*Summary:*

Objection to the development limits in Salem under policy SD1

My objection is specific to one area of the proposed expansion plan, which is for the road named Golwg-y-Gaer, in Salem. The plan proposes that the outer limit for development in the village is extended further along this road to encompass a planning application which has been previously lodged. There is currently a stable building on the land in question and an application has been submitted, more than once, to demolish this and instead build (at least one) dwelling.

*Council's Initial Response*

**Whilst Salem is considered too small to warrant a residential allocation, it is nevertheless deemed necessary that the settlement should be afforded with small scale opportunities for residential opportunities through white land within development limits. The objection site is one area that the Council considers would be appropriate for such uses.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3511 Mrs Fredena Burns [4646]**

**Object**

**Agent: Nicole Jones (Nicole Jones) [704]**

*Summary:*

Objection, seeking proposed new housing site at Capel Dewi, Carmarthen under policy SD1. We would like to include a field next to Capel Dewi Ucahf Farm in the new Local Development Plan. This parcel of land has got a long planning history. It is located 200 m of the Capel Dewi village on its eastern side amongst a spread of more recent individual housing and is a site identified in the UDP - ref ALT/021/001/N.

Capel Dewi is a village which has lost its local amenities. However various necessities are in close proximity, and the transport links to Carmarthen, Cross Hands and Llandeil are well established and developed.

*Council's Initial Response*

**The site is close to a cluster of dwellings that is considered to be an outlier to Capel Dewi, spatially detached from the main built form of the settlement. The site's inclusion within development limits would lead to an unnecessary encroachment into the countryside. Furthermore, there is sufficient residential land allocated within Capel Dewi.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3587 Mr Tony Jones [4064]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Objection to the exclusion of part of site SR/117/005 from the development limits of Nantgaredig.

The land is set within a roadside frontage of established number of dwellings and would appear as an infill plot immediately alongside the remainder of the settlement. There are no "topographic issues" preventing its inclusion.

The site is within walking distance to the range of community facilities and local services the settlement has to offer, such as a Primary School, public house and Medical Surgery, as well as well serviced bus stops that provide access to those services and facilities in the wider growth area of Carmarthen, which is only some 10 minutes' drive via the A40 road.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**It should be noted that part of the site is included within the development limits and would represent an appropriate rounding off opportunity.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3896 Mrs E Goodwin-Jones [5083]**

**Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Objection to the exclusion of candidate site SR/056/001 from Felingwm Isaf under Policy SD1.

Felingwm Isaf is located at a sustainable location with good access to nearby larger settlements that contain a wide range of local services and community facilities. It is also positioned on a public highway that is served by a regular service, giving it good access to further settlements of the County and their associated facilities and services.

In addition to the above, we would highlight that our Clients land (site SR/056/001)represents an opportunity for new housing development and being encapsulated by existing development on three sides would represent a logical infill opportunity.

*Council's Initial Response*

**Felingwm Isaf has been classified as a settlement within Tier 4 of the settlement hierarchy and therefore any site proposal will be considered under policies set out within the revised LDP, most notably Policy HOM3.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4082 Mr Owen Williams [3158]**

**Object**

*Summary:*

Objection to the inclusion of candidate site ref SR/147/002 within development limits, and should be restricted to its former outline that did not include the aforementioned site for this part of Golwg y Gaer.

*Council's Initial Response*

**Whilst Salem is considered to small to warrant a residential allocation, it is nevertheless deemed necessary that the settlement should be afforded with small scale opportunities for residential opportunities through white land within development limits. The objection site is one area that the Council considers would be appropriate for such uses.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4112 Mr Trevor Davies and Sons [5145]**

**Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Objection to the exclusion of candidate site SR/103/001 under Policy SD1.

The site represents an opportunity for new housing development and being well related to the existing form of the village, it would represent a logical round-off opportunity.

The village of Llansawrn in which the site is situated is located at a sustainable location and benefits from a number of community facilities and local services. It also has good access to nearby larger settlements that contain a wide range of local services and community facilities.

*Council's Initial Response*

**Llansawrn has been classified as a settlement within Tier 4 of the settlement hierarchy and therefore any site proposal will be considered under policies set out within the revised LDP, most notably Policy HOM3.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4373 Mr Richard Jones [2906]**

**Object**

*Summary:*

Objection to the exclusion of a site within the development limits for Crugybar.

The land in question is part owned by myself and Teilo Developments, with a land exchange arrangement agreed between both parties. This will enable two building plots to be developed on Site B. Plot 4 has already been granted full planning permission subject to S106 Agreement. Plot 3 has been submitted for outline planning permission on the 7 /1/20 and the outcome is pending. It is proposed to enter into S106 Agreements on both plots and that development will take place during 2020.

Our concerns are centred around the LDP limit for the Revised LDP conflicts with the current LDP and the development proposals for plots 3 and 4.

*Council's Initial Response*

**Crugybar has been classified as a settlement within Tier 4 of the settlement hierarchy and therefore any site proposal will be considered under policies set out within the revised LDP, most notably Policy HOM3.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4398 mr vaughan roberts [2307]**

**Object**

*Summary:*

Objection to the exclusion of SR/052/001 under Policy SD1 and a supporting statement is provided.

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*Council's Initial Response*

**Dryslwyn has been classified as a settlement within Tier 4 of the settlement hierarchy and therefore any site proposal will be considered under policies set out within the revised LDP, most notably Policy HOM3.**

*Action*

**No change to the Plan.**

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*Representation(s)*

**4565 Gareth Smith [2599]**

**Object**

*Summary:*

Objection to the exclusion of candidate site SR/064/001 (CA00330) from the settlement of Glanamman under policy SD1.

I would like the planning office to consider the site based on THREE reasons.

1.Practicalities for the owner who keeps animals on the site:

The site is located a number of miles from the owner's home. The owner works long hours and is unable to get to the site on daily basis

2.Previous building on the SITE:

The bottom part of the upper field had been used as a weigh bridge by a local colliery in the past and did have buildings on it.

3.Emotional/health well-being of the owner of the site.

**4566 Linda Smith [5212]**

**Object**

*Summary:*

Objection to the exclusion of candidate site SR/064/001 (CA00330) from the settlement of Glanamman under policy SD1.

I would like the planning office to consider the site based on THREE reasons.

1.Practicalities for the owner who keeps animals on the site:

The site is located a number of miles from the owner's home. The owner works long hours and is unable to get to the site on daily basis

2.Previous building on the SITE:

The bottom part of the upper field had been used as a weigh bridge by a local colliery in the past and did have buildings on it.

3.Emotional/health well-being of the owner of the site.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**Whilst it is acknowledged that the respondents are only seeking one dwelling, (hence the objection to Policy SD1 rather than Policy HOM1), the site area is quite sizeable and could potentially accommodate over 5 dwellings. Including this site within the plan would constitute an illogical extension to the development limits of the settlement.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3673 JEM & EJ Hughes [5038]**

**Object**

**Agent: Aled Thomas Planning Design Ltd (Mr Aled Thomas) [3225]**

*Summary:*

Seeks the inclusion of SR/054/002 within the LDP.

*Council's Initial Response*

**Felindre (Llangadog) has been classified as a settlement within Tier 4 of the settlement hierarchy and therefore any site proposal will be considered under policies set out within the revised LDP, most notably Policy HOM3.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3774 Mrs S Matthews [5055]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Objection to the exclusion of part of candidate site ref SR/064/004 under policy SD1.

We do not object to the inclusion of part of the site within the development limits, but strongly disagree with the rationale given for the exclusion of the remainder. We consider its exclusion to be an erroneous decision by the Authority, as well as being an inconsistent approach taken by it in the assessment of such sites.

The site is within walking distance to the range of community facilities and local services the adjoining settlement has to offer, as well as well serviced bus stops that provide access to those services and facilities in the wider growth area.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table (site ref: SR/064/004). The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3904 Mr & Mrs Conner [481]**

**Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Objection to the exclusion of a new site within the development limits of Brechfa.

The site represents a clear part of the built-up area and so its inclusion within the defined development limits of the settlement is both reasonable and logical. Furthermore, the site would then provide an opportunity to accommodate an additional residential dwelling that would not result in a form of overdevelopment, an instance of ribboning, nor would it result in a detriment to any ecological, highway safety, flooding, contamination or amenity related interest.

*Council's Initial Response*

**Inclusion of the site would constitute an illogical extension of the development limits to incorporate a small group of dwellings that are physically detached from the existing built form of Brechfa.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4083 Mr Owen Williams [3158]**

**Object**

*Summary:*

Objection to the inclusion of candidate site ref SR/147/004 within development limits, and should be restricted to its former outline that did not include the aforementioned site for this part of Golwg y Gaer.

*Council's Initial Response*

**Whilst Salem is considered to small to warrant a residential allocation, it is nevertheless deemed necessary that the settlement should be afforded with small scale opportunities for residential opportunities through white land within development limits. The objection site is one area that the Council considers would be appropriate for such uses.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4066 Mr Richard Jones [2906]**

**Object**

*Summary:*

Objection to the exclusion of a site from the development limits for Llanfynydd.

Seeking the inclusion of a site within the development limits for Llanfynydd. The site in question is an amended (reduced) area to that submitted as a candidate site (SR/089/002; CA0614) in 2018. The site will address the housing need within this community and the frontage development is aligned to other candidate sites within the village.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table (site ref: SR/089/002). The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**It should be noted the area covered by this objection site included candidate sites SR/089/001 and SR/089/002. Site SR/089/001 has been included within the revised development limits for Llanfynydd.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4572 Mr Brian Birch [5297]**

**Object**

**Agent: Asbri Planning Ltd (Mr Keith Warren) [592]**

*Summary:*

Objection to Policy SD1 - on the grounds that the site should be included in development limits.

The site has benefitted from previous planning permissions and as part of an allocation in the former Unitary Development Plan. However the number of units has been reduced to 11 in order to address flood risk issues associated with land to the south. The site area has also been reduced accordingly.

A layout drawing has been prepared which shows a scheme along the frontage of Tan-Y-Gelli which links existing development to the west and east and rounds off the settlement pattern at this location.

A Sustainability Assessment (SA) is provided which shows that the development of the site would meet the LDP SA objectives.

*Council's Initial Response*

**Sufficient residential opportunities exist within the settlement.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4459 Mr Thomas Marr [5235]**

**Object**

*Summary:*

Objection to the exclusion of a site from the development limits of Brynamman under Policy SD1.

There are existing residential developments that fall outside of the boundary of the LDP therefore the proposed site allocation would have little visual impact on the surrounding area. The new site allocation falls within the inner boundary of the village of Brynamman. There is existing outline planning permission for development (SeC9/h1) which is set back off Mountain Road an equal distance (behind existing houses) to the proposed site allocation.

*Council's Initial Response*

**This site is separated and detached from the current built form of Mountain Road, Brynamman. It's inclusion would constitute an illogical extension of the development limits.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4490 A New [5211]**

**Object**

*Summary:*

Objection to the exclusion of development limits around the settlement of Cynghordy (and in particular the site covered by planning application E/39932). The site covered by planning application E/39932 forms part of housing allocation SC28/h1 in the current LDP. We were seeking to secure planning on part of that site for a single storey dwelling and had hoped to do so before the expiry of the current Plan in 2021. However, in the context of the current pandemic, this will now not happen. We therefore request that it be included in the Revised LDP.

*Council's Initial Response*

**Cynghordy has been classified as a settlement within Tier 4 of the settlement hierarchy and therefore any site proposal will be considered under policies set out within the revised LDP, most notably Policy HOM3.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4541 Mrs A Davies [5286]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

The inclusion of this site within new development limits for this part of Capel Dewi would reflect similar such 'outliers' elsewhere in Carmarthenshire.

The site's inclusion would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type.

It's development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

In addition, residential development at this location:-

- would not be detrimental to the amenity of adjacent properties;
- would satisfy recognised housing and sustainability objectives;
- would not have a detrimental impact on the landscape or nature conservation interests.

Furthermore, the site is not impeded by any access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints and its delivery, if allocated, is assured.

*Council's Initial Response*

**The site lies adjacent to a cluster of dwellings that is considered to be an outlier to Capel Dewi, spatially detached from the main built form of the settlement. The site's inclusion within development limits would lead to an unnecessary encroachment into the countryside. Furthermore, there is sufficient residential land allocated within Capel Dewi.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4500 Mr & Mrs A & G Lewis [5265]**

**Object**

*Summary:*

We propose this allocation for 1 residential dwelling, as an infill development in the village of Llanllwni. The site is within easy walking distance to community amenities, such as the local Village Shop, Pub and Primary School. It is also close to a significant employment site, the T L Thomas & Son, Builders Merchants and Teifi Timber. It is within walking distance of the Aberystwyth - Carmarthen bus route with services operating every hour. We believe it is a modest development in keeping with the existing dwellings within the cluster.

*Council's Initial Response*

**Agree to the inclusion of site AS/099/010. It is considered acceptable to include the site within the development limits to allow the flexibility for potential future small scale infill development within Llanllwni.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3435 Mr P Flinders [3993]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Milo should be recategorised and given development limits. Having considered the settlement framework's proposed tiers, it is felt that Milo has been incorrectly categorised as a 'Tier 4 Rural Village'. Milo has regular bus services, linking the village with nearby Llandeilo, Llandybie and Ammanford, providing convenient access to a wide range of services and facilities, as well as further bus and rail services to Llanelli and Swansea. The sustainable development credentials of Milo should therefore be given full recognition and consideration when determining potential future growth options.

*Council's Initial Response*

**The approach as set out within policy SP16 Strategic Policy - SP16: Sustainable Distribution - Settlement Framework is considered sound. Whilst settlements such as Milo have no defined development limits, the diversity of the County is recognised with regard given to housing in rural areas, and the value such areas play within the County. Within rural villages (Tier 4) such as Milo, and non-defined settlements, new housing development will be limited to small scale opportunities. Reference is made to Policy HOM3 of this Plan where opportunities may exist for proponents of appropriate residential proposals in such areas.**

*Action*

**No change to the Plan.**

*Representation(s)*

4559 A, C & M Thomas, Davies & Davies [3243] Object

**Agent: ArchiSurv Ltd (Mr Alan Thomas) [5295]**

*Summary:*

The land is sought for inclusion as a housing allocation in the LDP. The area has been fenced off and grass cut for over 15 years and does not mean loss of agricultural land. The area is immediately adjoining and directly opposite existing dwellings. The potential is for three dwellings (one is included in the proposed local plan but we feel the whole area should be included). A detailed supporting statement is provided with the representation.

*Council's Initial Response*

**Part of the site has been included within the development limits in order to allow the flexibility for potential future small scale infill development within the village. The land has been duly considered in the formulation and preparation of the LDP with the reasons for its non- inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the land. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence. As part of this assessment process a detailed site pro forma has been prepared. There is sufficient and more suitable land available for residential development within the town/village to accommodate its housing needs. Part of the site also lies within the C2 flood risk area.**

*Action*

**No change to the Plan.**

*Representation(s)*

3684 Mrs Fay Hancock [2616] Object

*Summary:*

Object to policy SD1 and seeks the inclusion of candidate site SR/132/001 within the development limits -

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3686 West Wales Developments Ltd (Nigel & Jane Evans) [859] Object**

*Summary:*

Object to the non-inclusion of candidate site SR/149/001 in the LDP, and provides a supporting statement for its inclusion.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan**

*Representation(s)*

**3940 Pegasus Group (Daniel Millward) [5095] Object**

*Summary:*

Objection to Policy SD1 - Development Limits.

The policy does not set out a scenario whereby development for traditional housing can come forward beyond the development limits. This will be problematic in circumstances where the Council's housing delivery fails to keep pace with their proposed annual requirement.

As such, we consider that this policy should incorporate wording to allow for development in sustainable locations that would otherwise comply with the relevant policies of the Development Plan in the event that the supply and delivery of housing failed to keep pace with the Local Plan Housing Requirement (i.e. the absence of a five-year supply of housing land.

*Council's Initial Response*

**Disagree. The Plan provides certainty and clarity on the location of new development in accordance with the provisions of national policy. In addition, the plan makes sufficient provision for the delivery of new homes across the county, and throughout the plan period.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3691 West Wales Developments Ltd (Nigel & Jane Evans) [859] Object**

*Summary:*

Object to the non-inclusion of candidate site SR/132/001 under policy SD1, and provide a supporting statement for its inclusion.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3742 J & S Lewis & Price [5049] Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Objection to the omission of candidate site SR/159/011 under policy SD1:

The Site lies immediately adjacent to the settlement of Tycroes by virtue of it being located on a prominent A road, and immediately alongside existing residential development at Pontardulais Road. As a result, its inclusion within a cluster of the defined Development Limits of this part of the settlement would represent a reasonable and logical form of rounding off. Furthermore, through this change to the Limits, the Site would then provide an opportunity to accommodate three detached residential dwellings at this location.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4128 Seasons Holidays plc ( \_ \_ \_ ) [5149] Object**

**Agent: Lichfields (Mr Owain Nedin) [4937]**

*Summary:*

Proposal to extend the Development Limits boundary of Laugharne to include the existing Laugharne Park Estate.

*Council's Initial Response*

**Disagree. The inclusion of the whole estate of the existing Laugharne Park Estate within the development limits would be unreasonable within the context of the development Plan. The policy framework within the revised LDP provides sufficient flexibility for the consideration of any tourism and leisure related activities / developments.**

*Action*

**No change to the Plan**

*Representation(s)*

**3830 Mr & Mrs M Lloyd [3939] Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Object to Policy SD1 and seeks the inclusion of part of SR/004/019. \the representation identifies a number of points which can be overcome including flood risk and impact on TPOs.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence**

*Action*

**No change to the Plan**

*Representation(s)*

**4419 Mr Martin Ingram [3506]**

**Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

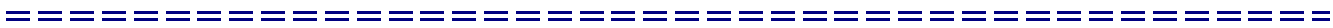
In support of HOM3 and SP16, candidate site SR/130/001 represents one such opportunity for new housing development and being well related to the existing form of the village, it would represent a logical round-off opportunity.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan**



*Representation(s)*

**3861 Maralyn Treharne [3888]**

**Object**

*Summary:*

Objection to the removal development limits in Broad Oak under policy SD1:

I consider the removal of Development Limits from the revised plan to be unsound and lacking in good judgement. The existence of Development Limits hitherto have served as a base line of constraint to inhibit inappropriate rural development.

It can be anticipated that removal of Development Limits will inevitably lead to the sale of prime agricultural land for development, to the detriment and well being of those living in the smallest of rural communities.

*Council's Initial Response*

**In terms of the removal of development limits from many of the smaller settlements, the approach as set out within policy SP16 Strategic Policy - SP16: Sustainable Distribution - Settlement Framework is considered sound. The diversity of the County is recognised with regard given to housing in rural areas, and the value such areas play within the County. Within rural villages (Tier 4), and non-defined settlements, new housing development will be limited to small scale opportunities. Reference is made to Policy HOM3 of this Plan where opportunities may exist for proponents of appropriate residential proposals in such areas.**

**In regard to the respondent's contention that the removal of development limits will lead to the sale of prime agricultural land for development, Policy HOM3 would only permit small scale development (1-4 dwellings) in appropriate locations, such as minor infill opportunities within the existing built form, or logical extensions and/or rounding off of the development pattern that fits in with the character of the village form.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4532 Mr P Flinders [3993]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

The site's inclusion within reinstated development limits for Milo would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type.

Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

In addition, residential development at this location:-

- \* would not be detrimental to the amenity of adjacent properties;
- \* would satisfy recognised housing and sustainability objectives;
- \* would not have a detrimental impact on the landscape or nature conservation interests.

Furthermore, the site is not impeded by any access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints and its delivery, if allocated, is assured.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**Milo has been classified as a settlement within Tier 4 of the settlement hierarchy and therefore any site proposal will be considered under policies set out within the revised LDP, most notably Policy HOM3.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4396 Mr Eirian Emanuel [610]**

**Object**

*Summary:*

Objection to the exclusion of candidate site SR/138/003 under Policy SD1 and a supporting statement is provided.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4399 Eamon Barry Flaherty [841]**

**Object**

*Summary:*

Objection to the non inclusion of candidate site SR/049/018 from the Deposit LDP under Policy SD1 Development Limits. A supporting statement is provided.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4404 Mr Dylan Rees [3688]**

**Object**

**Agent: Robert Higgins Architect (Mr Robert Higgins) [5151]**

*Summary:*

Objection to SD1 - seeks inclusion of SR/082/009 within the Revised LDP

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4538 Ms L Rooke [846]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

The site's inclusion within development limits for Heol Ddu would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type.

Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

In addition, residential development at this location:-

- \* would not be detrimental to the amenity of adjacent properties;
- \* would satisfy recognised housing and sustainability objectives;
- \* would not have a detrimental impact on the landscape or nature conservation interests.

Furthermore, the site is not impeded by any access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints and its delivery, if allocated, is assured.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**Heol Ddu has been classified as a settlement within Tier 4 of the settlement hierarchy and therefore any site proposal will be considered under policies set out within the revised LDP, most notably Policy HOM3.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4136 Mr A Pritchard [5153] Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Summary needed

object against SD1 for omission SR/082/006  
No SA provided - however Rachel I don't think they are proposing an allocation anyway

**4140 J W K Davies [852] Object**

*Summary:*

Seek the inclusion of candidate site reference SR/004/006 within the Plan, and a supporting statement is provided.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4114 Mr G Lewis [5058]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Objection to the exclusion of candidate site SR/009/004 under Policy SD1.

The Site lies immediately adjoining the settlement of Caerbryn by virtue of it being immediately adjoining by existing residential development about the minor road off Penygroes Road. As a result, its inclusion within the Development Limits of the settlement would represent a reasonable and logical form of infilling, upon a residential curtilage.

The development of the Site for the purposes of one, three-bedroomed bungalow, can be undertaken in a manner that would not result in a form of overdevelopment, an instance of ribboning, nor would it result in a detriment to any ecological, highway safety, flooding, contamination or amenity related interest.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



*Representation(s)*

**4093 Mr & Mrs Henry [3677]**

**Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Objection to the exclusion of candidate site SR/054/001 under Policy SD1.

The site represents an opportunity for new housing development and being well related to the existing form of the village, it would represent a logical extension opportunity.

The village itself is located at a sustainable location with good access to a nearby larger settlement that contains a wide range of local services and community facilities. Access to this settlement is possible by non-motorised means and the village is also positioned on a regular bus service route, giving it good access to further settlements of the County and their associated facilities and services.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4084 Mrs Veronica Thomas [624]**

**Object**

*Summary:*

Objects to the non-inclusion of candidate site SR/149/003 from the revised LDP under policy SD1, and provides a supporting statement relating to its requested inclusion.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4005 Mr Clive Douch [2924]**

**Object**

**Agent: Nicole Jones (Nicole Jones) [704]**

*Summary:*

Objection to the exclusion of candidate site SR/138/004 under Policy SD1.

This site has been used for many years as part of the garden of the existing dwelling. It is tucked behind the existing farm house. New dwellings would be designed with the surrounding residential houses in mind.

This candidate site lies outside the settlement limits of Pontyberem as defined in the adopted LDP, but it is surrounded by residential development.

Pontyberem is a small town which has got all necessary amenities in close proximity.

The transport links to Carmarthen and Llanelli town are well established and developed.

The site is not constrained by any significant environmental considerations, including ecological designations.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3976 Dolawen Cyf (Owain Jones) [3841]**

**Object**

**Agent: Asbri Planning Ltd (Mr Keith Warren) [592]**

*Summary:*

Objection to Policy SD1 seeking inclusion of new site within limits.

The site comprises candidate site SR/009/003 with additional land adjoining its northern boundary.

The site is well related to the existing settlement pattern, and its development will not result in any material harm in planning terms. Furthermore an agreement has been reached to provide a suitable access to the site.

There are no allocations proposed in the linked village of Caebryn/Blaenau.

This submission also seeks to demonstrate that the site is deliverable by a proven local building company and provisions would be incorporated which would seek to ensure a high quality of design and layout.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3944 Mrs V, Mrs A, Mr E, Mr & Mrs J. Davies, Davies, Davies & Davies [5096] Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Objection to the exclusion of part of candidate site SR/082/002 from development limits.

The Full Representation has sought to examine the Council's reasons for non-inclusion of th Candidate Site. It has successfully addressed a technical issue, being that new residents will be able to access the A483 Ammanford Road via Aberlash Road where the NRW are shortly to embark upon a series of flood prevention measures. The site itself nevertheless remains flood-free.

Our clients have presented their indicative proposals to promote a frontage development of only TWO additional dwelling houses. The revised proposals will be compatible with existing and proposed development along both flanks of Waunfarlais Road, and thus ensuring that future development respects the character and setting of the locality.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table. The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3778 Mr WD & GI Owens [395]**

**Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Objection to Policy SD1 and seeking the inclusion of part of the previous candidate site SR/100/007.

Our clients have decided to revise their proposals to seek inclusion of half the road frontage along Heol-y-Plas from that which was originally submitted as a Candidate Site back in 2018.

The site in question lies at a highly sustainable position along the A road, which would allow new residents to continue to access the excellent community facilities in the locality, such as the nearby Primary School, public houses and main bus route along Heol-y-Plas providing passengers access between Cross Hands and Llanelli.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table (SR/100/007). The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**Whilst it is acknowledged that this is a smaller site than the original submission (SR/100/007), the reason for the site's exclusion remains relevant. Furthermore, there is sufficient and more suitable land available for development within the settlement to accommodate its housing need.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4422 Mr Ian Leter [5181]**

**Object**

*Summary:*

While reviewing the proposed development map I noted that the proposed development line appears to be incorrect because it takes no account of the Full Planning Permission S/33776 which was Granted in Full on 22nd June 2016

I would be very grateful if the boundary limits line could be corrected to take account of the permission already granted (Grid Reference 254814 211742)

*Council's Initial Response*

**Disagree. Development limits to remain in line with the existing urban form on Bethania Road. This non-change does not prejudice any future domestic development at the site.**

*Action*

**No change to the Plan.**

**Representation(s)**

**4424 Mr and Mrs Carwyn and Esme Lloyd [5215] Object**

**Summary:**

Would like Carmarthenshire County Council to consider and adjustment to the development limits, to include the part of the garden of the dwelling know as Minynant.

**Council's Initial Response**

**Agree. Amendment to the development limits to include the garden area.**

**Action**

**Change to the Plan.**

**Representation(s)**

**3821 Mr L W Jones [5066] Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

**Summary:**

Seeks inclusion of area of land comprising new candidate site SR/159/018 and provides a supporting statement to promote the sites in inclusion with the development limits.

**Council's Initial Response**

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table (SR/159/013). The representation raises no additional information to justify inclusion of the suggested new site. The assessment of sites was undertaken in accordance with national guidance and the site assessment methodology and background/topic papers and the supporting evidence.**

**Action**

**No change to the Plan.**

**Representation(s)**

**3410 Mr J Quick [4973] Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

**Summary:**

Our client owns a parcel of land adjoining St. Mark's Church and is seeking the inclusion of the land within the defined development limits of Caerbryn. The site is within walking distance to the range of community facilities and local services the settlement has to offer, as well as well serviced bus stops that provide access to those services and facilities in the wider growth areas of Cross Hands and Ammanford, which is only some 10 minutes by road.

**Council's Initial Response**

**The site does not accord with Stage 2 (Phase 2b) of the Site Assessment Methodology in that the development would lead to an illogical extension and impact on the rural character of this part of the settlement.**

**Action**

**No change to the Plan.**

*Representation(s)*

**3895 T Richard Jones (Betws) Ltd (Owain Jones) [5084] Object**  
**Agent: Asbri Planning Ltd (Mr Keith Warren) [592]**

*Summary:*

Objection to the exclusion of site from development limits under Policy SD1.

The site represents the undeveloped part of a wider allocation - GA3/h9 in the adopted LDP, and benefits from reserved matters planning permission - E/24742, for 66 dwellings,. Furthermore a start has been made on site, following the discharge of pre-commencement conditions.

This submission seeks therefore objects to the Deposit Plan on the grounds that the site which represents the final phase of a mixed use residential and employment scheme on the former colliery site has an extant planning permission be included within development limits. TRJ Ltd would therefore respectfully request that Carmarthenshire County Council considers this representation with a view to making appropriate Focused Changes to the Plan prior to its formal submission to the Planning Inspectorate.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The respondent notes that the site has permission dating back to 2011 which is extant, this is not sufficient to warrant it's inclusion as a housing allocation as no evidence of deliverability has been supplied. Should the site be developed, it can be picked up within the windfall allowance.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3430 Mr T Anthony [4983] Object**  
**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

The inclusion of this site within the development limits for Ammanford would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type. Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

*Council's Initial Response*

**The site has been duly considered in the formulation and preparation of the LDP with the reasons for its non inclusion set out within the Site Assessment Table.**

**Heol Ddu has been defined as a Tier 4 settlement, and therefore the village does not have development limits. Any proposal will be considered against the policies set out within Policy HOM3 of the revised LDP.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3899 T Richard Jones (Betws) Ltd (Owain Jones) [5084] Object**  
**Agent: Asbri Planning Ltd (Mr Keith Warren) [592]**

*Summary:*

This submission objects to the Deposit Plan on the grounds that the site be included as a housing land allocation to reflect its status in the adopted LDP - GA3/h54, and the development limits (Policy SD1) should be amended to reflect this. The site has previously benefitted from a full planning permission - S/24072, for 10 bungalows, It is contained by existing residential uses and supported accommodation. The site should be allocated for 10 dwellings to reflect the previous planning permission and be identified accordingly on the Proposals Map. Supporting evidence is provided.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. The respondent notes that the site has in the past benefitted from planning permission in the past which has now lapsed. This is not sufficient to warrant it's inclusion as a housing allocation as no evidence of deliverability has been supplied. There is sufficient and more suitable land available for residential development within the town/village to accommodate its housing needs.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4545 Philip Grice Chairman (Phil Grice) [5288] Object**

*Summary:*

The Carmarthen Riverside Association wishes to object to the proposed changes set out in the LDP detailed in the 'Proposals map/Carmarthen inset map' regarding the development limits alongside the River Towy in the vicinity of the Quay, the Quay Centre and the area formerly known as Pot-house Wharf. In particular the development limits should be moved north, and be redefined away from the river at least to the far side of Coracle Way.

*Council's Initial Response*

**Disagree. The development limits at this location remain consistent with those in the current adopted Local Development Plan. Any development within the development limits will have to accord with the policies of the Plan.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3783 Cllr. A & D Vaughan Owen & Price [5057]**

**Object**

*Summary:*

Objection to the inclusion of open space within development limits in Drefach under Policy SD1.

The site in question is the football field on the site of the former Gwendraeth Comprehensive School. Whilst the field to the east of the school buildings has been placed outside development limits, the field in question, to the west, has not. We request that this field is removed from the development limits for Drefach.

*Council's Initial Response*

**Comments noted.**

*Action*

**The development limits around the two outdoor recreation areas within the settlement will be removed to reflect their location and position within the built form of Drefach and in the interests of consistency.**

*Representation(s)*

**4067 Mr Phil Mann [2574]**

**Object**

**Agent: Mr Stuart Owen [731]**

*Summary:*

We object to policy SD1 and seek an amendment to the development limits to include our site.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. There is sufficient and more suitable land available for residential development within the settlement to accommodate its housing need.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4547 Philip Grice Chairman (Phil Grice) [5288]**

**Object**

*Summary:*

The Quay's long-standing Conservation Area status, the settings of the listed Towy Works building and Carmarthen Castle should be respected by ensuring that any re-development proposals do not exceed the footprint of the existing buildings.

*Council's Initial Response*

**Development proposals will have to comply the policies of the Plan and legislation which will seek to protect Conservation Areas and Listed Buildings.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4070 Llannon Community Council (Ms Susan James) [5134] Object**

*Summary:*

Local residents are concerned about the fact that a piece of derelict land has been taken off the current LDP and believe it should be put back on for attention.

*Council's Initial Response*

**Site is a longstanding allocation with issues concerning lack of deliverability, hence its deallocation. Site will remain within limits.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4407 Mr & Mrs Hughes [5033] Object**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

In support of Manordeilo being a Tier 4 settlement, we would highlight that our Clients land represents one such opportunity for new housing development and would clearly be supported by the provision of Policy HOM3.

*Council's Initial Response*

**Comments noted.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4135 Mr E D Jones [5150] Object**

**Agent: Robert Higgins Architect (Mr Robert Higgins) [5151]**

*Summary:*

Wish to build a small residence for my daughter close to the farm, so that she can help with the running of the business.

*Council's Initial Response*

**Respondent has not supplied a plan of the proposed site. Therefore a fair judgement could not be made.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4403 E Thomas [5165]**

**Object**

*Summary:*

Objection to the exclusion of site in the development limits under policy SD1. Site AS/099/009.

*Council's Initial Response*

**This assessment of the site has been undertaken in accordance with national guidance and the Site Assessment Methodology and background/topic papers and the supporting evidence. There is sufficient and more suitable land available for residential development within the town/village to accommodate its housing needs. The site is detached from the main built up part of Llanllwni and would result in a fragmented development.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4558 Ms S McNeill [5293]**

**Object**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

Consequential amendment to development limit with objection to AS/067/020 which seeks the inclusion of the site under the housing allocation policy.

*Council's Initial Response*

**The inclusion of development limits and new development would result in a ribbon pattern of development contrary to general planning principles.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3735 Mrs M Williams [4087]**

**Support**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Wholeheartedly welcome the decision of the Authority to concur with the representation previously made in relation to our Clients land and fully support their decision to include the land within the development limits. They intend enacting upon this inclusion shortly after the LDP is formally adopted, by means of a formal planning application, and thereafter commence implementation of the development of the site within the early years of the Plan Period.

*Council's Initial Response*

**Support welcomed**

*Action*

**No change to the Plan**

*Representation(s)*

**3736 Mrs C Davies [5046] Support**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Wholeheartedly welcome the decision of the Authority to concur with the representation previously made in relation to our Clients land and fully support their decision to include the land within the development limits. They intend enacting upon this inclusion shortly after the LDP is formally adopted, by means of a formal planning application, and thereafter commence implementation of the development of the site within the early years of the Plan Period.

*Council's Initial Response*

**Support Welcomed**

*Action*

**No change to the Plan**

*Representation(s)*

**3483 Mrs Margaret Teal [4952] Support**

*Summary:*

Having attended the consultation session at St Clears, I was made aware that site SR/126/008 for Hotel Lodges has not been moved forward to the LDP for various reasons. I thank you for that decision.

**3480 Mrs Margaret Teal [4952] Support**

*Summary:*

Having attended the consultation session at St Clears, I was made aware that site SR/126/005 for residential use has not been moved forward to the LDP for various reasons. I thank you for that decision.

**3484 Mrs Margaret Teal [4952] Support**

*Summary:*

Having attended the consultation session at St Clears, I was made aware that site SR/126/009 for residential at Woodend has not been moved forward to the LDP for various reasons. I thank you for that decision.

**3482 Mrs Margaret Teal [4952] Support**

*Summary:*

Having attended the consultation session at St Clears, I was made aware that site SR/126/007 for Hotel Lodges, has not been moved forward to the LDP for various reasons. I thank you for that decision.

*Council's Initial Response*

**Support Welcomed**

*Action*

**No change to the Plan**

**Representation(s)****3552 Mr & Mrs R & AL Morgans [4110] Support****Agent: Evans Banks Planning Limited (Richard Banks) [4967]****Summary:**

Welcome the decision of the Authority to concur with the representation previously made in relation to our Clients land and fully support their decision to include the land within the development limits. They intend enacting upon this inclusion shortly after the LDP is formally adopted, by means of a formal planning application, and thereafter commence implementation of the development of the site within the early years of the Plan Period.

**Council's Initial Response**

**Support Welcomed. The change in development limits allows the potential for small scale development to take place, subject to the policies set out within the revised LDP.**

**Action**

**No change to the Plan**

=====

**Representation(s)****3079 Mrs Rhian Wynne Jones [2691] Support****Summary:**

The respondent strongly agrees with the exclusion of candidate site SR/159/005 for development and claims that the land was sold by the NCB for recreational use. The respondent also outlines biodiversity and infrastructural related concerns, whilst reference is also made to the site of Wernos which is claimed to remain an eyesore with building materials left and monies owed to the community remain unpaid. The respondent outlines strong concerns that the Welshness of the village is going to be eroded.

**3078 Mrs Rhian Wynne Jones [2691] Support****Summary:**

The respondent strongly agrees with the exclusion of candidate site SR/159/014 for development and claims that the land was sold by the NCB for recreational use. The respondent also outlines biodiversity and infrastructural related concerns, whilst reference is also made to the site of Wernos which is claimed to remain an eyesore with building materials left and monies owed to the community remain unpaid. The respondent outlines strong concerns that the Welshness of the village is going to be eroded.

**Council's Initial Response**

**Support Welcome**

**Action**

**No action to be taken**

=====

*Representation(s)*

**3114 Mr Dennis Alexander [3310]**

**Support**

*Summary:*

Land between Heol Hafod Road & Heol Brown should be entirely outside the development area and should remain as recreation land. Therefore, Policy SD1 is supported due to the fact that this land is located outside the development limits in the deposit Plan. (when doing officer response refer to rep 3608 - delete this from summary then)

*Council's Initial Response*

**Support welcomed**

*Action*

**No action to be taken**

*Representation(s)*

**3101 Mr S Cooper [4829]**

**Support**

*Summary:*

Referring to SA14 7NF, Church Road. The Development Plan appears Fundamentally Sound and I am supportive of it.

*Council's Initial Response*

**Support welcomed**

*Action*

**No action to be taken**

*Representation(s)*

**3812 Mr & Mrs M Lloyd [3939] Support**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Our clients wholeheartedly welcome the decision of the Authority to concur with the representation previously made in relation to our Clients land and fully support their decision to include the land (northern part of SR/004/019).

**3813 Ms M Davies [5062] Support**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Our clients wholeheartedly welcome the decision of the Authority to concur with the representation previously made in relation to our Clients land (site SR/026/002) and fully support their decision to include the land within the development limits. They intend enacting upon this inclusion shortly after the LDP is formally adopted, by means of a formal planning application, and thereafter commence implementation of the development of the site within the early years of the Plan Period.

Supports the inclusion of site SR/026/002 which forms part of site allocation PrC3/h8

**3815 Mr & Mrs P Morgan [4078] Support**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Our clients wholeheartedly welcome the decision of the Authority to concur with the representation previously made in relation to our Clients land and fully support their decision to include the land within the development limits. They intend enacting upon this inclusion shortly after the LDP is formally adopted, by means of a formal planning application, and thereafter commence implementation of the development of the site within the early years of the Plan Period.

*Council's Initial Response*

**Support welcomed**

*Action*

**No action to be taken**

*Representation(s)*

**3775 Mrs S Matthews [5055] Support**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Support for the inclusion of part of candidate site SR/064/004 under Policy SD1.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3847 Mr M Fyfield [3007]**

**Support**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Support for the inclusion of land within the development limits of Ystradowen under Policy SD1 Development Limits.

Our Client's made a formal Candidate Site Submission in August 2018, which was referenced SR/164/001, seeking the inclusion of their land within the development limits of Ystradowen as part of the Replacement Local Development Plan.

We therefore welcome the decision of the Authority to concur with the representation previously made in relation to our Client's land and fully support their decision to include the land within the development limits.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4038 Mrs D Evans [5130]**

**Support**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

With regards candidate site SR/064/003, following careful consideration of the Authority's response and discussion with our Client, we welcome the decision of the Authority to concur in part with the representation previously made in relation to our Client's land and fully support their decision to include the above land within the development limits. Support for policy SD1 - part of candidate site included in development limits - site reference AS/064/023

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3835 Mrs H G Chambers [4006]**

**Support**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Wholeheartedly welcome the decision of the Authority to concur with the representation previously made in relation to our Clients land and fully support their decision to include the land within the development limits. They intend enacting upon this inclusion shortly after the LDP is formally adopted, by means of a formal planning application, and thereafter commence implementation of the development of the site within the early years of the Plan Period.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3406 Ms Sally Bere [3602]**

**Support**

*Summary:*

I would like to strongly SUPPORT the development limits as defined in the Deposit LDP as they relate to Cwmoernant, Carmarthen BUT only where they tightly co-incide with the garden/ property boundaries along Springfield Road & Cwmoernant.

*Council's Initial Response*

**Support is welcomed.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3590 Mr David James [4568]**

**Support**

*Summary:*

Support for the exclusion of site SR/021/051 from the development limits of Carmarthen.

Since the site was previously rejected there has been no material change in any of the circumstances affecting this site with no new additional information or reasoning to justify the site's inclusion in the revised LDP.

The hamlet of Ffynnonddrain has settlement limits which are defined by logical and established features in the landscape. I consider that the inclusion of this site would constitute an incursion into the open countryside which would constitute unacceptable ribbon development.

The site is not accessible from the public highway nor does it have a suitable access point with adequate visibility with which to achieve accessibility.

The proposal would adversely impact on nearby built development and cannot be considered to accord with sustainable development.

**3417 Mr Sean Maslin [725]**

**Support**

*Summary:*

Support the exclusion of site SR/021/051.

There has been no material change in circumstances affecting this previously rejected site. The current settlement limits of Ffynnon-ddrain are defined by logical and established features. The topography of the site is not favourable. The proposal does not accord with sustainable development. The site is not accessible from the public highway nor does it have a suitable access point with adequate visibility. The proposal would entail the loss of valuable residential amenity. There are no special circumstances to justify the inclusion of the proposed site in the revised LDP.

*Council's Initial Response*

**Support for the exclusion of the site is welcomed.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4496 Ms C Davies [5261] Support**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

*Summary:*

The inclusion of this site within the development limits for Trimsaran is welcomed.

The site's inclusion will not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type.

Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

In addition, residential development at this location:-

- \* would not be detrimental to the amenity of adjacent properties;
- \* would satisfy recognised housing and sustainability objectives;
- \* would not have a detrimental impact on the landscape or nature conservation interests.

Furthermore, the site is not impeded by any known access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints and its delivery, if allocated, is assured.

*Council's Initial Response*

**Support Welcomed.**

**The site is to be included to allow the flexibility for potential future development within a settlement with otherwise limited small scale growth potential. Any proposal will be considered against the policies set out within the revised LDP.**

*Action*

**No change to the Plan**

*Representation(s)*

**3823 Mr & Mrs J Evans [5068] Support**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Our clients support the inclusion of site SR/019/009 within the development limits of Capel Iwan.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3825 Mr & Mrs W.A. S & E.A.E Howell [4111]**

**Support**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Our clients supports the inclusion of site SR/129/004 within with development limits of Pentrecwrt.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3828 Mr H Owen [5070]**

**Support**

**Agent: Evans Banks Planning Limited (Richard Banks) [4967]**

*Summary:*

Our clients support the inclusion of SR/062/007 within the development limits.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**



**Representation(s)**

**4555 Mr & Mrs P Morgan [4078]**

**Support**

**Agent: JCR Planning Ltd (Mr Craig Jones) [4665]**

**Summary:**

The inclusion of this site within the development limits for Tycroes is welcomed. The site's inclusion will not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth, and allow for a wider choice of housing type.

Its development would be in keeping and in character with the settlement and will ensure a deliverable source of future housing for this sustainable community.

In addition, residential development at this location:-

- \* would not be detrimental to the amenity of adjacent properties;
- \* would satisfy recognised housing and sustainability objectives;
- \* would not have a detrimental impact on the landscape or nature conservation interests.

Furthermore, the site is not impeded by any known access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints and its delivery, if allocated, is assured.

**Council's Initial Response**

**Support Welcomed.**

**Action**

**No Change to the Plan.**

**Representation(s)**

**4511 Mr E W Cooper [5275]**

**Support**

**Summary:**

Seeking an extension to the development limits to accommodate a garage and recreational space at 77 Hendre Road, Capel Hendre, Ammanford, SA18 3LE

**Council's Initial Response**

**The site is already within the development limits of Tycroes.**

**Action**

**No change to the Plan.**

*Representation(s)*

**3911 Mr E Thomas [5090] Support**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

We welcome the decision of the Authority to concur with the representation previously made in relation to our Client's land (SR/004/007) and fully support their decision to include the land within the development limits.

*Council's Initial Response*

**Support is welcomed.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3194 Mr Wyn Humphreys [4580] Support**

*Summary:*

I wish to support the exclusion of site SR/162/002, Land adjacent to Maesawelon, Whitemill from the development limits

The siting of the development is particularly ill-considered

A development of any size would represent an outward extension of built development into open countryside resulting in a visual intrusion into the countryside and a coalescence of settlements to the detriment of the appearance and character of the area.

The development doesn't fit in with the character of the village form and landscape, it cannot be classified as a logical extension or rounding of the development due to location and nature of surroundings.

*Council's Initial Response*

**Support is welcomed.**

*Action*

**No change to the Plan.**

*Representation(s)*

**4078 Ms and Mr L & E Edwards [5103] Support**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Support to the inclusion of candidate site reference SR/076/002 within development limits under policy SD1.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

## Policy Strategic Policy - SP 17: Transport and Accessibility

### Representation(s)

**4597 A Liggins [5281]**

**Object**

#### *Summary:*

Can no longer ride on local roads in the Crosshands area as the traffic is increasing year on year and myself and others have experienced too many near misses, and in some cases accidents. At the same time access to off-road riding is diminishing, because of a) tracks being restricted to cycling and walking only ( for example the track from Crosshands to Llanelli which was used continuously by horse riders and is now a Sustrans cycle path; b) parking restrictions for horse trailers and lorries e.g at Llyn Llech Owain.

Carmarthenshire has one of the highest number of horse owners in the UK yet one of the lowest mileage of bridleways in the UK. There is also the missed opportunity for equine tourism, that other nearby counties benefit from, that Carmarthenshire is not making provision for.

I hope that contrary to previous decision making that Carmarthenshire will include and hopefully promote equine pursuits and horse riding within its leisure planning.

**4508 C Lindberg [5270]**

**Object**

#### *Summary:*

My mother has lived in Carmarthenshire for almost 40 years and I myself have lived here on and off through that period. In that time, traffic has increased exponentially, while access for horse riders to off road riding, green lanes and byways continues to decrease. Considerable focus is placed on development of cycling paths and footpaths, which are not accessible to riders, while car parking is restricted for larger vehicles such as horse trailers and lorries.

Please could you tell us what provision is being made for the 20,000 passported horses that are currently kept in Carmarthenshire? No additional off-road access appears to be provided for us in your plan, and existing routes are deteriorating due to lack of funds. I would like to think that my mother's grandchildren will be able to ride their horses in Carmarthenshire, but for that to happen Carmarthenshire Council needs to provide for both current and future needs under the well-being and Future Generations Act.

Furthermore, I would like to draw your attention to the fact that horse riders and owners are a very significant group in the local economy.



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**4521 Mrs Linda Martin [5282]****Object***Summary:*

I am hoping that myself and many other equestrian people will somehow try to make you see why we need more safe off road places to ride in our locality and within Carmarthenshire .

Riding on the roads has got more dangerous over the last 30 years.

The council think that bike riders and walkers are safer off road.

We as equestrians can ride at different places within the county , but some of these places no longer allow us to park our horse transport.

Horse riding is so important to a range of different ages , for health reasons ,especially mental health issues.

We are being discriminated against , and not being provided for under the Well being and future Generations act .

The LDP continues to exclude equestrians as if we don't exist.

I Think it's time to take us horse riders seriously.

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**4515 Mrs Alison Drain [3494]****Object***Summary:*

Even a basic word search does not bring up one mention of 'horses' or 'equestrian'.

The roads are getting busier, the parking restrictions for large vehicles are increasing & old routes to ride have decreased. ALL we see as a group of forgotten people are routes opening up for cyclists. Which remain vastly unused.

Whenever a new route, road or carpark is built or amended, why are horse riders not considered in your plans?

Here is a perfect example:

The new link road in Cross Hands surely needs a path suitable for riders - it leads to one of the Llyn Lech Owain Country Park entrances (Which for additional information, the council have just restricted any horse transport vehicles at). You therefore have one of the only local parks where there are designated riding routes, but where the roads are too busy to hack to, there is now no parking & the road you are building hadn't considered riders needs.

I believe that the council have a responsibility to us as a group to provide for our recreational needs.

I look forward to seeing 'equestrian' & 'horses' in each plan put forward for routes/access.

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**4523 Susan Jones [5284]****Object****Summary:**

I write to you as a concerned Carmarthenshire resident who finds that she has to take her horse, leisure and business to our neighbouring counties because of the poor provision in Carmarthenshire.

Safety - many horse rider in the County are forced onto routes that were once bridleways and are now busy and dangerous roads unsafe to ride.

Sport, wellbeing and disability - There is little provision for sports such as horse riding.

Active and Leisure Travel - Often horses are excluded from development because the aim is for active travel to work.

Rural Economy and tourism - This sport and the care and wellbeing of the horses has significant input into the local economy.

Maintenance - Not only are routes not available/permissible, those which are recorded have been given a very low priority to maintaining these routes due to lack of funding.

Fair access and provision - The focus of the council on leisure cycling has improved routes for cyclists and walkers but excluded horse riders.

Consideration in the plan - In the plan please consider what is Carmarthenshire Council doing to provide free facilities for horse riders.

**4535 K Conroy [5285]****Object****Summary:**

Would like to second the comments raised by Karen Burch of Carmarthenshire riders regarding the lack of inclusion for equestrians.

Whilst I live in an adjoining county I would spend more money in Carmarthenshire if greater opportunities for safe riding were available. E.g. happy to pay to park to ride at Pembrey beach or others safe venues. I would avail myself of tourism facilities if good routes for long hacks were available. A weekend break for horse and rider does not have to be hundreds of miles from home and indeed would reduce CO2 if nearer..

Whilst I appreciate the intention of the active travel grants it seemed very short sighted to exclude equestrians from any multi user route and appalling to intentionally remove routes they have previously been able to access.

I do hope some amendment can be made to at least indicate an intention to support the equestrian community in the future.

**4504 Carmarthenshire Riders (Ms Karen Burch) [653]****Object***Summary:*

There is much mention of active travel and the cycling strategy when there is no equestrian strategy. I am no longer able to ride from my house to meet my friends, to take my horse to the vet in Cross Hands, to access riding lessons in Llanybie or post letters as I used to less than 10 years ago. I cannot get across the A48 safely to ride to Mynydd Mawr or ride to Llyn Lech Owain. (a cycle path is being included alongside the new road but it is not intended for equestrians). Many horse owners are feeling socially excluded by the development, including cycleways we are not allowed to use even though they go to places we can ride off road. We cannot travel safely by horse in our communities any longer and as residents and tax payers our current and future needs are not being provided for under the Well-Being and Future Generations Act. The LDP continues to discriminate and exclude that we exist with mention of "useful" bridleways that do not suggest improvement for riding but inclusion for other users.

**4517 Angela Brown [4139]****Object***Summary:*

I am disappointed how little thought has been given to the Equestrian community. I can only see a brief mention of bridleways under SP17 Transport and Accessibility.

The equestrian community spend a lot of money within the local economy.

The roads are very dangerous with traffic moving so fast it is not safe for horse or rider to attempt certain roads.

Many of the footpaths have also been ridden by myself and others over the years these have been blocked over time or access denied by the gates used.

I believe that all tiers of government within Carmarthenshire should be looking at ways to enhance the safety of the equestrian community as we seem to be the forgotten members of communities or classed as minority or hard to reach groups.

**4509 H Whittle [5271]****Object***Summary:*

What is being done in the plan to provide for equestrians?

In 2012 there were more than 20,000 passported horses in Carmarthenshire.

As development is occurring, the roads are getting busier. No additional off-road access is being provided for us. We are unfairly discriminated against in parking provision as carparks restrict long, heavy or tall vehicles which mean we cannot park our horse transport either.

Provision of cycle ways is being made for walking and cycling under active travel but again we are unfairly discriminated against as we are not permitted to use them.

I believe that Carmarthenshire Council are NOT providing for our current and future needs under the well-being and Future Generations Act.

**4514 Sian Hilbourne [5278]****Object***Summary:*

As vulnerable road users I believe that the plan does not go far enough for horse riders. There are no bridleways or green tracks within riding distance of where my horses are kept, in a rural county this is a huge shame, especially when so much seem to be being done for other vulnerable users.

Another consideration should be the growing industry of equestrian tourism. There is a growing trend of riders taking their horses on holiday & with the forestry and beaches in our beautiful county this should really be a large consideration to bring people into us. I believe Carmarthenshire could have a vast network of off road riding and that could be a major selling point for equestrian tourism. With many farms having to diversify I feel this should also be a consideration.

**4513 Veronica Vaughan [5277]****Object***Summary:*

After growing up in Carmarthenshire and riding horses as a child on dangerous roads we are now in a situation of having even fewer options 20 years on. Now I have my own children I have to let them ride on dangerous roads as you are limiting our options. Why should my children's lives my mother in law's life and my life not to mention our horses, be deemed less worthy than the life of cyclists! Every time I drive on the main road running parallel to a 30mile long cycle path I will have to overtake a cyclist. Some will not even use the facilities that you are banning us from!! Now I may not be a fan of cyclists but I do not begrudge them the safety of the cycle path. Why are you the councils begrudging me and my family the same safety?? Please explain to me why my children's lives are not worth protecting?

**4494 Bethan Jones [5259]****Object***Summary:*

There is much mention of active travel and the cycling strategy when there is no equestrian strategy. We cannot travel safely by horse in our communities any longer and as residents and tax payers our current and future needs are not being provided for under the Well-Being and Future Generations Act. The LDP continues to discriminate and exclude that we exist with mention of "useful" bridleways that do not suggest improvement for riding.

**4475 Cymru Carriage Club (Sally Weale) [5255]****Object***Summary:*

There are a great many carriage drivers across the Carmarthenshire region, but not many people realise we exist as we aren't seen out & about a lot because of the dangerous roads. During the last decade the roads have become more & more dangerous, & although provision on a large scale is being made for walkers & cyclists, riders & carriage drivers seem to have been forgotten yet again.

We bring a lot into the local economy, but there is absolutely no-where for us to enjoy our sport except for on the highway - even Brechfa Forest is closed to us for the foreseeable future because of harvesting works.

Surely it is about time horse riders & carriage drivers are given some support by their County Council, by being included in the plans for everyone to enjoy out lovely countryside, without putting our lives in danger!

**4476 S Lovesey [5256]****Object***Summary:*

Hope that something will change and the Council will start to realise how important that safe off road riding for horses riders and links to existing bridleways are,

Why is the council not putting more effort in providing safe off road riding? Why with all the money being put in to improving the cycling networks are these routes not being aimed to be multi purpose? Meaning that horse riders could access them too? Carmarthenshire has a large equestrian community plus a large potential for equestrian tourism, Carmarthenshire activity encourages people to visit and cycle these routes why not encourage horse riders too?

Roads are so busy it is of concern when we either have to travel on the road or cross one to get to another route. The bridleway and green lanes that are available are regularly not up kept and many are impassable.

Parking has been taken away at many sites that we can box out to ride at so forcing horse riders on to the roads,

In short Carmarthenshire council and the welsh government are falling very short of there requirements to provide safe off road riding for future generations to come.

**4520 Angela Harris [5280]****Object***Summary:*

Horse riders provide a significant input into the local economy that is reliant on the agriculture industry, supporting farming locally for horse accommodation, feed, land maintenance and other services.

CCC acknowledges the existence of differing needs of rural and urban communities but makes no mention of the equestrian communities that exist in the developing urban areas or that we are disadvantaged greatly by council policies and in particular the planning and transport policies that are not keeping us safe on the roads or providing alternatives. There are insufficient bridleways and connectivity. There is mention of important areas for cycling as a leisure activity, such as Pembrey and Brechfa Forest but these are important areas for horse riding too which has not been mentioned as important to the county.

The LDP continues to discriminate and exclude that horseriders exist with mention of "useful" bridleways that do not suggest improvement for riding but inclusion for other users.

*Council's Initial Response*

**Noted.**

**Welsh Government Active Travel Guidance (February 2020 Draft) Paragraph 4.3.5. This recognises equestrianism as "overwhelmingly for leisure purposes rather than as a mode of transport as it rarely displaces a car journey." Criterion b) of policy TRA2, in contributing to the delivery of the Councils duties under the provisions of the Active Travel (Wales) Act 2013, recognises the contribution that Improvements, connections and/or extensions to PROW which specifically includes Bridleways can have. Indeed, the policy encourages incorporating them within the site, and/or through financial contributions delivery off-site provision.**

**Whilst the Plan seeks to recognise and make provision for improvements, connections and/or extensions it is not its role as a land use planning document to identify new networks (including safe off and on road networks) unless specifically identified elsewhere.**

**It is also not the role of the Revised LDP to deal with matters such as charging to access to other areas, restricted use or road safety. All such matters outside the remit of the Plan and would be considered through other forms of guidance, plans or strategies. In this respect the Plan in its preparation has had regard to other Plans and strategies as well as national planning guidance in developing its content and particularly the Rights of Way Improvement Plan noting the interrelationship of the Plan area's footpaths, bridleways and bye-ways and linked leisure opportunities.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3932 Welsh Government (Mr Richard Jones) [2788] Support**

*Summary:*

Accept the principle of much of the proposed methodology of the details submitted in the transport note.

*Council's Initial Response*

**Noted.**

**The Council will continue to work closely with the respondent as part of the preparation and implementation of the Plan.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3931 Welsh Government (Mr Richard Jones) [2788]**

**Support**

*Summary:*

Overall support but it's noted that land has been previously earmarked off the A48 and through PRC3/h13 for the off-slip of a new grade separated junction at Cross Hands and we would be grateful to discuss any opportunity to future proof this

*Council's Initial Response*

**Noted.**

**The Plan, and its policies and proposals is informed by robust evidence. However, we will continue to work closely with the respondent as part of the preparation and implementation of the Plan, including future opportunities for infrastructure improvements.**

*Action*

**No change to the Plan**

*Representation(s)*

**3929 Welsh Government (Mr Richard Jones) [2788]**

**Support**

*Summary:*

Overall support but is noted that J48 at overcapacity and therefore all relevant sites would be subject to monies being secured towards a scheme at J48 and on feeding county network

*Council's Initial Response*

**Noted.**

**The Plan makes provision for the collection of monies in the form of Planning Obligations in support of evidenced infrastructural improvements.**

**The Council will continue to work closely with the respondent as part of the preparation and implementation of the Plan.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3926 Welsh Government (Mr Richard Jones) [2788]**

**Support**

*Summary:*

Sites will need to comply with the Design Manual for Roads and Bridges for any direct access and all should be accompanied by the relevant transport detail when they come forward, that being Transport Assessment and Statements with appropriate junction modelling/mitigation. We would be grateful as highway authority to be included in the scoping of these.

*Council's Initial Response*

**Noted.**

**The Council will continue to work closely with the respondent on the preparation and implementation of the Plan.**

*Action*

**No change to the Plan.**

**Policy TRA1: Transport and Highways Infrastructural Improvements**

*Representation(s)*

**3510 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]**

**Object**

*Summary:*

There may be locations where proposed developments / routes pass over public sewers and water mains. Under the Water Industry Act 1991 we have rights to access our apparatus at all times and protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset. We welcome early engagement once further detail is available.

*Council's Initial Response*

**Noted. We welcome the invitation for further engagement as schemes referenced progress.**

**This relates to a matter at a project level and any proposals would be expected to comply the provisions of the act specified by the respondent. It is not considered necessary to make specific reference to this requirement within the Plan.**

*Action*

**No change to the Plan.**



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## Policy TRA2: Active Travel

### *Representation(s)*

**4492 Bethan Jones [5259]**

**Object**

*Summary:*

Active Travel- the means for the public to travel from one place to another using sustainable transport ie to create modal shift from using cars. However very little "active travel" and modal shift is occurring in the county and the routes created for active travel are seen by the public as leisure routes. The focus of the council on leisure cycling has provided additional access and focus for walking and cycling but not for horse riding. Horse riders are being charged for access to places such as Penbrey Forest and Brechfa Forest.

What is Carmarthenshire Council doing to provide free facilities for horse riders? What alternative travel opportunities are being made for riders to get to safe riding? The plan could include a willingness to create more multiuser routes or alternative access for horses off the Active travel routes.

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**4502 Carmarthenshire Riders (Ms Karen Burch) [653]**

**Object**

*Summary:*

Active Travel- the means for the public to travel from one place to another using sustainable transport ie to create modal shift from using cars. However very little "active travel" and modal shift is occurring in the county and the routes created for active travel are seen by the public as leisure routes. The focus of the council on leisure cycling has provided additional access and focus for walking and cycling but not for horse riding. Horse riders are being charged for access to places such as Penbrey Forest and Brechfa Forest.

What is Carmarthenshire Council doing to provide free facilities for horse riders? What alternative travel opportunities are being made for riders to get to safe riding? The plan could include a willingness to create more multiuser routes or alternative access for horses off the Active travel routes.

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**4518 Angela Brown [4139]**

**Object**

*Summary:*

I am disappointed how little thought has been given to the Equestrian community, with no mention at all of horse riding under TRA2 Active Travel.

The equestrian community spend a lot of money within the local economy.

The roads are very dangerous with traffic moving so fast it is not safe for horse or rider to attempt certain roads.

Many of the footpaths have also been ridden by myself and others over the years these have been blocked over time or access denied by the gates used.

I believe that all tiers of government within Carmarthenshire should be looking at ways to enhance the safety of the equestrian community as we seem to be the forgotten members of communities or classed as minority or hard to reach groups.

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*Council's Initial Response*

**Noted. Policy TRA2 seeks to promote accessibility to alternative means of travel reflecting the duties in respect of Active Travel. In this respect reference is had to the Welsh Government Active Travel Guidance (February 2020 Draft) Paragraph 4.3.5. This recognises equestrianism as "overwhelmingly for leisure purposes rather than as a mode of transport as it rarely displaces a car journey. Forms of equestrian travel (horse riding, carriage driving, pony and trap etc) are not considered forms of active travel."**

**However, the Plan in contributing to the delivery of the Councils duties under the provisions of the Active Travel (Wales) Act 2013, under criterion b) policy TRA2 recognises the contribution that Improvements, connections and/or extensions to PROW which specifically include Bridleways can have. Indeed, the policy encourages incorporating them within the site, and/or through financial contributions delivery off-site provision.**

**The Revised LDP does not seek to identify or create safe routes nor does it deal with matters such as charging to access other areas. These are matters outside the remit of the Plan and would be considered through other forms of guidance, plans or strategies.**

*Action*

**No change to the Plan.**

**Policy TRA4: Redundant Rail Corridors**

*Representation(s)*

**3806 Natural Resources Wales (Miss Sharon Luke) [3253] Object**

*Summary:*

We strongly advise this section includes reference to the importance of redundant rail corridors as wildlife corridors and refers to the GI policy in this respect.

*Council's Initial Response*

**Agreed. Include importance of redundant rail corridors as wildlife corridors.**

*Action*

**Change to the Plan (Focused Changes)**

**Policy Strategic Policy SP 18: Mineral Resources**

*Representation(s)*

**3560 Mineral Products Association Wales (Mr Nick Horsley) [3778] Object**

*Summary:*

Objection to subsection a) of Strategic Policy SP18:

The structure of this subsection is misleading. PPW requires LPAs to maintain and adequate supply of all minerals. Also rather than being and adequate landbank of primary aggregates, the policy should consider non-aggregate minerals, such as agricultural lime, as well as the landbank requirements as stated. At present we consider this is unsound. As such, we suggest the following amendments are incorporated.

Amend the text to read: "Ensuring an adequate supply of minerals, including maintaining an adequate landbank of permitted aggregate reserves (a minimum 10 years for hard crushed rock, and a minimum 7 years for sand and gravel) throughout the Plan period;"

*Council's Initial Response*

**Agreed.**

*Action*

**Text of subsection a) of Policy SP18 to be amended to:**

**"Ensuring an adequate supply of minerals, including maintaining an adequate landbank of permitted aggregate reserves (a minimum 10 years for hard crushed rock, and a minimum 7 years for sand and gravel) throughout the Plan period;"**

*Representation(s)*

**3561 Mineral Products Association Wales (Mr Nick Horsley) [3778] Object**

*Summary:*

Objection to subsection c) of Strategic Policy SP18:

PPW requires LPAs to safeguard Mineral Resources and Minerals Infrastructure. (Our underlining). At present we consider this omission is unsound. The text should be amended to reflect the omission.

Amend the text to read: "Safeguarding minerals infrastructure and areas underlain by minerals of economic importance where they could be worked in the future to ensure that such resources and infrastructure are not unnecessarily sterilised by other forms of development;"

*Council's Initial Response*

**Agreed.**

*Action*

**Text of subsection c) of Policy SP18 to be amended to:**

**"Safeguarding minerals infrastructure, and areas underlain by minerals of economic importance where they could be worked in the future, to ensure that such resources and infrastructure are not unnecessarily sterilised by other forms of development;"**

*Representation(s)*

**3807 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Object**

*Summary:*

Mineral resource is available in quarries within the Cernydd Carmel SAC. We understand that these are either considered dormant or inactive. However, although classed as inactive and dormant, they have extant planning permissions and could become operational again. We note their capacity can be used in the regional landbank figures set out in the Regional Technical Statement (RTS 1st Review 2014).

Any resumption of quarrying within the Cernydd Carmel SAC has to comply with all the relevant legislation, including the Conservation of Habitats and Species Regulations 2017 (as amended). Before commencement, the applicant would have to demonstrate that the operations would have no significant effect on either the biological or geological feature of this European designated site.

*Council's Initial Response*

**Comments noted.**

**Alltygarn Quarry has a permission to work above the water table, if it goes below then it will be subject to HRA. Pwllymarch Quarry has a dormant permission so before it starts up it will need a ROMP which will be subject to EIA and HRA.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3843 G D Harries & Son Ltd (Mr G D Harries) [5077]**

**Object**

**Agent: Simon Chaffe [855]**

*Summary:*

Objection to Strategic Policy SP18: Mineral Resources.

Paragraph 5.14.15 of PPW10 requires development plans to examine landbanks for aggregates to:

- \* Highlight any shortfalls, and to
- \* Ensure productive capacity is maintained.

Analysis in the Carmarthenshire County Council Minerals Topic Paper (October 2019) gives a crushed rock landbank in excess of 50 years. It is not evident, however, that an analysis of productive capacity has been undertaken considering exclusively the active sites listed in the table at paragraph 3.27 (as opposed to excluding those that are stated as being dormant), that is, the analysis should disregard not only dormant sites, as it does currently, but also inactive sites.

*Council's Initial Response*

**Disagree.**

**Landbank calculations are based upon sites that are currently active, as well as those that are currently classed as inactive. Inactive sites could potentially become operational again in that they have extant planning permissions.**

**A landbank, as defined in paragraph 45 of MTAN1, is the stock of planning permissions for the winning and working of minerals at active and inactive sites, at any given point in time and for a given area.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3862 Clint White [5080]**

**Object**

**Agent: Simon Chaffe [855]**

*Summary:*

The Local Development Plan does not comply with PPW10 paragraph 5.14.23 and accordingly high specification aggregates within the County should be identified to include the permitted reserves at Foelfach Quarry together with proximate (unconsented) resources, particularly within the area to the south of the operational quarry.

This would enable the Development Plan to deliver on Policy SP18, particularly criterion b), that is, to encourage '...the efficient and appropriate use of high quality minerals...'; currently it does not.

Furthermore, the Minerals Topic Paper should be amended to give the correct date that mineral extraction will end at Foelfach Quarry - 15 August 2034 (not 15 August 2019).

*Council's Initial Response*

**Disagree.**

**Foelfach Quarry is identified as an active quarry in Appendix 7 of the Deposit Revised LDP and is identified on the proposals map. Any proximate (unconsented) resources would only be identified if they form part of the Aggregate Safeguarding Map of Wales dataset supplied by the British Geological Survey (BGS), which is identified on the Constraints Map.**

**In regard to the date that mineral extraction will end at Foelfach Quarry as stated in the Minerals Topic Paper, this was taken from the 2018 SWRAWP Annual Report published in July 2019. Any revisions needed to be made to the Minerals Topic Paper will be made prior to submission of the Revised LDP (and supporting evidence) to the Welsh Government.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3889 Welsh Government (Mr Mark Newey) [13]**

**Object**

*Summary:*

Category C - Minerals

The Authority should continue to work with other Authorities in the South West Region to ensure the requirements of the recently endorsed Regional Technical Statement (RTS) are satisfied. At present, Carmarthenshire does not provide any evidence to show that the requirement for an additional 2.94mt of sand and gravel (as set out in the RTS 1st) has been satisfied in the South West region. RTS 2nd Revision, which was consulted on last autumn, identified that a 'Sub-Regional Statement of Collaboration' should be prepared to demonstrate how the Authorities satisfy the requirements of the RTS. This statement should be completed before the plan is submitted for examination.

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*Council's Initial Response*

**Agreed.**

*Action*

**In accordance with the recently published RTS 2nd Revision, 'Sub-Regional Statements of collaboration' are currently being prepared with the relevant neighbouring authorities in respect of both hard rock and sand and gravel. The Statements will be completed before the Plan is submitted for examination.**

**Furthermore, Policy SP18 Mineral Resources will be revised to reflect the provisions of the RTS 2nd Revision.**

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**Paragraph Para 11.555**

*Representation(s)*

**3562 Mineral Products Association Wales (Mr Nick Horsley) [3778] Object**

*Summary:*

Objection to the wording of paragraph 11.555:

This paragraph should also reflect the need to safeguard minerals infrastructure. At present we consider this omission is unsound. The text should be amended to reflect the omission. Further, it is not within the County's gift to "provide mineral resources". The County can identify mineral resources and facilitate their delivery by granting planning permission. Such resources could then be considered as "mineral reserves".

Amend the text to read: "The LDP will seek to ensure that the County provides identifies mineral resources and through the grant of planning permission facilitates the delivery of mineral reserves to meet society's needs and that such resources and minerals infrastructure, are safeguarded from sterilisation."

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*Council's Initial Response*

**Agreed in part.**

**This policy relates to mineral resources, however mineral reserves (those resources for which a valid planning permission for extraction exists i.e. permitted reserves) are also covered under this policy.**

**In the interest of clarity, the first sentence of paragraph 11.555 will be amended to be in accordance with PPW10, paragraph 5.14.2, bullet point 1.**

*Action*

**Amend the first sentence of paragraph 11.555 as follows:**

**"The LDP will seek to ensure that the County provides positively for the working of mineral resources to meet society's needs, and that such resources and minerals infrastructure are safeguarded from sterilisation."**





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*Representation(s)*

**4409 G D Harries & Son Ltd (Mr G D Harries) [5077] Object**

**Agent: Simon Chaffe [855]**

*Summary:*

Objection to Paragraph 11.555.

The County cannot 'provide mineral resources', it can, however, provide mineral reserves by granting planning permission for their extraction. We would refer you to the BGS website, where mineral reserves are defined.

This definition is also referenced in Minerals Safeguarding Practice Guidance by The Minerals Products Association and The Planning Officers' Society (April 2019), paragraph 4.1.

We therefore propose that paragraph 11.555 is amended to state,  
'...County protects mineral resources and provides mineral reserves to meet...'

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*Council's Initial Response*

**Agreed in part.**

**This policy relates to mineral resources, however mineral reserves (those resources for which a valid planning permission for extraction exists i.e. permitted reserves) are also covered under this policy.**

*Action*

**In the interest of clarity, the first sentence of paragraph 11.555 will be amended to be in accordance with PPW10, paragraph 5.14.2, bullet point 1 as follows:**

**"The LDP will seek to ensure that the County provides positively for the working of mineral resources to meet society's needs, and that such resources and minerals infrastructure are safeguarded from sterilisation."**

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**Paragraph Para 11.557**

*Representation(s)*

**3563 Mineral Products Association Wales (Mr Nick Horsley) [3778] Object**

*Summary:*

Objection to Paragraph 11.557:

The paragraph should reflect the status of the RTS 2nd Review which is a material consideration.

An appropriate reference to the RTS 2nd Review should be inserted.

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*Council's Initial Response*

**Agreed.**

*Action*

**This paragraph will be re-worded to reflect the recent publication of the RTS 2nd Review.**

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*Representation(s)*

**3564 Mineral Products Association Wales (Mr Nick Horsley) [3778] Object**

*Summary:*

Objection to Paragraph 11.557:

The RTS 2nd Review process is currently in progress. Statements of Sub-Regional Collaboration (SSRCs) will be required to support the local plan evidence base to ensure each mineral planning authority makes an appropriate contribution to meeting local, regional and national needs.

Amend the text to read: "The County's landbank figures for crushed rock is notably in excess of the minimum requirements set out in Minerals Technical Advice Note (MTAN) 1: Aggregates, and consequently there is currently no requirement to allocate new sites for mineral development. However, this may need to be reviewed as part of the RTS 2nd Review process and any subsequent Statements of Sub-Regional Collaboration".

*Council's Initial Response*

**Agreed in part. Whilst the RTS 2nd Review and any subsequent Statements of Sub-Regional Collaboration will be noted in this paragraph, the exact wording will be drawn up as a focused change.**

*Action*

**This paragraph will be re-worded to reflect the recent publication of the RTS 2nd Review and will also make reference to Statements of Sub-Regional Collaboration.**

**Paragraph Para 11.558**

*Representation(s)*

**3565 Mineral Products Association Wales (Mr Nick Horsley) [3778] Object**

*Summary:*

Objection to Paragraph 11.558 in relation to the shortfall in sand and gravel reserves:

It would be helpful to clarify in the text the measures the respective County Councils have taken to address the shortfall. It is assumed that the plan will include site specific allocations, preferred areas or Areas of Search in order to deliver the recognised shortfall.

Provide clarification on the matter.

*Council's Initial Response*

**Agreed.**

*Action*

**This paragraph will be re-worded to clarify the measures the respective County Councils have taken to address the shortfall, making reference to Statements of Sub-Regional Collaboration and Areas of Search for sand & gravel in order to deliver the recognised shortfall.**

**Policy MR1: Mineral Proposals**

*Representation(s)*

**3515 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830] Object**

*Summary:*

Suggest the addition of a further criterion to ensure that utilities infrastructure is protected in any proposal.

*Council's Initial Response*

**Agreed.**

*Action*

**An additional criterion will be included as follows:**

**"Effective measures should ensure that utilities infrastructure is protected."**

*Representation(s)*

**3516 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830] Object**

*Summary:*

We would also welcome supporting text pertaining to any proposal for new or extension sites to include information with regard to existing infrastructure assets and how they will be protected.

*Council's Initial Response*

**Disagree.**

**The agreed measure to include an additional criterion relating to the protection of utilities infrastructure (see representation 3515) is considered to be sufficient.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3844 G D Harries & Son Ltd (Mr G D Harries) [5077]**

**Object**

**Agent: Simon Chaffe [855]**

*Summary:*

Objection to Policy MR1: Mineral Proposals.

Whilst this policy refers to 'a proven national, regional or local need' paragraph 11.560 of the supporting text only considers national demand. The paragraph should be amended to be consistent with Policy MR1.

*Council's Initial Response*

**Agreed.**

*Action*

**Amend text in paragraph 11.560 to:**

**"The purpose of the policy is to maintain a balance between meeting national, regional and local demand for minerals and minimising the potential adverse effects that could result from such operations."**



*Representation(s)*

**3513 Dwr Cymru/Welsh Water (Mr Ryan Norman) [2830]**

**Support**

*Summary:*

We welcome the inclusion of criterion e) of this policy , refer also to 3515 and 3516.

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**



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**Paragraph Para 11.560**

*Representation(s)*

**3566 Mineral Products Association Wales (Mr Nick Horsley) [3778] Object**

*Summary:*

Objection to Paragraph 11.560:

Policy MR1: refers to a "national, regional and local" need for the mineral. We suggest that paragraph 11.560 should align more with the policy.

Amend the text to read: "The purpose of the policy is to maintain a balance between meeting national, regional and local demand for minerals.....".

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*Council's Initial Response*

**Agreed.**

*Action*

**Amend text in paragraph 11.560 to:**

**"The purpose of the policy is to maintain a balance between meeting national, regional and local demand for minerals and minimising the potential adverse effects that could result from such operations."**

=====  
*Representation(s)*

**3863 Clint White [5080] Object**

**Agent: Simon Chaffe [855]**

*Summary:*

Seeking an amendment to Policy MR1: Mineral Proposals, specifically in paragraph 11.560:

Whilst this refers to 'a proven national, regional or local need' paragraph 11.560 only considers national demand. The paragraph should be consistent with MR1.

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*Council's Initial Response*

**Agreed.**

*Action*

**Amend text in paragraph 11.560 to:**

**"The purpose of the policy is to maintain a balance between meeting national, regional and local demand for minerals and minimising the potential adverse effects that could result from such operations."**

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## Paragraph Para 11.561

### *Representation(s)*

**3282 Mr Graham Craig [4222]**

**Object**

#### *Summary:*

Regarding MR1, "Proposals for mineral extraction will be permitted...where they would not result in any significant adverse impacts upon public health, the environment...". This rules out any coal extraction, the burning of which carries extremely significant adverse impacts upon the environment, which in turn impacts upon public health (e.g. heatwaves and new diseases arriving in Wales due to climate change). The LDP should be stronger regarding leaving coal in the ground - actively discouraging or ruling out extraction.

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### *Council's Initial Response*

**Disagree.**

**Policy MR1 is considered sufficient to cover the environmental safeguards relating to all forms of mineral extraction. In respect of coal, this is also covered in paragraph 11.559 under Policy SP18 where the direction from the Welsh Government is set out.**

### *Action*

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## Policy MR2: Mineral Buffer Zones

### *Representation(s)*

**3567 Mineral Products Association Wales (Mr Nick Horsley) [3778]**

**Object**

#### *Summary:*

Objection to Policy MR2: Mineral Buffer Zones:

PPW requires that Buffer Zones are provided as "areas of protection around permitted and proposed mineral workings" also "buffer zones should be identified in development plans around existing or proposed minerals sites".

Both Carmarthenshire and Pembrokeshire County Councils have sought to address the shortfall in sand and gravel reserves. It is assumed that this will be through site allocations. As required by PPW, site allocations should also be protected by Buffer Zones.

Amend the text to read: "Provision has been made for Buffer Zones around all sites with extant planning permission for mineral working and proposed mineral workings."

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### *Council's Initial Response*

**Disagree.**

**It is likely that Carmarthenshire and Pembrokeshire County Councils will address the shortfall in sand and gravel reserves through the identification of areas of search on their proposals maps. New site allocations for sand and gravel will not be made in Carmarthenshire, and therefore the proposed revised wording is not required.**

### *Action*

**No change to the Plan.**

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*Representation(s)*

**3845 G D Harries & Son Ltd (Mr G D Harries) [5077]**

**Object**

**Agent: Simon Chaffe [855]**

*Summary:*

Objection to Policy MR2: Mineral Buffer Zones.

It is considered that thought should be given to how Buffer Zones should be revised during the Plan period should planning permission be granted for mineral extraction at a greenfield site or an extension to an existing quarry.

*Council's Initial Response*

**Disagree.**

**The policy is implicit that all sites with extant planning permission for mineral working will have buffer zones, this would include new sites or extensions to existing quarries that have planning permission granted during the Plan period.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3864 Clint White [5080]**

**Object**

**Agent: Simon Chaffe [855]**

*Summary:*

Seeking an amendment to Policy MR2: Mineral Buffer Zones:

It is considered that thought should be given to how Buffer Zones should be revised during the Plan period should planning permission be granted for mineral extraction at a greenfield site or an extension to an existing quarry.

*Council's Initial Response*

**Disagree.**

**The policy is implicit that all sites with extant planning permission for mineral working will have buffer zones, this would include new sites or extensions to existing quarries that have planning permission granted.**

*Action*

**No change to the Plan.**

## Paragraph Para 11.562

### *Representation(s)*

**3568 Mineral Products Association Wales (Mr Nick Horsley) [3778] Object**

#### *Summary:*

Objection to Paragraph 11.562:

PPW requires that Buffer Zones are provided as "areas of protection around permitted and proposed mineral workings" also "buffer zones should be identified in development plans around existing or proposed minerals sites".

Amend the text to read: "Buffer zones are used to provide areas of protection around permitted mineral workings and proposed mineral workings".

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### *Council's Initial Response*

**Agreed.**

### *Action*

**Amend the last sentence of paragraph 11.562 to the following, in accordance with PPW10:**

**"The identification of buffer zones will ensure that there is clear guidance on the proximity of mineral operations to sensitive land uses, and that the potential impact of mineral workings is recognised and planned for in the area around the existing and proposed mineral operations."**

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*Representation(s)*

**3569 Mineral Products Association Wales (Mr Nick Horsley) [3778] Object**

*Summary:*

Objection to Paragraph 11.562:

PPW requires that Buffer Zones are provided as "areas of protection around permitted and proposed mineral workings also "buffer zones should be identified in development plans around existing or proposed minerals sites".

Amend the text to read: ".....that the potential impact of mineral workings is recognised and planned for in the area around the mineral operations and proposed mineral workings".

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*Council's Initial Response*

**Agreed in part.**

**Mineral operations encompasses mineral workings and so there is no need to differentiate between the two.**

*Action*

**Amend the last sentence of paragraph 11.562 to the following, in accordance with PPW10:**

**"The identification of buffer zones will ensure that there is clear guidance on the proximity of mineral operations to sensitive land uses, and that the potential impact of mineral workings is recognised and planned for in the area around the existing and proposed mineral operations."**

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**Policy MR3: Mineral Safeguarding**

*Representation(s)*

**3375 Barratt David Wilson Homes (Mrs Francesca Evans) [4879]**

**Object**

*Summary:*

BDW objects to this policy. A number of the areas identified as minerals safeguarding areas on the constraints plan are situated immediately adjacent to defined settlement boundaries, accordingly we do not consider it likely or appropriate that mineral resources could be extracted without having an unacceptable impact upon local residential amenity. BDW particularly objects to the inclusion of Land off Heol y Mynydd, Bryn within the minerals safeguarding area as it immediately adjoins the settlement boundaries of Llanelli / Llwynhendy / Bryn. It is considered this Site could be released for residential use without any unacceptable impact upon minerals resources.

*Council's Initial Response*

**Disagree.**

**The mineral safeguarding areas areas shown on the Proposals Map relate to the British Geological Survey (BGS) Aggregate Safeguarding Map for South West Wales, that all local authorities are required to identify. This however, does not necessarily indicate a presumption in favour of working the mineral deposits, merely that the location of the mineral is known.**

**With regards the site cited, paragraph 11.566 sets out distances where mineral extraction will not be acceptable, which includes areas immediately adjacent to defined settlement limits. This would offer protection to sites such as this.**

**Reference should also be made to the Council's response to site AS/086/053 under representation reference number 3376 in respect of this site.**

*Action*

**No change to the Plan.**



*Representation(s)*

**3570 Mineral Products Association Wales (Mr Nick Horsley) [3778] Object**

*Summary:*

Objection to Policy MR3: Mineral safeguarding:

This policy is confusing and is not a true reflection of PPW on a number of grounds.

We recognise that Areas of Search should be safeguarded, but as written, the Policy would appear to suggest that only Areas of Search (AoS) should be safeguarded.

Further, minerals safeguarding is not solely about safeguarding aggregate resources. This should include a wider minerals base and minerals infrastructure.

Amend the text to read: "Planning permission will not be granted for development proposals where they would permanently sterilise resources of minerals aggregate and minerals infrastructure identified within the mineral safeguarding areas (areas of search) on the proposals map unless....."

N.B The proposals map should make a clear distinction between AoS and MSAs

*Council's Initial Response*

**Agreed in part.**

**In the interest of clarity reference to 'Areas of Search' will be deleted.**

**The proposals map will make a clear distinction between Areas of Search (which will relate to sand & gravel only, with a new accompanying policy) and Mineral Safeguarding Areas.**

**This policy relates specifically to the safeguarding of mineral resources identified within mineral safeguarding areas. The safeguarding of infrastructure is covered in Policy SP18 Mineral Resources, and was addressed in the respondent's objection to that policy (refer to representation 3561).**

**In the interest of clarity this Policy shall be amended to MR3: Mineral Safeguarding Areas**

*Action*

**Amend Policy title to MR3: Mineral Safeguarding Areas;**

**Delete reference to 'Areas of Search';**

**The Proposals map key be amended to make a clear distinction between 'Areas of Search' (which will relate to sand & gravel only, with a new accompanying policy) and 'Mineral Safeguarding Areas'.**



*Representation(s)*

**3846 G D Harries & Son Ltd (Mr G D Harries) [5077]**

**Object**

**Agent: Simon Chaffe [855]**

*Summary:*

Objection to Policy MR3: Mineral Safeguarding.

The Policy refers only to the safeguarding of 'resources of aggregate'. PPW10 (paragraph 5.14.7) requires all mineral resources (for example, including agricultural lime), secondary, recycled and marine dredged material together with related infrastructure to be safeguarded. It also refers to '(areas of search)'; it is not clear what is meant in the Policy by this term. The policy therefore needs to be revised to address both of these matters.

Paragraph 11.565 in the supporting text refers to Policy MPP1; please clarify where this reference can be found.

*Council's Initial Response*

**Agreed in part.**

**In the interest of clarity reference to 'Areas of Search' will be deleted.**

**This policy relates specifically to the safeguarding of mineral resources identified within mineral safeguarding areas. The safeguarding of mineral resources and mineral related infrastructure is covered in Policy SP18 Mineral Resources.**

**In the interest of clarity this Policy shall be amended to MR3: Mineral Safeguarding Areas**

**Paragraph 11.565 in the supporting text refers to Policy MPP1. This is a typographical error and will be amended to refer to Policy MR1.**

*Action*

**Amend Policy title to 'MR3: Mineral Safeguarding Areas';**

**Delete reference to 'Areas of Search';**

**Replace reference to Policy MPP1 with MR1 in paragraph 11.565 in the supporting text .**



*Representation(s)*

**3880 Dr William D Rees [541]**

**Object**

*Summary:*

Objection to the categorisation of the site as a Category 2 aggregate safeguarding site under policy MR3.

I wish to object to the designation of this site as a Category2 Aggregate Safeguarding area. Given its location in the centre of the settlement of Glanamman and its proximity to private housing and a watercourse, it is extremely unlikely that this site would ever be given permission for mineral extraction.

*Council's Initial Response*

**Disagree.**

**The mineral safeguarding areas shown on the Proposals Map relate to the British Geological Survey (BGS) Aggregate Safeguarding Map for South West Wales, that all local authorities are required to identify. This however, does not necessarily indicate a presumption in favour of working the mineral deposits, merely that the location of the mineral is known.**

**Indeed, paragraph 11.566 under Policy MR3 sets out distances where mineral extraction will not be acceptable, which includes areas immediately adjacent to defined settlement limits.**

*Action*

**No change to the Plan.**

*Representation(s)*

**3891 Dr William D Rees [541]**

**Object**

*Summary:*

Objection to the designation of land off Llwyncelyn Road as a Category2 Aggregate Safeguarding Area under policy MR3. Given its location in the centre of the settlement of Glanamman and its proximity to private housing and a watercourse, it is extremely unlikely that this site would ever be given permission for mineral extraction.

*Council's Initial Response*

**Disagree.**

**The mineral safeguarding areas shown on the Proposals Map relate to the British Geological Survey (BGS) Aggregate Safeguarding Map for South West Wales, that all local authorities are required to identify. This however, does not necessarily indicate a presumption in favour of working the mineral deposits, merely that the location of the mineral is known.**

**Indeed, paragraph 11.566 under Policy MR3 sets out distances where mineral extraction will not be acceptable, which includes areas immediately adjacent to defined settlement limits.**

*Action*

**No change to the Plan.**

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**Paragraph Para 11.564**

*Representation(s)*

**3572 Mineral Products Association Wales (Mr Nick Horsley) [3778] Object**

*Summary:*

Objection to paragraph 11.564:

The paragraph needs to be broadened to cover minerals infrastructure.

Amend the text to read: "PPW stresses the importance of safeguarding mineral resources and minerals infrastructure that meet society's needs now and in the future."

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*Council's Initial Response*

**Disagree.**

**This policy relates to Mineral Safeguarding Areas. Safeguarding of infrastructure is covered in Policy SP18.**

*Action*

**No change to the Plan.**

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**Policy Strategic Policy - SP 19: Sustainable Waste Management**

*Representation(s)*

**3960 Mr Gavin Griffiths [4040] Object**

**Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]**

*Summary:*

Objection to Policy SP19 "Sustainable Waste Management" through the omission of a site from Appendix 8.

Specifically, our clients consider that the draft Appendix 8 of the LDP, and as referred to under Policy SP19 should be amended to include the "Landfill and Waste Transfer Station" known as "New Lodge, near Cwmgwili" as a "Waste Management Facility".

Such inclusion will ensure that New Lodge will continue as a registered WMF for the purposes of seeking to develop future waste management proposals at the site in the Plan Period, in accordance with the provisions of Policy SP19.

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*Council's Initial Response*

**Disagree.**

**The waste management facilities listed in Appendix 8 were taken from the most up to date list of licenced WM facilities published by NRW, based upon waste permit data returns. The site in question does not appear on this list.**

*Action*

**No change to the Plan.**

*12. Monitoring and Implementation*

**Paragraph 12. Monitoring and Implementation**

*Representation(s)*

**4367 Welsh Government: Welsh Language Commissioner (Ms Meinir Jones) [9159]****Summary:**

Mae'r Cynllun a'r asesiad effaith ieithyddol yn adnabod yr angen am dai fforddiadwy ym mhob ardal datblygu, ac am amrywiaeth o dai gwahanol, gyda'r bwriad o geisio darparu tai sy'n ateb gofynion cymunedau, a thrwy hyn, sicrhau hyfywedd yr iaith Gymraeg. Er hyn, er bod y rhain wedi eu seilio ar batrymau yn y gorffennol, ni ellir rhagweld yn llwyr beth fydd effaith y cynllun ar y Gymraeg yn y dyfodol. Pwysleiswn felly y bydd angen i'r awdurdod fabwysiadu dull cadarn o fonitro effeithiau'r Cynllun ar y Gymraeg wrth iddo gael ei weithredu, ac ymateb yn rhagweithiol lle bo angen, a hynny o safbwynt y datblygiadau newydd a'r stoc dai sydd eisoes yn bodoli.

Dangosodd ffigyrau Cyfrifiad 2011 fod cyfran y siaradwyr Cymraeg yn Sir Gaerfyrddin yn sylweddol uwch na chyfartaledd cenedlaethol Cymru. Er hynny, gwelodd rhai cymunedau yn Sir Gaerfyrddin y cwmp mwyaf yng nghyfran eu siaradwyr Cymraeg rhwng 2001 a 2011. Er mwyn troi'r trai ar y patrwm hwn ac arwain y sir at dwf yn nifer ei siaradwyr Cymraeg, mae'n hanfodol fod y Cynllun Datblygu Lleol yn cefnogi, hyrwyddo a gwella sefyllfa'r Gymraeg fel iaith gymunedol. Bydd angen cymryd camau rhagweithiol os canfyddir nad yw'r Cynllun yn cael yr effaith gadarnhaol a amcanir.

Un o flaenoriaethau'r Cynllun yw sicrhau bod y boblogaeth leol yn cael y cyfle i aros yn Sir Gaerfyrddin yn hytrach na'u bod yn gadael i chwilio am gyfleoedd gwaith a thai mewn mannau eraill, yn ogystal â chreu cyfleoedd i rai sydd eisoes wedi allfudo i ddychwelyd i'r ardal. Bydd angen strategaeth uchelgeisiol i gyd-fynd â'r amcan yma; i fapio lle mae brodorion y sir wedi mynd a sut byddid yn mynd ati i'w denu yn ôl. Bydd angen gweithredu'n strategol hefyd i sicrhau bod y cyfleoedd gwaith newydd a amcanir drwy'r Cynllun yn arwain at gyfleoedd i ddefnyddio'r Gymraeg.

Mae adran monitro a gweithredu'r Cynllun yn nodi ei bod yn ofynnol adrodd ar fframwaith fonitro'r Cynllun yn flynyddol a chyflwyno adroddiad i Lywodraeth Cymru. Mae'n nodi hefyd bydd rhaid gwneud adolygiad llawn o'r Cynllun cyfan pob pedair blynedd. Rydym yn disgwyl i'r adroddiadau blynyddol a'r adolygiadau llawn gynnwys ystyriaeth gynhwysfawr o effaith y Cynllun ar y Gymraeg. I'r perwyl hwnnw, nid ydym yn credu fod y dangosydd yn erbyn yr amcan strategol ar y Gymraeg yn y tabl yn adran 12 yn ddigonol. Nid yw dibynnu ar ganlyniadau'r Cyfrifiad, na data'r Llywodraeth neu'r Swyddfa Ystadegau Gwladol am fod yn ddigonol ynddynt eu hunain i roi darlun eang a chyfredol o sefyllfa'r Gymraeg. Rydym o'r farn y dylid cynnal arolwg penodol gyda chymunedau a effeithir, ochr yn ochr â defnydd o ystadegau swyddogol.

The plan and the language impact assessment identify the need for affordable housing in each development area, and for a variety of different housing, with a view to trying to provide housing that meets the needs of communities and therefore, ensuring the viability of the Welsh language. However, although these have been based on past trends, it is impossible to fully anticipate the future impact of the scheme on the Welsh language. We therefore stress that the authority will need to adopt a robust approach to monitoring the effects of the plan on the Welsh language as it is implemented, and to respond proactively where necessary in relation to the new developments and existing housing stock.

The 2011 Census figures showed that the proportion of Welsh speakers in Carmarthenshire was significantly higher than the national average for Wales. However, some communities in Carmarthenshire saw the biggest decrease in the proportion of their Welsh speakers between 2001 and 2011. In order to turn the tide on this trend and lead the county to growth in the number of its Welsh speakers, it is essential that the Local Development Plan supports, promotes and enhances the position of the Welsh language as a community language.



Proactive action will be required if the Plan is found not to have the anticipated positive effects.

One of the priorities of the Plan is to ensure that the local population is given the opportunity to stay in Carmarthenshire rather than leaving to seek work and housing opportunities elsewhere, as well as creating opportunities for those who have already left to return to the area. This objective will need to be accompanied by an ambitious strategy; to map where the county's people have gone and how the authority would go about attracting them back. There will also be a need for strategic action to ensure that the new employment opportunities anticipated in the Plan lead to opportunities to use the Welsh language.

The monitoring and implementation section of the Plan states that it is a requirement to report on the Plan's monitoring framework annually and to submit a report to the Welsh Government. It also states that a full review of the whole Plan must be undertaken every four years. We expect the annual monitoring reports and full reviews to include comprehensive consideration of the Plan's impact on the Welsh language. To that end, we do not believe that the indicator against the strategic objective on the Welsh language in the table in section 12 is sufficient. Relying on Census results, or Government or ONS data will not be sufficient in themselves to give a broad and up to date picture of the position of the Welsh language. We are of the view that a specific survey should be undertaken with affected communities, alongside the use of official statistics.

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*Council's Initial Response*

**Nodir y sylwadau.**

**Bydd rhagor o dystiolaeth yn cael ei darparu cyn cyflwyno'r Cynllun i'w Archwilio. Mae hyn yn cynnwys adeiladu ar yr Asesiad o'r Effaith ar y Gymraeg (Rhagfyr 2019), ymgymryd â gwaith dadansoddi pellach o ran Rhagamcanion poblogaeth ac Aelwydydd / data mudo a hefyd diweddarau yr Astudiaeth Economaidd Dwy Sir ar gyfer Sir Gaerfyrddin a Sir Benfro (Hydref 2019). Bydd y diweddariad yma i'r Astudiaeth Economaidd yn rhoi ystyriaeth bellach i gysylltiadau rhwng y Gymraeg a'r economi yn y ddwy Sir.**

**Rhoddir sylw priodol i'r angen i ddiweddarau'r fframwaith monitro mewn perthynas â'r Gymraeg, a bydd yn cael ei ddiweddarau cyn cyflwyno'r cynllun i'w Archwilio. Bydd hyn yn rhan o waith tystiolaethol pellach y bydd y Cyngor yn ei wneud fel y cyfeirir ato uchod. Er bod rhai dangosyddion cyd-destunol yn ddefnyddiol i ddarparu gwybodaeth ychwanegol, bydd rôl y CDLI fel cynllun datblygu a dogfen polisi cynllunio yn pennu natur gwaith yr arolwg er mwyn sicrhau nad yw'r CDLI yn monitro gwybodaeth y tu hwnt i'w gylch gwaith a'i ddylanwad.**

**Comments noted.**

**Further evidence will be produced ahead of the submission of the Plan for Examination. This includes building upon the Welsh Language Impact Assessment (December 2019), undertaking further analysis work in terms of population and household projections/ migration data and also updating the Two County Economic Study for Carmarthenshire and Pembrokeshire (October 2019). This update to the Economic Study will further consider the links between the Welsh language and the economy in the two Counties.**

**Due regard will be given as to the need to update monitoring framework in regards the Welsh language will be updated ahead of the submission of the plan for Examination. This will form part of further evidential work to be undertaken by the Council as referred to above. Whilst some contextual indicators are helpful to provide additional information, the role of the LDP as a development plan and a planning policy document will dictate the nature of the survey work in order to ensure that the LDP does not monitor information beyond its remit and influence.**

*Action*

**Dim newid i'r Cynllun.**

**No change to the Plan.**



*Representation(s)*

**3871 Welsh Government (Mr Mark Newey) [13]**

**Object**

*Summary:*

Category B - The DPM is clear that an Implementation and Delivery Appendix must be included in the plan, which sets out key issues, constraints, phasing and mitigation measures on allocated sites.

*Council's Initial Response*

**Agreed. The Council will amend the Monitoring and Implementation framework to reflect the requirement set out within DPM 3.**

*Action*

**Change to the Plan.**

*Representation(s)*

**3890 Welsh Government (Mr Mark Newey) [13]**

**Object**

*Summary:*

Category C - Monitoring Framework

Monitoring indicators listed in the DPM should be embedded into the LDP monitoring framework with trigger points that are not too wide ranging (at 20%).

*Council's Initial Response*

**Noted. The monitoring and implementation framework will develop in line with the amendments made in the Focused Changes to the plan and will be considered at examination.**

*Action*

**No immediate change to the Plan.**

**Paragraph Para 12.9**

*Representation(s)*

**3809 Natural Resources Wales (Miss Sharon Luke) [3253]**

**Support**

*Summary:*

We note an annual monitoring report will be undertaken for submission to WG. Reviewing the plan in order to keep it relevant and up to date is paramount so it has regard for changes and circumstances and national guidance. As noted earlier the revised TAN 15 is due to be published and will need to be reflected in the LDP, before your next 4 yearly whole plan review.

*Council's Initial Response*

**Support welcomed**

*Action*

## 13. Glossary

### Paragraph 13. Glossary

#### *Representation(s)*

**4025 Dyfodol (J W Thomas) [563]**

**Object**

#### *Summary:*

Rydym yn deall mai'r flaenoriaeth yn Sir Gaerfyrddin yw tai cymdeithasol a fforddiadwy, ac mae angen diffinio fforddiadwyedd yn lleol.

We understand that the priority in Carmarthenshire is for social and affordable homes, and affordability needs to be defined in local terms.

#### *Council's Initial Response*

**Nodir y sylwadau.**

**Nodir y diffiniad o dai fforddiadwy at ddibenion y CDLI diwygiedig yn Nodyn Cyngor Technegol 2 - Cynllunio a Thai Fforddiadwy (2006).**

**Mae'r CDLI yn cael ei lywio gan nifer o ddogfennau tystiolaeth allweddol gan gynnwys Aseiad o'r Farchnad Dai Leol 2019 (Tachwedd 2020), a'r Astudiaeth Anghenion Gwledig (Tachwedd 2019) sy'n ceisio cefnogi'r swyddogaeth o ddiwallu'r anghenion am dai yn Sir Gaerfyrddin. Mae'r dogfennau hyn, ynghyd â ffactorau datblygiadol allweddol eraill, yn ceisio darparu dull cytbwys wrth ddatblygu gweledigaeth y CDLI a'i chyflawni.**

**Comments noted.**

**The definition of affordable housing for the purposes of the revised LDP is identified in Technical Advice Note 2 - Planning and Affordable Housing (2006).**

**The LDP is informed by a number of key evidence documents including the Local Housing Market Assessment 2019 (October 2020) and the Rural Needs Study (November 2019) which seek to support the function of meeting housing need within Carmarthenshire. These documents, along with other key developmental factors seek to provide a balanced approach in developing and delivering on the LDP's vision.**

#### *Action*

**Dim newid i'r Cynllun.**

**No change to the Plan.**

*Appendix 1 - Legislative and National Context*

**Paragraph Appendix 1 - Legislative and National Context**

*Representation(s)*

**3574 Mineral Products Association Wales (Mr Nick Horsley) [3778] Object**

*Summary:*

Objection to the omission of the Regional Technical Statement for Minerals from Appendix 1.  
Reference to the Regional Technical Statement should be added to Appendix 1.

*Council's Initial Response*

**Agreed, subject to the document being endorsed by the constituent authorities in the South Wales Region.**

*Action*

**Reference to the Regional Technical Statement 2nd Review 2020 will be added to Appendix 1 (subject to the document's endorsement by the constituent authorities of the South Wales region).**

*Appendix 2 - Regional and Local Context*

**Paragraph Appendix 2 - Regional and Local Context**

*Representation(s)*

**4595 Ceredigion County Council (Anjuli Davies) [5303] Object**

*Summary:*

The Council request that this appendix is updated to reflect the Preferred Strategy for the replacement Ceredigion Local Development Plan 2018-2033 when published for re-consultation. Ceredigion County Council would welcome to opportunity to discuss what level of growth is sustainable and should be absorbed by settlements within the Teifi Valley.

*Council's Initial Response*

**Noted. Appendix 2 will be updated as appropriate to reflect the latest position of the respective Plans and Strategies.**

**The Council is committed to ongoing cross border working and regional (and sub regional) working. Consequently we welcome ongoing and future discussions.**

*Action*

**Plan to be amended as and when appropriate.**

**Appendix 6 - Policy Assessment**

**Paragraph Appendix 6 - Policy Assessment**

*Representation(s)*

**3576 Mineral Products Association Wales (Mr Nick Horsley) [3778] Object**

*Summary:*

Objection to Appendix 6 - Policy Assessment, in regard to Strategic Policy: SP18 Mineral Resources:

Whilst we recognise Policy SP18 can make a marked contribution to reducing the effects of climate change, we feel the Strategic Objectives should reflect the need for an adequate supply of minerals as required by PPW.

Amend the text accordingly.

Objection to Appendix 6 - Seeking amendment to reflect the need for an adequate supply of minerals

*Council's Initial Response*

**Disagree.**

**The strategic objectives are broad, generic objectives that do not relate specifically to individual topic areas such as minerals, and so SO7 cannot be changed to include reference to mineral resources. Notwithstanding, an adequate supply of minerals is covered in SO7 through reference to "...the efficient use and safeguarding of resources."**

*Action*

**No change to the Plan.**



**Appendix 7 - Housing Trajectory**

**Paragraph Appendix 7 - Housing Trajectory**

*Representation(s)*

**3873 Welsh Government (Mr Mark Newey) [13]**

**Object**

*Summary:*

Category B - A housing trajectory has been included in Appendix 7. The Council should follow detailed guidance set out in the DPM to construct the trajectory ensuring it is calculated on the housing requirement and not provision.

*Council's Initial Response*

**Noted.**

*Action*

**The Housing Trajectory will have consequential amendments in line with other representations and policy changes.**

*Representation(s)*

**4596 Ceredigion County Council (Anjuli Davies) [5303]**

**Object**

*Summary:*

There is discrepancy between the numbers in the site schedule and the Housing allocation policy HOM1. In the policy, SeC12/h2 Heol Dewi is allocated for 14 units, whereas in the site schedule, Total site capacity is for 8 units. Also, the total number of housing units for Cluster 4 is identified as 402 in HOM1 and 375 in appendix 7. Ceredigion County Council would appreciate if these discrepancies could be accounted for and explained.

*Council's Initial Response*

**Disagree. Appendix 7 - Housing Trajectory is broken up into 'allocations' (those that have no planning permission) and 'commitments' (those that have a form of planning permission). There are numerous examples within the Plan where a part of an allocated site identified within the HOM1 table may have planning permission whilst another part of the site may not. They are therefore separated into the relevant table set out within Appendix 7. In combination, the allocated figure and the commitment figure tallies up to the figure set out within HOM1.**

*Action*

**No action.**

*Representation(s)*

**4456 Aled & Sarah Jones & Holmes [3654]**

**Object**

*Summary:*

The planned housing trajectories are not realistic, especially now because of the economic effect Covid-19 will have on the UK.

*Council's Initial Response*

**Noted. Reference should be made to the COVID-19 assessment which forms as part of the plan's supporting document. The Housing Trajectory and the plan's content will be subject to annual monitoring to measure its delivery.**

*Action*

**No change to the Plan**

*Representation(s)*

**3147 Barton Willmore (Joe Ayoubkhani) [646]**

**Support**

*Summary:*

Appendix 7: Housing Trajectory

We note that all units are shown as being delivered within the plan period, which is fully supported. There is potential for an application to be submitted prior to the date of 2024 stated.

*Council's Initial Response*

**It is noted that an application may be submitted prior to the date of 2024 that is stated. Further discussion will be had with the developer/agent to agree a timescale.**

*Action*

**Amend the site trajectory to reflect discussions held with the developer/agent in respect of site SuV37/h2: Land south of Cae Coedmore, Cwmann.**



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*Appendix 8 - Waste Management Sites*

**Paragraph Appendix 8 - Waste Management Sites**

*Representation(s)*

**3961 Mr Gavin Griffiths [4040] Object**

***Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]***

***Summary:***

Objection to the omission of a waste management site from Appendix 8.

Specifically our clients consider that the draft Appendix 8 of the LDP, and as referred to under Policy SP19, should be amended to include the "Landfill and Waste Transfer Station" known as "New Lodge, near Cwmgwili" as a "Waste Management Facility".

Such inclusion will ensure that New Lodge will continue as a registered WMF for the purposes of seeking to develop future waste management proposals at the site in the Plan Period, in accordance with the provisions of Policy SP19.

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***Council's Initial Response***

**Disagree.**

**The waste management facilities listed in Appendix 8 were taken from the most up to date list of licenced WM facilities published by NRW, based upon waste permit data returns. The site in question does not appear on this list.**

***Action***

**No change to the Plan.**

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## **Appendix - Overview of Consultation Responses on SA/SEA and HRA**

### **Sustainability Appraisal Responses**

The Sustainability Appraisals (SA) of Local Development Plans include an assessment of the likely effects of the plan on the use of the Welsh language. Objections were raised in relation to a clerical error, and to the housing allocation impact on the Welsh language. These objections were also raised as responses to consultation on the deposit plan. The SA objections were disagreed, and no changes have been made to the SA as a result.

The SA has made the following response to the Welsh language representation.

Under the duty imposed by the Well-Being of Future Generations (Wales) Act 2015, the Authority has an obligation to promote 'A Wales of vibrant culture and thriving Welsh language', and is required to promote and protect culture, heritage and the Welsh Language. In line with this act and PPW 10, and the Welsh Language Requirements under TAN 20, the authority has considered the likely effect of development plans on the use of Welsh language as part of the Sustainability Appraisal. In accordance with this, the authority has sought to ensure a broad distribution and phasing of development that considers the ability of the area or community to accommodate development without adversely impacting use of the Welsh language.

The SA identified that predicted increase in the numbers of young persons is likely to have positive effects on the Welsh language. It is the authority's intention to promote the retention of younger people and encourage growth of the Welsh language and culture. Adequate housing provision, and the job creation and skills associated with the Swansea Bay City Region, in particular Yr Egin, which house S4C's offices, will help to retain young Welsh speakers in the county.

To strengthen the authority's intention, and to mitigate any potential minor detrimental effect on the Welsh language, the authority has made provision under the following objectives and policies:

SP7 – Welsh language and Culture

SA11 – Encourage Growth of the Welsh language and culture

SA13 – Increase levels of literacy (in both Welsh and English) and numeracy

To strengthen the policies further, specific reference is made to the motion passed by Council in July 2019 for the whole county of Carmarthenshire to be considered linguistically sensitive and for Welsh language to be a material planning consideration in all developments of 10 houses or more.

Welsh language will continue to be a priority for the authority as stated in the LDP Vision: One Carmarthenshire. HRA Responses

### **HRA Responses**

There were a total of 33 Consultation responses to the HRA received from NRW and Pembrokeshire Coast National Park. The majority of the responses identified minor errors on names, wording and dates. Responses were also made in relation to 'screening in' of sites that had been 'screened out'. These have been agreed and later addressed at the 'appropriate assessment stage'. There are no implication for the deposit Plan. All changes have been made to the HRA document.

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## Appendix 4 – Sustainability Appraisal (incl Strategic Environmental Assessment) Responses to Representations Received

Respondent	SA Ref. No.	Respondent Comment - Cymraeg	Respondent Comment - English	SA Response English	SA Response Cymraeg	Implication for the Plan
Rhanbarth Sir Gâr, Cymdeithas yr Iaith*	001	Mae Deddf Cynllunio (Cymru) 2015 yn ei gwneud yn ofynnol i Arfarniadau Cynaliadwyedd Cynlluniau Datblygu Lleol gynnwys asesiad o effeithiau tebygol y cynllun ar y defnydd o'r Gymraeg yn ardal yr Awdurdod (A.11(3))	The Planning (Wales) Act 2015 requires the Sustainability Appraisals of Local Development Plans to include an assessment of the likely effects of the plan on the use of the Welsh language within the area of the Authority (S.11(3)).	The Welsh Language Impact Assessment has been available on the Council's website as part of the LDP evidence base for the duration of the consultation on the Deposit Revised LDP	Mae'r Asesiad o'r Effaith ar y Gymraeg wedi bod ar gael ar wefan y Cyngor fel rhan o sylfaen dystiolaeth y CDLI trwy gydol yr ymgynghoriad ar y CDLI Diwygiedig Adneuo	No
Rhanbarth Sir Gâr, Cymdeithas yr Iaith*	002	Roedd y Cyngor am ymateb i bryderon Llywodraeth Cymru yn yr Arfarniad Cynaliadwyedd, meddai, ond mae'n anodd gweld sut yn union mae'r cwestiynau hyn wedi cael ei hateb. Ar ben hynny, mae'n amlwg nad yw'r Arfarniad Cynaliadwyedd yn waith gorffenedig, Mae'r adran am y Gymraeg yn cynnwys y frawddeg "Mwy i'w gynnwys o Bapur Pwnc y Gymraeg" (tudalen 158), er enghraifft.	The Council wished to respond to the Welsh Government's concerns in the Sustainability Appraisal, it said, but it is difficult to see exactly how these questions have been answered. Furthermore, it is clear that the Sustainability Appraisal is not a finished piece of work. The Welsh language section contains the sentence "More to be included from the Welsh Language Topic Paper" (page 158), for example.	The omission on page 158 of the SA was the result of a clerical error.	Gwall clericyddol oedd yn gyfrifol am yr hepgoriad ar dudalen 158 o'r Arfarniad Cynaliadwyedd.	No
Llyr Evans	003	1.46 Y Gymraeg Byddai caniatáu codi 8,000 o dai newydd yn Sir Gaerfyrddin yn effeithio mewn	1.46 The Welsh Language. Granting permission to build 8,000	Under the duty imposed by the Well-Being of	O dan y ddyletswydd a osodir gan Ddeddf Llesiant	No

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		<p>modd cwbl andwyol ar y Gymraeg. Mae sefyllfa ein cymunedau Cymraeg yn enbyd o fregus ar hyn o bryd a byddai'r polisi gwallgof hwn yn rhoi'r ergyd farwol iddynt. Gwrthwynebaf y bwriad hwn yn llwyr.</p>	<p>new houses in Carmarthenshire would have a severe adverse impact on the Welsh language. Welsh speaking communities are currently in an extremely vulnerable position and this crazy policy would be the final nail in the coffin for them. I completely object to this.</p>	<p>Future Generations (Wales) Act 2015, the Authority has an obligation to promote 'A Wales of vibrant culture and thriving Welsh language', and is required to promote and protect culture, heritage and the Welsh Language. In line with this act and PPW 10, and the Welsh Language Requirements under TAN 20, the authority has considered the likely effect of development plans on the use of Welsh language as part of the Sustainability Appraisal (SA). In accordance with this, the authority has sought to ensure a broad distribution and phasing of development that takes into account the ability of the area or community to accommodate development without</p>	<p>Cenedlaethau'r Dyfodol (Cymru) 2015, mae rhwymedigaeth ar yr Awdurdod i hyrwyddo 'Cymru â diwylliant bywiog lle mae'r Gymraeg yn ffynnu', ac mae'n ofynnol iddo hyrwyddo a diogelu diwylliant, treftadaeth a'r laith Gymraeg. Yn unol â'r ddeddf hon a Pholisi Cynllunio Cymru 10, a Gofynion y Gymraeg o dan TAN 20, mae'r awdurdod wedi ystyried effaith debygol cynlluniau datblygu ar y defnydd o'r Gymraeg fel rhan o'r Arfarniad Cynaliadwyedd. Yn unol â hyn, mae'r awdurdod wedi ceisio sicrhau dosbarthiad a chyflwyniad eang i'r datblygiad sy'n ystyried gallu'r ardal neu'r gymuned i ganiatáu'r datblygiad heb gael effaith andwyol ar y defnydd o'r Gymraeg.</p> <p>Nododd yr Arfarniad Cynaliadwyedd fod y cynnydd a ragwelir yn nifer y bobl ifanc</p>	
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**Appendix 4 – Sustainability Appraisal (incl Strategic Environmental Assessment)  
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				<p>adversely impacting use of the Welsh language.</p> <p>The SA identified that predicted increase in the numbers of young persons is likely to have positive effects on the Welsh language. It is the authority's intention to promote the retention of younger people and encourage growth of the Welsh language and culture. Adequate adequate housing provision, and the job creation and skills associated with the Swansea Bay City Region, in particular Yr Egin, which house S4C's offices, will help to retain young Welsh speakers in the county.</p> <p>To strengthen the authority's intention, and to mitigate any potential minor detrimental effect on the Welsh language, the</p>	<p>yn debygol o gael effaith gadarnhaol ar y Gymraeg. Bwriad yr awdurdod yw hyrwyddo'r gwaith o gadw pobl iau ac annog twf y Gymraeg a diwylliant Cymru. Bydd darpariaeth dai ddigonol, a'r swyddi a gaiff eu creu a'r sgiliau sy'n gysylltiedig â Dinas-ranbarth Bae Abertawe, yn arbennig Yr Egin, sy'n gartref i swyddfeydd S4C, yn helpu i gadw siaradwyr Cymraeg ifanc yn y Sir.</p> <p>Er mwyn cryfhau bwriad yr awdurdod, a lliniaru unrhyw effaith andwyol bosibl ar y Gymraeg, mae'r awdurdod wedi gwneud darpariaeth o dan yr amcanion a'r polisiau canlynol;</p> <p>SP7 - Y Gymraeg a Diwylliant Cymru</p> <p>SA11 – Annog Twf yr iaith Gymraeg a'i diwylliant</p> <p>SA13 – Cynyddu lefelau llythrennedd (Cymraeg a Saesneg) a rhifedd</p>	
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**Appendix 4 – Sustainability Appraisal (incl Strategic Environmental Assessment)  
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				<p>authority has made provision under the following objectives and policies;</p> <p>SP7 – Welsh language and Culture</p> <p>SA11 – Encourage Growth of the Welsh language and culture</p> <p>SA13 – Increase levels of literacy (in both Welsh and English) and numeracy</p> <p>To strengthen the policies further, specific reference is made to the motion passed by council July 2019 for the whole county of Carmarthenshire to be considered linguistically sensitive and for Welsh language to be a material planning consideration in all developments of 10 houses or more.</p> <p>Welsh language will continue to be a priority</p>	<p>Er mwyn cryfhau'r polisiau ymhellach, cyfeirir yn benodol at y cynnig a basiwyd gan y Cyngor ym mis Gorffennaf 2019 am i Sir Gaerfyrddin gyfan gael ei hystyried yn ieithyddol sensitif ac i'r iaith Gymraeg fod yn ystyriaeth gynllunio berthnasol ym mhob datblygiad o 10 tŷ neu fwy.</p> <p>Bydd y Gymraeg yn parhau i fod yn flaenoriaeth i'r awdurdod fel y nodir yng Ngweledigaeth y CDLI: Un Sir Gâr.</p>	
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**Appendix 4 – Sustainability Appraisal (incl Strategic Environmental Assessment)  
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				for the authority as stated in the LDP Vision: One Carmarthenshire.		
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\*Formed part of a broader submission subdivided into the representations above and as response to the content of Deposit Revised LDP.

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## Appendix 5 – Habitat Regulations Assessment Responses to Representations Received

Respondent	Ref. No.	Respondent Comment	Response/Action	Implication for the Plan
Natural Resources Wales – Sharon Luke	HRA 001	2.3.1. Contains an error on the regulation	Amended accordingly. This error has been removed.	No
Natural Resources Wales – Sharon Luke	HRA 002	2.4.1. Contains an error on the legislation date.	Amended accordingly. This error has been corrected.	No
Natural Resources Wales – Sharon Luke	HRA 003	2.4. The full reference should be included for TAN 5.	The full reference for TAN 5 has been added.	No
Natural Resources Wales – Sharon Luke	HRA 004	3.1.1. We welcome the recognition that distance is not a definitive guide to the likelihood impact on a site.	Comments gratefully noted.	No
Natural Resources Wales – Sharon Luke	HRA 005	Table 3 The site names, notably Carmarthen Bay Dunes, need to be written in full for clarification.	Amended accordingly.	No
Natural Resources Wales – Sharon Luke	HRA 006	Table 3 Section 2 - Carmarthen Bay Dunes should be included as dune slacks can be impacted by hydrological and aquatic impacts.	Amended accordingly.	No
Natural Resources Wales – Sharon Luke	HRA 007	Table 3 Section 2 - Cernydd Carmel should be included in both parts as the turlough could be impacted.	Amended accordingly .	No
Natural Resources Wales – Sharon Luke	HRA 008	Table 3 Section 6 - We agree with your reasoning Cernydd Carmel does not need to be included.	Noted.	No
Natural Resources Wales – Sharon Luke	HRA 009	Table 3 Section 16 – We note your reference to the species in Section 14.	Noted.	No
Natural Resources Wales – Sharon Luke	HRA 010	Table 4 The summary of generic level screening “Identify allocations in close proximity to a watercourse that flows in/out of sites” requires amendment. We suggest: Identify allocations with	Amended as suggested.	No

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## Appendix 5 – Habitat Regulations Assessment Responses to Representations Received

		a pathway to a watercourse that flows in/out of sites.		
Natural Resources Wales – Sharon Luke	HRA 011	Table 6 You have agreed that Elenydd-Mallaen should be included for bird assemblage, but it has not been amended in the table	I think this error was with regard to the table numbering and not that Elenydd - Mallaen SPA should be added to Table 6 which deals with European sites identified as vulnerable to effects on the coast. Elenydd Mallaen has instead been added to Table 7 which details sites identified as vulnerable to effects on mobile species.	No
Natural Resources Wales – Sharon Luke	HRA 012	3.2.42. You amended this section in your reply to our comments (3.2.36) however it has not been amended in the report. We are satisfied with the amended wording noted in your reply.	Agreed and amended accordingly .	No
Natural Resources Wales – Sharon Luke	HRA 013	3.2.66. Acronym used for EA and not given in full.	Agreed and amended accordingly .	No
Natural Resources Wales – Sharon Luke	HRA 014	Table 11 Carmarthen Bay Dunes to be included as water quality could impact features such as the dune slacks and Petalwort.	Agreed and amended as suggested.	No
Natural Resources Wales – Sharon Luke	HRA 015	Table 14 The summary of generic level screening for the aquatic environment requires amendment. We suggest: Identify allocations with a pathway to a watercourse that flows in/out of sites.	Agreed and amended as suggested.	No
Natural Resources Wales – Sharon Luke	HRA 016	3.2.104. We note that the Carmarthen Bay and Estuaries European Marine Site (CBEEMS) is noted, this encompasses three marine Natura 2000 sites: Carmarthen Bay SAC, Carmarthen Bay SPA and Burry inlet SPA. CBEEMS should be defined within	Agreed. Paragraph 3.1.12 has been added at the end of Section 3.1 to make it clear that any reference to Carmarthen Bay and Estuaries European Marine Site refers to the	No

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## Appendix 5 – Habitat Regulations Assessment Responses to Representations Received

		the document. Consideration also needs to be given to Carmarthen Bay Dunes SAC in this section.	three marine Natura 2000 sites: Carmarthen Bay SAC, Carmarthen Bay SPA and Burry inlet SPA and the Burry Inlet Ramsar.  Carmarthen Bay Dunes SAC has also been added and referred to subsequently in the relevant sections.	
Natural Resources Wales – Sharon Luke	HRA 017	Table 16 SP18 Mineral resources - This should not be screened out due to Cernydd Carmel SAC.	Agreed that this policy should not be screened out due to extant minerals permissions beneath the Cernydd Carmel SAC. This section has been amended accordingly and the policy considered at the appropriate assessment stage.	No
Natural Resources Wales – Sharon Luke	HRA 018	4.1.1. Consideration also needs to be given to Carmarthen Bay Dunes SAC in this section	Agreed and amended as suggested.	No
Natural Resources Wales – Sharon Luke	HRA 019	Appendix 2 The Afon Tywi SAC needs to be included.	The Afon Tywi SAC was originally omitted from this table as there is no information on critical nitrogen loads for any of its features on the Air Pollution Information System website ( <a href="http://www.apis.ac.uk">www.apis.ac.uk</a> ). However, to aid clarity, it has been added with the caveat that no information is available for relevant features.	No
Natural Resources Wales – Sharon Luke	HRA 020	Appendix 4 The section SP18 Mineral Resources is incomplete.	This section has now been updated and policy SP18 has been screened in.	No

## Appendix 5 – Habitat Regulations Assessment Responses to Representations Received

Natural Resources Wales – Sharon Luke	HRA 021	Appendix 5 INF4 Llanelli Waste Water Treatment Surface Water Disposal – We question if the screening justification should only state avoiding not reducing effects.	Agreed. This has been amended as suggested.	No
Natural Resources Wales – Sharon Luke	HRA 022	Appendix 6 Swansea, Pembrokeshire and Pembrokeshire Coast National Park LDP's need to be included.	Agreed. These have been added to Appendix 6.	No
Natural Resources Wales – Sharon Luke	HRA 023	Appendix 6 Lavernock Point to St Ann's Head Shoreline Management Plan 2 (2012) – Carmarthen Bay Dunes to be added.	Agreed and amended accordingly .	No
Natural Resources Wales – Sharon Luke	HRA 024	Appendix 8 The following sites have been screened out in the HRA however we have supplied evidence for why they should be screened in. <ul style="list-style-type: none"> <li>• PrC1/MU2 Pibwrlwyd</li> <li>• PrC1/h12 Castell Pigyn Road, Abergwili</li> <li>• SeC14/h1 Blossom Garage</li> <li>• SeC16/h1 Llandeilo Northern Quarter</li> <li>• SeC16/h2 Thomas Terrace</li> <li>• SeC18/h3 Land adjacent to Cefn Maes</li> <li>• SuV60/h1 Land at College Bach</li> </ul>	Sites have been screened in as per these comments on the evidence supplied in Annex 3. Table 17 in the main HRA document has also been amended to reflect these changes.	No
Pembrokeshire Coast National Park – Martina Dunne	HRA 025	People Over Wind: In April 2018 the Court of Justice of the European Union handed down their judgment in the case of People Over Wind. The court ruled that it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce harmful effects on a European site. It is suggested that the HRA Screening Report should make explicit mention of the judgment and describe how the HRA is incorporating the ruling.	Noted. This reference has now been added in paragraphs 1.3.4 and 1.3.5.	No

## Appendix 5 – Habitat Regulations Assessment Responses to Representations Received

		In our comments on the HRA for the Preferred Strategy we suggested that the People over Wind judgement should be explicitly mentioned. The response in Appendix 7 states that reference to this judgement will be included in the Deposit Plan HRA. We cannot find an explicit mention and therefore repeat the suggestion.		
Pembrokeshire Coast National Park – Martina Dunne	HRA 026	Pembrokeshire Coast National Park Local Development Plan 2: Carmarthen Bay Special Protection Area and Carmarthen Bay and Estuaries Special Area of Conservation adjoin the Pembrokeshire Coast National Park and the Pembrokeshire Coast Local Development Plan is therefore a relevant plan in Appendix 6.	Agreed. This has now been added to Appendix 6.	No
Pembrokeshire Coast National Park – Martina Dunne	HRA 027	SP16 – update reference in column 3 “policy XX”	Amended accordingly	No
Pembrokeshire Coast National Park – Martina Dunne	HRA 028	SP18 – column 4 appears to be incomplete.	Amended accordingly	No
Pembrokeshire Coast National Park – Martina Dunne	HRA 029	“Bosherton” should be replaced by “Bosherston”(table headers in Appendix 1; table in Appendix 2; table in Appendix 6).	Amended accordingly	No
Pembrokeshire Coast National Park – Martina Dunne	HRA 030	“Affects” should be replaced by “effects” where appropriate (para 2.1.1 and 2.3.5).	Amended accordingly	No

**Appendix 5 – Habitat Regulations Assessment  
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Pembrokeshire Coast National Park – Martina Dunne	HRA 031	Para 2.4.1 “20172”	Amended accordingly	No
Pembrokeshire Coast National Park – Martina Dunne	HRA 032	Para 3.1.1 “baring”	Amended accordingly	No
Pembrokeshire Coast National Park – Martina Dunne	HRA 033	Should references to individual screening in “Section 3.2.2” instead refer to paras 3.2.107-3.2.111 and Table 17?	Agreed and amended accordingly .	No



## **Appendix 6      Draft Supplementary Planning Guidance: Burry Inlet. Consultation Report on Responses to the Representations Received**

### **1.0 Overview**

1.1 The Supplementary Planning Guidance (SPG) seeks to provide an elaboration and consolidation of the policies and provisions of the Revised Carmarthenshire Local Development Plan (rLDP) 2018-2033 - Deposit Draft (January 2020), most notably Policy INF4: Llanelli Waste Water Treatment Surface Water Disposal, as well as Policies SP 8: Infrastructure and CCH3: Water Quality and Protection of Water Resources.

1.2 The SPG was made available for consultation between the 29 of January 2020 and the 27 of March 2020.

### **2.0 Responses Received**

2.1 A summary of the comments received, together with responses and any actions in relation thereto, are provided below for Council's attention / ratification as appropriate.

#### **Respondent: R James**

2.2 **Rep ID CT01:** The respondent does not agree that the purpose of the SPG is clear.

2.3 **Officer Response:** Comment noted / disagree. It is considered that the purpose of the SPG is clear in that it seeks to provide specific guidance in relation to the consideration of relevant development proposals located within the Llanelli Waste Water Treatment Works (WwTW) catchment area.

2.4 **Action:** No change to the SPG.

2.5 **REP ID CT02:** The respondent does not agree that all of the relevant legislative and policy content are covered.

2.6 **Officer Response:** Comment noted / disagree. It is considered that Section 2 of the SPG provides a full review of the legislative and policy content.

2.7 **Action:** No change to the SPG.

2.8 **REP ID CT03:** The respondent does not agree that the SPG is appropriately evidenced.

2.9 **Officer Response:** Comment noted / disagree. It is considered that there is sufficient evidence in place. This evidence includes evidence of need for Policy INF4 / the SPG

(confirmation has been attained from a statutory consultee in the form of Dwr Cymru Welsh Water). Further evidence can be shown in terms of growth/development and infrastructural considerations.

2.10 **Action:** No change to the SPG.

**Respondent: S Thomas**

2.11 **Rep ID CT04:** The respondent agrees that the purpose of the SPG is clear.

2.12 **Officer Response:** Support welcomed.

2.13 **Action:** No change to the SPG.

2.14 **REP ID CT05:** The respondent agrees that all of the relevant legislative and policy content are covered.

2.15 **Officer Response:** Support welcomed.

2.16 **Action:** No change to the SPG.

2.17 **REP ID CT06:** The respondent agrees that the SPG is appropriately evidenced.

2.18 **Officer Response:** Support welcomed.

2.19 **Action:** No change to the SPG.

**Respondent: K Mudge**

2.20 **Rep ID CT07:** The respondent does not agree that the purpose of the SPG is clear.

2.21 **Officer Response:** Comment noted / disagree. It is considered that the purpose of the SPG is clear in that it seeks to provide specific guidance in relation to the consideration of relevant development proposals located within the Llanelli Waste Water Treatment Works (WwTW) catchment area.

2.22 **Action:** No change to the SPG.

2.23 **REP ID CT08:** The respondent does not agree that all of the relevant legislative and policy content are covered.

2.24 **Officer Response:** Comment noted / disagree. It is considered that Section 2 of the SPG provides a full review of the legislative and policy content.

2.25 **Action:** No change to the SPG.

2.26 **REP ID CT09:** The respondent does not agree that the SPG is appropriately evidenced.

2.27 **Officer Response:** Comment noted / disagree. It is considered that there is sufficient evidence in place. This evidence includes evidence of need for Policy INF4 / the SPG (confirmation has been attained from a statutory consultee in the form of Dwr Cymru Welsh Water). Further evidence can be shown in terms of growth/development and infrastructural considerations.

2.28 **Action:** No change to the SPG.

**Respondent: R Norman - Dwr Cymru Welsh Water (DCWW)**

2.29 **Rep ID CT10:** The respondent appreciates and welcomes the opportunity to continue to engage in the Burry Inlet SPG process and offers representations for the LPA's consideration. (general comment)

2.30 **Officer Response:** Comment noted and support welcomed.

2.31 **Action:** No change to the SPG.

2.32 **Rep ID CT11:** The respondent has welcomed the discussions that have taken place between the Local Planning Authority and DCWW in the moving away from the previous Memorandum of Understanding (MoU) arrangement to the current proposal in expressing the sentiment of the MoU as a planning policy requirement in the LDP, with a supporting SPG. (general comment)

2.33 **Officer Response:** Comment noted and support welcomed.

2.34 **Action:** No change to the SPG.

2.35 **Rep ID CT12:** The respondent states “*As has been discussed, owing to the sewerage network within the Llanelli WwTW catchment being of a predominantly combined nature the requirement for compensatory surface water removal to allow new foul flows is required to ensure that the network and WwTW does not become hydraulically overloaded and the frequency of spills from CSOs does not increase*”. (general comment)

2.36 **Officer Response:** Comment noted.

2.37 **Action:** No change to the SPG.

2.38 **Rep ID CT13:** The respondent states that “*With particular regard to paragraph 1.4, given that the Water Framework Directive’s principle of preventing deterioration of water quality remains in place, there remains a requirement to remove compensatory surface water to enable new development to connect; as there are four organisations “signed-up” to compensatory surface water removal, we would welcome reference to this as the current wording reads that the matter is one that only concerns DCWW*”.

2.39 **Officer Response:** Agreed. Reference should also be made to the proposed focused changes to the Revised LDP itself.

2.40 **Action:** Amend paragraph 1.4 of the SPG to include reference to the four partner organisations (i.e. Dwr Cymru Welsh Water, Natural Resources Wales, Carmarthenshire County Council and the City and County of Swansea).

2.41 **Rep ID CT14:** The respondent states “*At paragraph 6.8, we would suggest that the wording from “...then developers...” to “...a DCWW scheme...” is amended to read “...the developers can work collaboratively with DCWW to identify and establish a scheme...”*”

2.42 **Officer Response:** Agreed.

2.43 **Action:** Amend paragraph 6.8 in accordance with the comment of the respondent.

2.44 **Rep ID CT15:** The respondent states “*For clarity purposes, we would suggest the removal of the first line of paragraph 6.11 as this is not helpful or positive. (This is re backup schemes).*”

2.45 **Officer Response:** Agreed.

2.46 **Action:** Amend paragraph 6.11 in accordance with the comment of the respondent.

2.47 **Rep ID CT16:** The respondent states “*A point of clarification at paragraph 7.1 – should the wording not be “SPG” rather than “statement of common ground”?*”

2.48 **Officer Response:** Agreed in part.

2.49 **Action:** Include reference to the statement of common ground as a statement of confirmation on behalf of the signatories to the content of the SPG.

2.50 **Rep ID CT17:** The respondent states “*With regard to Table 1 – Guidance for Peak Foul Flows – Other, we can advise that whilst these figures are accurate as per our current Process Specification, we are in the process of updating this document and these figures will likely be amended to be in line with the British Water Flow & Load Code of Practice. As such, we would suggest that the SPG is monitored alongside the policy as this will allow these figures to be updated accordingly.*”

2.51 **Officer Response:** Comment noted. The Council will seek to respond and monitor as appropriate.

2.52 **Action:** No change to the SPG.

2.53 **Rep ID CT18:** The respondent states “*Please also refer to our comment on the specific policy within our LDP representation*”. (general comment)

2.54 **Officer Response:** Comment noted. Reference should be made to the Council’s response to those representations made on the Plan itself and the focused changes proposed. Where relevant, there will be focused changes that will lead to consequential amendments to the SPG also.

2.55 **Action:** No change to the SPG.

**Respondent: S Luke - Natural Resources Wales (NRW)**

2.56 **Rep ID CT19:** With reference to Paragraph 3.10, the respondent states “*This states that NRW will consult on developments brought forward for planning. We assume it should read will be consulted*”

2.57 **Officer Response:** Agreed – this was a typographical error.

2.58 **Action:** Amend paragraph 3.10 to read as follows: “NRW ~~will consult~~ **will be consulted** on developments brought forward for planning to ensure they comply with the appropriate Welsh Government policy on flooding and flood protection”.

2.59 **Rep ID CT20:** A representation in support for Policy INF4 is registered against the Plan itself, however that representation did also state support for the “*supporting Burry Inlet SPG*” in addition and as such this will also be noted as a representation in respect of the consultation on the SPG.

2.60 **Officer Response:** Comment noted and support welcomed.

2.61 **Action:** No change to the SPG.

### **Respondent: Officer / Council**

2.62 Further to feedback received from internal partners in relation to paragraph 6.12, it is recommended to add the words **‘or landowner’** into the paragraph. It is considered that this addition would provide added clarity around matters of Council land interests and the betterment bank exception.

2.63 **Action:** Amend the SPG so that the first sentence of paragraph 6.12 reads as follows: “6.12 *In all instances where Carmarthenshire County Council is the applicant **‘or landowner’** for planning permission for a relevant development as defined within this SPG, Carmarthenshire County Council will be required to submit a drainage report which fully details the feasibility of on site or adjacent to site removal (stage 1 of the sequential search)”.*

2.64 This change will lead to consequential amendments to the SPG being made – notably to the Betterment Bank section, as well as the Revised LDP itself (refer to list of proposed focused changes).

### **3.0 General Matters**

3.1 It should be noted that there may be consequential amendments to the SPG not listed above which may be a result of the Council’s responses to representations made on the deposit LDP itself (notably any representations to policy INF4).

3.2 The Council will undertake any minor editorial amendments / corrections as and where required. (note a slight amendment to paragraph 1.10 was made by officers when the deposit Revised LDP itself was subject to a further 3-week consultation).

3.3 Also, reference should always be made to the proposed focused changes of the Plan itself and it should be noted that the SPG is an evolving document in this regard.

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## **Appendix 7      Draft Supplementary Planning Guidance: Caeau Mynydd Mawr. Consultation Report on Responses to the Representations Received**

### **1.0 Overview**

1.1 The Supplementary Planning Guidance (SPG) seeks to provide an elaboration and consolidation of the policies and provisions of the Revised Carmarthenshire Local Development Plan (rLDP) 2018-2033 - Deposit Draft (January 2020), most notably Policy NE4: Development within the Caeau Mynydd Mawr SPG Area.

1.2 The SPG was made available for consultation between the 29 of January 2020 and the 27 of March 2020.

### **2.0 Responses Received**

2.1 A summary of the comments received, together with responses and any actions in relation thereto, are provided below for Council's attention / ratification as appropriate.

#### **Respondent : D Rees - Butterfly Conservation**

2.2 **Rep ID CMM01:** The respondent agrees that the purpose of the SPG is clear.

2.3 **Officer Response:** Support welcomed.

2.4 **Action:** No change to the SPG.

2.5 **REP ID CMM02:** The respondent agrees that all of the relevant legislative and policy content are covered.

2.6 **Officer Response:** Support welcomed.

2.7 **Action:** No change to the SPG.

2.8 **REP ID CMM03:** The respondent agrees that the SPG is appropriately evidenced.

2.9 **Officer Response:** Support welcomed.

2.10 **Action:** No change to the SPG.

**2.11 REP ID CMM04:** The respondent states that “*Since its inception in 2013 this project has been successful in mitigating the impacts of development in the Cross Hands area on the protected Marsh Fritillary butterfly and the habitat which supports it. The project provides vital funding for work which improves the habitat for the butterfly. The Special Area of Conservation that lies at the centre of a wider area sustains one of Wales’, if not the UK’s, most important Marsh Fritillary meta populations. The butterfly functions in a meta-population – a group of local (smaller) populations connected by migrating individuals. The Marsh Fritillary requires large areas of continuous or closely connected marshy grassland in order to survive in the long term. The food plant on which the eggs are laid, and on which larvae feed is devil’s bit scabious (Succisa pratensis), these plants need to be abundant throughout the habitat in order to support the butterfly. While the Marsh Fritillary population in and around the Caeau Mynydd Mawr SAC is one of the most important in the United Kingdom it is still threatened by loss of habitat as a result of development, and also by the deterioration in the condition of its habitat due to inappropriate management. The continuation of the project is vital to the survival of this species in Wales. As the leading UK and international organisation for butterfly conservation we whole-heartedly support the new Caeau Mynydd Mawr SPG. It can only deliver even better results for both the species and the communities within*”. (general comment)

**2.12 Officer Response:** Comment noted / support welcomed.

**2.13 Action:** No change to the SPG.

**Respondent : R Killa - The Wildlife Trust of South and West Wales**

**2.14 Rep ID CMM05:** The respondent agrees that the purpose of the SPG is clear.

**2.15 Officer Response:** Support welcomed.

**2.16 Action:** No change to the SPG.

**2.17 REP ID CMM06:** The respondent agrees that all of the relevant legislative and policy content are covered.

**2.18 Officer Response:** Support welcomed.

**2.19 Action:** No change to the SPG.

2.20 **REP ID CMM07:** The respondent agrees that the SPG is appropriately evidenced.

2.21 **Officer Response:** Support welcomed.

2.22 **Action:** No change to the SPG.

2.23 **REP ID CMM08:** The respondent states that “*The Caeau Mynydd Mawr project is a fantastic example of where development can improve habitat conditions to benefit wildlife over a landscape scale area. Without the project, one of the most important strongholds of the endangered Marsh fritillary butterfly in the UK would be under threat. I fully support the increase in the project area, as it is based on sound data collated over numerous surveys. It realistically reflects the habitat needed by the Caeau Mynydd Mawr metapopulation.*”

(general comment)

2.24 **Officer Response:** Comment noted / support welcomed.

2.25 **Action:** No change to the SPG.

### **Respondent :S Philippart**

2.26 **Rep ID CMM09:** The respondent does not agree that the purpose of the SPG is clear.

2.27 **Officer Response:** Comment noted / disagree. It is considered that the purpose of the SPG is clear in that it seeks to provide specific guidance in relation to the consideration of development proposals impacting upon the Caeau Mynydd Mawr Special Area of Conservation (SAC).

2.28 **Action:** No change to the SPG.

2.29 **REP ID CMM10:** The respondent does not agree that all of the relevant legislative and policy content are covered.

2.30 **Officer Response:** Comment noted / disagree. It is considered that Section 2 of the SPG provides a full review of the legislative and policy content.

2.31 **Action:** No change to the SPG.

2.32 **REP ID CMM11:** The respondent does not agree that the SPG is appropriately evidenced.

2.33 **Officer Response:** Comment noted / disagree. It should be noted that 3 evidence papers were made available to support the consultation on the SPG. It is considered that these papers fully evidence the following key facets which underpin the SPG in evidential terms: (1) the delineation of the SPG Area; (2) the calculation of the contribution sum to be levied; and (3) the habitat management specifications and quantification of success.

2.34 **Action:** No change to the SPG.

2.35 **REP ID CMM12:** The respondent states that “*I have had land within Black lion road for several years and there has been development all around plus had planning on it previously but had expired now in conservation area*” (general comment)

2.36 **Officer Response:** Comment noted. The SPG area has been robustly defined – see reference to evidence supporting the SPG in the response to representation Rep ID CMM 11 in paragraph 2.33 above. It should be noted that the Caeau Mynydd Mawr SPG Area is not termed a ‘Conservation Area’.

2.37 **Action:** No change to the SPG.

**Respondent : L Wilberforce - Wildlife Trust South & West Wales**

2.38 **Rep ID CMM13:** The respondent agrees that the purpose of the SPG is clear.

2.39 **Officer Response:** Support welcomed.

2.40 **Action:** No change to the SPG.

2.41 **REP ID CMM14:** The respondent agrees that all of the relevant legislative and policy content are covered.

2.42 **Officer Response:** Support welcomed.

2.43 **Action:** No change to the SPG.

2.44 **REP ID CMM15:** The respondent agrees that the SPG is appropriately evidenced.

2.45 **Officer Response:** Support welcomed.

2.46 **Action:** No change to the SPG.

2.47 **REP ID CMM16:** The respondent states “*full support*”. (general comment)

2.48 **Officer Response:** Comment noted / support welcomed.

2.49 **Action:** No change to the SPG.

**Respondent : A Martin**

2.50 **Rep ID CMM17:** The respondent agrees that the purpose of the SPG is clear and states that “*It is important that this area is preserved as it contains grade 1 farmland and natural marsh areas. All of which provide biodiversity and flood constrains. As well as a natural barrier to the villages.*”

2.51 **Officer Response:** Support welcomed.

2.52 **Action:** No change to the SPG.

2.53 **REP ID CMM18:** The respondent agrees that all of the relevant legislative and policy content are covered – adding - “*As far as my knowledge goes!*”.

2.54 **Officer Response:** Support welcomed.

2.55 **Action:** No change to the SPG.

2.56 **REP ID CMM19:** The respondent agrees that the SPG is appropriately evidenced.

2.57 **Officer Response:** Support welcomed.

2.58 **Action:** No change to the SPG.

2.59 **REP ID CMM20:** The respondent states “*We need to consider our actions under the future generations and Welsh planning acts. To ensure the prosperity and enjoyment of Wales for the future*” (general comment)

2.60 **Officer Response:** Comment noted.

2.61 **Action:** No change to the SPG.

**Respondent: S Luke - Natural Resources Wales (NRW)**

2.62 **Rep ID CMM21:** The respondent states “*NE4: Development within the Caeau Mynydd Mawr SPG Area - we support the inclusion of this policy and the supporting SPG*”. (Note this was also registered as a comment in support of the Plan itself (Policy NE4) by the Council).

2.63 **Officer Response:** Support welcomed.

2.64 **Action:** No change to the SPG.

**3.0 General Matters**

3.1 It should be noted that there may be consequential amendments to the SPG not listed above which may be a result of the Council’s responses to representations made on the deposit LDP itself (notably any representations to policy ENV4).

3.2 The Council will undertake any minor editorial amendments / corrections as and where required. (note a slight amendment to paragraph 1.12 was made by officers when the deposit Revised LDP itself was subject to a further 3-week consultation).

3.3 Also, reference should always be made to the proposed focused changes of the Plan itself and it should be noted that the SPG is an evolving document in this regard.

## Appendix 8 - Schedule of Focused Changes: Written Statement

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications		
					Representation	Council Change	HRA	SA/SEA	
<b>Chapter 3: Influences on the Plan</b>									
FCWS/1		Para 3.6	<p>Insert the following additional sentence at the end of the paragraph:            'Regard has also been had to the South West Wales Area Statement (SWWAS). The Statement was produced in 2020 against a backdrop of the Welsh Government's declaration of a climate and a nature emergency. These two issues are interrelated and are in themselves symptoms of the unsustainable management of natural resources. They require a whole systems approach, and as such both issues feature across all the SWWAS themes of:</p> <ul style="list-style-type: none"> <li>• Reducing health inequalities</li> <li>• Ensuring sustainable land management</li> <li>• Reversing the decline of, and enhancing, biodiversity</li> <li>• Cross-cutting theme: Mitigating and adapting to a changing climate.'</li> </ul>	To reflect the importance of the new Area Statement, and to ensure that the Plan adequately reflects the identified priorities.		✓	No implications for the HRA	No significant change. Inclusion of a policy document that more fully aligns the Plan with the SA objectives.	
<b>Chapter 9: A New Strategy</b>									
FCWS/2		Para 9.19	<p>Amend paragraph 9.19 to read as follows.</p> <p>"The plan will seek to control the scale, or rate of growth to ensure the impacts on the local infrastructure and the vitality of the Welsh Language are satisfactorily absorbed and mitigated. The Plan will also seek to protect and enhance the countryside and the natural environment."</p>	To provide a consistent interpretation of the legislation of protecting and enhancing the natural environment	3156		No implications for the HRA	No significant change. Amendment to text for greater alignment with environmental legislation and objectives of the SA.	

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
FCWS/3		Para 9.29	<p>Insert the following before the last sentence: 'Following the Welsh Government's target of becoming a carbon neutral public sector by 2030, in 2019 Carmarthenshire County Council declared a climate emergency and committed to transitioning to a carbon neutral local authority by 2030.</p> <p>Also consequential amendment to the last sentence to read as follows: 'As part of this agenda the Plan will play its part in tackling the causes and effects of climate change reflecting the contribution of the planning system as a whole.'</p>	In order to reflect the declaration of a climate emergency and the commitment made to address this.		✓	No implications for the HRA	No significant change. Wording change that provides new information. The change is likely to support the SA objectives.
FCWS/4		Para 9.37	Amend paragraph 9.37 to include the words 'Community growing spaces' before the word 'allotments'.	In response to a representation. To improve the interpretation of the Plan.	4580	✓	No implications for the HRA	No significant change. Minor change to wording where meaning is the same. No change to the SA
<b>Chapter 10: The Clusters</b>								
FCWS/5	Chapter 10	Paragraph 10.22	<p>Insert the following at the end of paragraph 10.22:</p> <p>"Newcastle Emlyn and Llanybydder are recognised as Urban and Rural Service Centres in the Ceredigion Local Development Plan 2007-2022."</p>	In response to a representation and to reflect the importance of the cross-border relationship.	4587		No implications for the HRA	No significant change. Wording change that provides new information. The change remains consistent with the SA.
<b>Chapter 11: Policies</b>								
FCWS/1282		New Policy	New policy to be inserted for rural allocations which fall outside the catchment of the public sewerage system.	Seeking a new policy for rural allocations which fall outside the catchment of the public sewerage system we would advise that your	3810		No implications anticipated for the HRA. To be reviewed	No significant change anticipated. To be reviewed.



Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
			The new policy would seek to assure that the allocation in its entirety utilises one private system as proliferation of private plants can cause environmental problems.	Authority consider the allocation in its entirety utilising one private system as proliferation of private plants can cause environmental problems. This is a topic area that needs to be accounted for in the written statement given the dynamics of the county.				
<b>Strategic Policy – SP1: Strategic Growth</b>								
FCWS/ 7		SP1	Amend criterion b of Policy SP1 to “A minimum of 76.38ha of allocated employment land.”	Consequential amendment resulting from the reduction in size of two employment allocations in Cross Hands		✓	No implications for the HRA	Possible negative effect to be recorded in the SA. To be reviewed
FCWS/ 8		SG1	<p>Allocate new mixed-use site (PrC2):</p> <p>Site description as follows:  <b>“YMCA Building, Stepney Street, Llanelli Town Centre</b>  <i>A mix of uses at a town centre location, with an allowance for 8 residential units”</i></p> <p>Consequential inclusion in policy HOM1 – Housing Allocations and Appendix 7 for 8 residential units.</p> <p>Total Affordable Units in Plan period to read: 8 (HOM1 – Housing Allocations)</p> <p>Trajectory: Delivery of the 8 units in 2022/23 (Appendix 7)</p> <p>Refer to FCM/ PrC2/b in the Schedule of Focused Changes: Proposals Maps</p>	<p>To reflect planning application progress and the corporate emphasis / investment in Llanelli Town Centre.</p> <p>To reflect planning reference: PL/00673.</p>		✓	No implications for the HRA conclusions. Amend site allocation in HRA where necessary.	Assessment to be captured via the SA of sites. Include new site allocation in SA where necessary.

Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
FCWS/9		SG1	<p>Amend / reduce the allocated site area of PrC2/MU2 to exclude an area of woodland to the west of the site.</p> <p>Consequential deletion of site from policy HOM1 – Housing Allocations and Appendix 7 (deletion of 35 units).</p> <p>Amended site description to read as follows:  <b>“Trostre Gateway, Llanelli:</b>  Mix of uses reflecting its prominent location and planning history”.</p> <p>Refer to FCM/ PrC2/c in the Schedule of Focused Changes: Proposals Maps</p>	In response to a representation from a statutory consultee.	3581 (agreed in part)		Possible positive effect to be recorded in the HRA. To be reviewed.	Possible positive effect to be recorded in the SA. To be reviewed.
FCWS/10		SG1	<p>Allocate new site into the SG1 – mixed use table</p> <p>Site Description as follows:</p> <p><b>Laugharne Holiday Park:</b> Mix of uses focused on tourism and leisure proposals and associated with the re-development of Laugharne Holiday Park.</p>	To reflect the re-development on the site and in response to a representation	4127		No implications for the HRA conclusions. Include new mixed-use site allocation in HRA where necessary.	Assessment to be captured via the SA of sites. Include new mixed-use site allocation in SA where necessary.
FCWS/11		SG1	<p>Allocate new site into the SG1 – regeneration and mixed-use site table</p> <p>Site Description as follows:</p> <p><b>Nant y Caws Regeneration and Mixed-Use Site:</b>  A strategically positioned site already utilised for the sustainable management of waste. It offers the future opportunity to potentially harness energy from waste, and related</p>	Partly in response to a representation and to reflect the strategic importance of this site for continued sustainable waste management and related employment uses.	4370		Include new site allocation in HRA where necessary.	Assessment to be captured via the SA of sites. Include new site allocation in SA where necessary.

Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications		
					Representation	Council Change	HRA	SA/SEA	
			employment-based activities. Future opportunities could be set out through the development of a masterplan for the site.						
FCWS/ 12		SG2	Removal of Nantycaws Waste Management Site from this Policy and its subsequent coverage under Policy SG1: Regeneration and Mixed-Use Sites.	Partly in response to a representation and to reflect the strategic importance of this site for continued sustainable waste management and related employment uses.	3996		No implications for the HRA. Amend site allocation in HRA where necessary.	No significant change. Amend site allocation in SA where necessary.	
FCWS/ 13		Para 11.17	Insertion of the following additional bullet point: 'CCH5: Renewable and Low Carbon Energy in New Developments'	To ensure the Plan makes appropriate provision for renewable and low carbon energy in new developments.		✓	No implications for the HRA	No significant change. Inclusion of the policy ensures that the Plan more fully aligns with the SA.	
FCWS/ 14		Para 11.18	Amend the last sentence of paragraph 11.18 as follows:  "In the event that the allocated sites (identified under policies HOM1, EME1 and EMP5) fail to contribute as expected to the delivery of the Plan's strategy, then the decision to utilise a Reserve Site will be made as part of a formal plan review."	In response to a representation from a statutory consultee.	3867		No implications for the HRA	No significant change. Change in wording to provide procedural clarity.	
<b>Strategic Policy – SP2: Retail and Town Centres</b>									
FCWS/ 15 Page 1285		Policy SP2	Replace criterion a) of Policy SP2 with the following:  "Proposals for retail and other appropriate town centre uses, (including leisure, civic, cultural, education, business, health and residential (upper floors)) which support the	To respond to the impacts arising from Covid-19 on the Retail Town Centre and to reflect national policy objectives.		✓	No implications for the HRA	Change in wording to allow for adaptive measures in town centres. The change is consistent with the SA	

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
			<p>growth of Carmarthen as a sub-regional retail town centre will be permitted where they maintain and enhance the vitality, viability and attractiveness of Carmarthen Town Centre. Proposals should not:</p> <p>1) undermine the retail function of the centre, or have a detrimental effect upon the vitality or viability of the area; and</p> <p>2) create a concentration of non-retail ground floor frontage detrimental to the retail character and function of the area.”</p>					objectives. Possible positive benefit to be recorded in the SA. To be reviewed.
FCWS/16		Policy SP2 Para 11.29	<p>Amend paragraph 11.29 to include the following at the end of the paragraph:</p> <p>“The policy, however, also seeks to recognise the impact of Covid-19 and changing in shopping patterns has had on our high streets and within town centres. In this respect the policy seeks to reflect the intrinsic retail function whilst recognising a new multifunctional role for such centres.”</p>	To respond to the impacts arising from Covid-19 on the Retail Town Centre and to reflect national policy objectives.		✓	No implications for the HRA	Change in wording to reflect the impact of Covid-19, and consumer trends on the town, and to allow for adaptive measures. The change is consistent with the SA objectives. Possible positive benefit to be recorded in the SA. To be reviewed.

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
FCWS/17		Policy SP2 Para 11.34	<p>Replace paragraph 11.34 with the following:</p> <p>“Carmarthen has a longstanding sub-regional role and has traditionally had a strong national presence on its high street as well as a variety of local stores. The nature of its retail offer has however been notably impacted by Covid-19 with a number of the national operators having withdrawn in light of the financial challenges and realignment within the retail sector. Consequently whilst the centre does and will continue to serve a range of needs for the population beyond its local community the nature of its offer and the range of uses within the traditional retail core must be adaptive whilst retaining that traditional retail base. The centre continues to be readily characterised as a higher order retail centre by the provisions above.”</p>	To respond to the impacts arising from Covid-19 on the Retail Town Centre and to reflect national policy objectives.		✓	No implications for the HRA	Change in wording to reflect the impact of Covid-19 on the town centre, and to allow for adaptive measures. The change is consistent with the SA objectives. Possible positive benefit to be recorded in the SA. To be reviewed.
FCWS/18		Policy SP2 Para 11.35	<p>Amend paragraph 11.35 to include the following at the end of the paragraph:</p> <p>“Further LDO’s are being prepared for Carmarthen and Ammanford Town Centres as part of regeneration initiatives to aid in the Covid-19 recovery. The future role of these and the Llanelli Town Centre LDO will be further considered as tools to assist in the implementation of this Revised LDP.”</p>	To respond to the impacts arising from Covid-19 on the Retail Town Centre and to reflect national policy objectives.		✓	No implications for the HRA	Change in wording to reflect the impact of Covid-19 on town centres, and to allow for adaptive measures. To be reviewed.

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
FCWS/19		Policy SP2 Para 11.37	<p>Insert the following sentence at the end of paragraph 11.37 under policy SP2:</p> <p>“Regard will be had to the implications proposals for new convenience stores outside of the identified High, Mid and Lower Order centres (defined within the Policy) will have on defined retail centres within neighbouring authorities. Proposals which may have an adverse impact should be accompanied by a robust retail assessment.”</p>	In response to a representation and to ensure the Plan makes appropriate provision for cross border implications.	4589		No implications for the HRA	No significant change to the SA. Inclusion of additional detail and clarification. No change to the SA conclusions.
FCWS/20		Policy SP2 New Para Supporting text	<p>Insert the following new paragraphs into the supporting text of Policy SP2:</p> <p>“This Revised LDP seeks to strike a balance between protecting the overall retail character of the town centres and providing for an appropriate diversity of uses which reflects their position within the hierarchy. In so doing, it is recognised that its character and identity is augmented by the presence of independent traders traditionally operating from the more peripheral streets and in locations and that can be susceptible to competition. It is however recognised that diversification enables other beneficial, economic uses to complement the retailing presence and to maintain the physical fabric</p>	<p>To respond to the impacts arising from Covid-19 on the Retail Town Centre and to reflect national policy objectives.</p> <p>To relocate and revise wording previously contained within the supporting text for Policy RTC1.</p>		✓	No implications for the HRA	Relocation and revision of wording, and to reflect the impact of Covid-19 on the town centre, and to allow for adaptive measures. The change is consistent with the SA objectives. Possible positive benefit to be recorded in the SA. To be reviewed.

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
			<p>and appearance of streets and buildings which may otherwise be susceptible to decline.</p> <p>The potential for appropriate diversification within the town centres enabled through this policy, recognises their contribution to increasing its overall attractiveness. The introduction of complementary retail, leisure and business offers etc can contribute to a broader appeal, nevertheless, the policy recognises the importance of a strong retail element and seeks to maintain the vitality and viability of the towns retail offer.”</p>					
FCWS/21		Policy RTC1	<p>Delete Policy RTC1 and its supporting text.</p> <p>Consequential amendment to cross references within the Plan to reflect deletion of policy and amendment to SP2 criterion a).</p>	To respond to the impacts arising from Covid-19 on the Retail Town Centre and to reflect national policy objectives.		✓	No implications for the HRA	No significant change. Deletion of text to avoid duplication, and consequential amendments.
<b>Strategic Policy – SP3: A Sustainable Approach to Providing New Homes</b>								
FCWS/22		HOM1	<p>Include the following within HOM1: “Adj Tyle Teg, Llysonnen Road” for 7 dwellings, and consequential amendment to Appendix 7.</p>	To reflect a site that is currently under construction		✓	No implications for the HRA.	No significant change. Assessment already captured via the SA of sites.
FCWS/23		HOM1	<p>Reduce the allocated figure of SuV3/h1 from 19 to 16 units.</p> <p>Consequential amendment to appendix 7</p>	To reflect the planning permission		✓	No implications for the HRA.	No significant change. Assessment already captured

Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
								via the SA of sites.
FCWS/ 24		HOM1	Increase allocated figure for allocation PrC2/h2 to 15 units (increase of 5 units).  Amend Total Affordable Units in Plan period to read: 3.  Consequential amendment to Appendix 7	To reflect planning reference: PL/00588.	3677	✓	No implications for the HRA	No significant change. Assessment already captured via the SA of sites.
FCWS/ 25		HOM1	In regards site PrC2/h5 amend the Total Affordable Units in Plan period to read: 35.	To reflect the feedback received from the landowner.		✓	No implications for the HRA	No significant change. Assessment already captured via the SA of sites
FCWS/ 26		HOM1	Delete allocation PrC2/h8.  Consequential deletion from Appendix 7.  Site to be retained within development limits due to its position in the urban form.  Refer to FCM/ PrC2/d in the Schedule of Focused Changes: Proposals Maps	To reflect the fact that planning permission S/40455 contains four c3 use class units and the site should not therefore be allocated.		✓	Deletion of housing allocation from HRA. No implications for the HRA conclusions.	Deletion of housing allocation from SA. No implications for the SA conclusions
FCWS/ 27		HOM1	Increase allocated figure for allocation PrC2/h19 to 270 units (increase of 10 units).  Amend Total Affordable Units in Plan period to read: 53.1  Consequential amendment to Appendix 7.	To reflect the remaining developable area of the site and following feedback received from site proponent / landowner / potential developer.	4395	✓	No implications for the HRA	No significant change. Assessment already captured via the SA of sites.
FCWS/ 28		HOM1	Allocate new site at Llwynhendy Road, Llanelli (PrC2) for 13 units.	To reflect planning reference: PL/00179.		✓	No implications for the HRA conclusions.	Assessment to be captured via the SA of sites.



Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
			<p>Total Affordable Units in Plan period to read: 1.3 units.</p> <p>Consequential inclusion in Appendix 7 as per the below: 7 units in 2021/2022 and 6 units in 2022-2023.</p> <p>Refer to FCM/ PrC2/e in the Schedule of Focused Changes: Proposals Maps</p>	<p>Progress is being made in bringing the site forward and the Council's previous concerns on the retention of this Adopted LDP allocation (deliverability) have been addressed.</p>			<p>Include new site allocation in HRA where necessary.</p>	<p>Include new site allocation in SA where necessary.</p>
FCWS/29		HOM1	<p>Allocate new site at Caegar, Bryn (PrC2) for 20 units.</p> <p>Total Affordable Units in Plan period to read: 20.</p> <p>Consequential inclusion in Appendix 7 as per the below: 20 units in 2021/2022.</p> <p>Refer to FCM/ PrC2/f in the Schedule of Focused Changes: Proposals Maps</p>	<p>To reflect the fact that the Pre-Application Consultation is completed and the confidence in deliverability (social housing provider). The Council's previous concerns on the retention of this parcel of land as part of a wider allocation (deliverability) have been addressed.</p> <p>Refer to planning reference: PL/00851</p>		✓	<p>No implications for the HRA conclusions. Include new site allocation in HRA where necessary.</p>	<p>Assessment to be captured via the SA of sites. Include new site allocation in SA where necessary.</p>
FCWS/30		HOM1	<p>Delete allocation Sec6/h5.</p> <p>Consequential deletion from Appendix 7.</p> <p>Site to be retained within the development limits due to its position in the urban form.</p> <p>Refer to FCM/ Sec6/a in the Schedule of Focused Changes: Proposals Maps</p>	<p>Whilst the allocation of the site was in accordance with the Site Assessment Methodology – feedback post publication of the deposit Plan has led to a lack of confidence in the site's deliverability. Reference can be made to the Council's response to representation reference number 3345 within the report of representations to the deposit LDP – policy HOM1 – Housing Allocations – site Sec6/h5.</p>		✓	<p>No implications for the HRA. Delete site allocation in HRA where necessary.</p>	<p>No significant change. Delete site allocation in SA where necessary.</p>

Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
FCWS/ 31		HOM1	Reduce allocated figure for allocation SeC7/h4 to 30 units (reduction of 5 units).  Amend Total Affordable Units in Plan period to read: 5.1  Consequential amendment to Appendix 7.	To reflect planning reference: PL/00470	3801	✓	No implications for the HRA. Amend site allocation in HRA where necessary.	No significant change. Amend site allocation in SA where necessary.
FCWS/ 32		HOM1	Increase site area of allocation SeC7/h5 and increase allocated figure to 7 units.  Amend Total Affordable Units in Plan period to read: 7.  Consequential amendment to Appendix 7.  Refer to FCM/ SeC7/a in the Schedule of Focused Changes: Proposals Maps	To reflect the developable area and feedback received from the landowner.		✓	No implications for the HRA.	No significant change. Assessment already captured via the SA of sites.
FCWS/ 33		HOM1	Reduce allocated figure for site SuV23/h1 to 16 units (reduction of 4 units).  Consequential amendment to Appendix 7.	To reflect planning reference: S/40024	3222		No implications for the HRA.	No significant change. Assessment already captured via the SA of sites.
FCWS/ 34		HOM1	Increase the allocated figure for site PrC3/h13 from 101 to 135 dwellings  Consequential amendment to appendix 7	To reflect the planning permission and to include the 34 dwellings built during the period 2018-2019.		✓	No implications for the HRA.	No significant change. Assessment already captured via the SA of sites.
FCWS/ 35		HOM1	Decrease the allocation of PrC3/h23 from 15 to 13.  Consequential amendment to appendix 7	To take into account the 2 dwellings built outside the plan period.		✓	No implications for the HRA.	No significant change. Assessment already captured

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
								via the SA of sites.
FCWS/36		HOM1	Decrease the allocation of PrC3/h24 from 11 to 7.  Consequential amendment to appendix 7	To take into account the 4 dwellings built outside the plan period.		✓	No implications for the HRA.	No significant change. Assessment already captured via the SA of sites.
FCWS/37		HOM1	Increase the allocated figure for site PrC3/h32 from 62 to 72 dwellings  Consequential amendment to appendix 7	To reflect the planning permission and the correspondence from landowner		✓	No implications for the HRA.	No significant change. Assessment already captured via the SA of sites.
FCWS/38		HOM1	Include the following within HOM1: "Llys Dolgader, Ammanford" for 9 dwellings and consequential amendment to Appendix 7	To reflect a site that's currently under construction		✓	No implications for the HRA.	No significant change. Assessment already captured via the SA of sites.
FCWS/39		HOM1	Increase the allocated figure for site SeC10/h1 from 9 to 12 dwellings  Consequential amendment to appendix 7	To reflect the planning permissions.		✓	No implications for the HRA.	No significant change. Assessment already captured via the SA of sites.
FCWS/40		HOM1	Amend the total affordable units in Plan period on sites SeC10/h4 from 28 to 2.8 dwellings	To reflect the correct figure.		✓	No implications for the HRA.	No significant change. Assessment already captured via the SA of sites.
FCWS/41		HOM1	Reduce allocated figure for site SuV33/h1 to 5 dwellings (reduction of 3 units), and consequential amendment to Appendix 7.	To reflect developable area and feedback from landowner.	3195, 3372, 3373(?)		No implications for the HRA.	No significant change. Assessment already captured

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
								via the SA of sites.
FCWS/42		HOM1	Increase density of SuV36/h2 to 16 dwellings (increase in 6 dwellings), and consequential amendment to Appendix 7.	To reflect developable area and feedback from landowner.		✓	No implications for the HRA.	No significant change. Assessment already captured via the SA of sites.
FCWS/43		HOM1	Increase the allocated figure for site Sec16/h3 from 5 to 15 dwellings  Consequential amendment to appendix 7	To reflect a more accurate developable number for the site.		✓	No implications for the HRA.	No significant change. Assessment already captured via the SA of sites.
<b>Strategic Policy – SP4: Affordable Homes Strategy</b>								
FCWS/44		AHOM1 Paragraph 11.124	Insert the following new sentence within paragraph 11.124 to recognise PrC1/MU1 affordable housing figure being set at a 12% target:  <i>‘ In relation to West Carmarthen (PrC1/MU1) the affordable percentage target is set at 12% which is in accordance with the agreed terms for the overall mixed use site.</i>	To reflect the mixed-use site’s current position.	3235, 3239, 3840		No implications for the HRA.	No significant change. Inclusion of new information for clarity. No change to the SA required.
<b>Strategic Policy – SP5: Strategic Sites</b>								
FCWS/45		SP5	Amend the first line of paragraph 2 of Policy SP5 to read as follows:  “Pentre Awel, Llanelli (PrC2/SS1);”  Consequential amendment in that the site will be renamed as per the above elsewhere in the Plan.	To reflect the name of the strategic site.		✓	No implications for the HRA.	Amendment to the SA required. No change to the SA conclusion.
<b>Strategic Policy – SP6: Employment and the Economy</b>								

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
FCWS/46		SP6	Amend the allocation figure in the first sentence of Policy SP6 to 76.38 Ha.	Consequential amendment resulting from the reduction in size of two employment allocations in Cross Hands		✓	No implications for the HRA	Possible negative effect to be recorded in the SA. To be reviewed
FCWS/47		Para 11.142	<p>Add the following paragraph before paragraph 11.142:</p> <p>“A report published by the Welsh Government in 2020 to inform the new Property Delivery Plan highlights that while delivery of industrial and office accommodation is generally led by the private sector, there are strong grounds for public sector intervention, including responding to evidence of demand for new or additional capacity, attracting and retaining investment that would not otherwise come an area, or through influencing commercial decisions for example by bringing new economic activity to a redundant site.”</p>	To reflect the latest information published by the Welsh Government.		✓	No implications for the HRA.	No significant change. Inclusion of new information to reflect latest guidance. The change remains consistent with the SA objectives. No change to the SA conclusions.
FCWS/48		Para 11.143	<p>Add the following new sentence at the end of paragraph 11.143:</p> <p>“In noting these 3 Carmarthenshire projects specific to Carmarthenshire, it should be noted that ‘The Homes as Power Stations project’ aims to deliver smart, low carbon, energy-efficient homes through a co-ordinated approach across the City Region , whilst the ‘Digital Infrastructure’ project aims include</p>	To fully reflect the Swansea Bay City Deal context.		✓	No implications for the HRA.	No significant change. Inclusion of new information for clarity. No change to the SA required.

Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
			<p>supporting a thriving digital economy across the City Region.”</p> <p>Consequential footnotes to be added referencing the following:</p> <p><a href="https://www.swanseabaycitydeal.wales/projects/homes-as-power-stations/">https://www.swanseabaycitydeal.wales/projects/homes-as-power-stations/</a></p> <p><a href="https://www.swanseabaycitydeal.wales/projects/digital-infrastructure/">https://www.swanseabaycitydeal.wales/projects/digital-infrastructure/</a></p>					
FCWS/49		Para 11.147	<p>Add the following paragraph after paragraph 11.147:</p> <p>“The Council recognises that there are clearly experiences arising from the Covid 19 pandemic which have big implications for future working practices and the future needs of workspace (confirming the importance of flexibility); In this context, a key area is the importance of high quality communications infrastructure (broadband, mobile reception and ability to future proof/upgrade). This is important for residents and business especially in the context of greater remote working and its role in addressing the peripherality of the rural areas (reference should be made to Policy EME5: Home Working and Policy INF3: Broadband and Telecommunications).”</p>	To reflect the impact of the Covid 19 pandemic.		✓	No implications for the HRA.	Inclusion of additional wording to reflect the impact of Covid-19 on working practices, and to allow for adaptive measures. The change is consistent with the SA objectives. Possible positive benefit to be recorded in the SA. To be reviewed.

Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications		
					Representation	Council Change	HRA	SA/SEA	
FCWS/ 50		Para 11.151	Amend the figures in Table 6 and include the amended Table in Appendix A.	Consequential amendment resulting from the reduction in size of the two employment allocations in Cross Hands.		✓	No implications for the HRA	Amendment to SA where relevant.	
FCWS/ 51		EME3 –	Amend the figures for the following sites in Table 7 as follows:  PrC3/E2 – 6.55 Ha  PrC3/E4 – 0.3 Ha  With a consequential amendment to the overall total to 76.38 Ha	Consequential amendment resulting from the reduction in size of the two employment allocations in Cross Hands.			No implications for the HRA.	Possible negative effect to be recorded in SA. To be reviewed.	
FCWS/ 52		EME5 - Para 11.167	Add the following sentence at the end of paragraph 11.167:  “This has an enhanced importance as a result of the Covid-19 pandemic and the likely implications for future work trends/workspace, as well as the need for reliable super-fast broadband (reference should be made to Policy INF3: Broadband and Telecommunications).”	To reflect the impact of the Covid 19 pandemic.		✓	No implications for the HRA.	Inclusion of additional wording to reflect the impact of Covid-19 on working practices, and to allow for adaptive measures. The change is consistent with the SA objectives. Possible positive benefit to be recorded in the SA. To be reviewed.	
<b>Strategic Policy – SP8: Infrastructure</b>									
FCWS/ 53		SP8	Insert the following new paragraph within the supporting text of Policy SP8:	In response to representation.	3489		No implications for the HRA.	No significant change. Inclusion	

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
		Supporting text new Para	“Reference is made to the preparation of Drainage and Wastewater Management Plans (DWMPs) as prepared by Dwr Cymru Welsh Water. It is anticipated that the DWMPs will compliment the implementation of this LDP through the management of the drainage and sewerage network.”					of new information for clarity, and to reflect new Drainage and Wastewater Management Plans. No change to the SA conclusions required.
FCWS/54		INF3	Amend Policy wording to include the following: “New developments should include the provision of Gigabit capable broadband infrastructure from the outset” after the first paragraph.	To reflect the provisions of the emerging Future Wales: The National Plan 2040 (National Development Framework)		✓	No implications for the HRA.	No significant change. Inclusion of new information for clarity, and to reflect new guidance. No change to the SA required.
FCWS/55		Para 11.197	Include the following wording after ‘change’: “The policy reflects the provisions of Future Wales: The National Plan 2040 which supports the provision of Gigabit capable digital infrastructure into new developments where people are present, for example new housing, business and commercial premises, and public buildings.”	To reflect the provisions of the emerging Future Wales: The National Plan 2040 (National Development Framework)		✓	No implications for the HRA.	No significant change. Inclusion of new information for clarity, and to reflect new guidance. No change to the SA required.
FCWS/55		Para 11.198	Amend the second sentence of para 11.198 to read as follows:  “FTTP shall be provided free of charge to housing developments by BT Openreach based upon their thresholds at that time.”	In the interests of clarity and in response to representation. To ensure the provisions of the Plan remain timely and relevant.	3160	✓	No implications for the HRA.	No significant change. Change in wording for clarity. No change to the SA required.



Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
FCWS/57		INF4	<p>Change the name of Policy INF4 to the following:</p> <p>“Llanelli Wastewater Treatment Works catchment surface water removal”.</p> <p>Undertake any consequential amendment to the Burry Inlet Draft SPG as a result.</p>	In the interests of clarity and in response to representation from statutory consultee.	3494		No implications for the HRA	No significant change. Minor change to policy name for clarity. Consequential amendment to the SA has been made.
FCWS/58		11.202	<p>Insert the word "catchment" in place of the word "area" in the final sentence of paragraph 11.202.</p> <p>Undertake any consequential amendment to the Burry Inlet Draft SPG as a result.</p>	In response to representation from statutory consultee.	3495		No implications for the HRA	No significant change. Minor change to wording. No change to the SA required.
FCWS/59		11.203	<p>Insert the following text at the end of paragraph 11.203:</p> <p>“In noting the specific reference to Dwr Cymru Welsh Water in this paragraph, it should be noted that the consideration of these matters is subject to a multi-agency approach which includes Dwr Cymru Welsh Water, Natural Resources Wales and Carmarthenshire County Council. Also, the City and County of Swansea are included in discussions in regards the Burry Inlet. The Statement of Common Ground will accompany and support the implementation of Policy INF4 and its supporting SPG”.</p> <p>Undertake any consequential amendment to the Burry Inlet Draft SPG as a result.</p>	In response to representation from statutory consultee.	3496		No implications for the HRA	No significant change. Inclusion of new information for clarity. No change to the SA required.
FCWS/60		11.204	<p>Insert the words "combined sewer overflows" in place of the words "storm sewerage"</p>	In response to representation from statutory consultee.	3497		No implications for the HRA	No significant change. Minor

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
			overflows" in the first sentence of paragraph 11.204.  Undertake any consequential amendment to the Burry Inlet Draft SPG as a result.					change to wording for clarity. No change to the SA required.
FCWS/61		11.207	Insert the following text at the end of paragraph 11.207:  "Policy INF4 reflects this partnership approach moving forward. Reference should be made to paragraph 11.203 in regards the reference to the Statement of Common Ground."  Undertake any consequential amendment to the Burry Inlet Draft SPG as a result.	To provide clarity and as a cross referencing aid.		✓	No implications for the HRA	No significant change. Inclusion of additional information for clarity. No change to the SA conclusions.
FCWS/62		11.208	Insert the words "or landowner" after the word "applicant" in paragraph 11.208.  Undertake any consequential amendment to the Burry Inlet Draft SPG as a result.	As a result of amendments proposed to the Draft Burry Inlet SPG.		✓	No implications for the HRA	No significant change. Minor change in wording for clarity.
<b>Strategic Policy – SP9: Gypsy and Traveller Provision</b>								
FCWS/63		Para 11.219	Insert new sentence at the end of paragraph 11.219 as follows:  "In the wake of ash dieback, no ash trees should be introduced."	In the interests of clarity and in response to representation from statutory consultee.	<b>3698</b>		No implications for the HRA	No significant change. Reference to new guidance. The SA conclusions remain unchanged.
FCWS/600		GT1	Remove the words "(relating to where the need has been identified)" from criterion 2 of the policy.	contrary to Welsh Government Circular 005/2018 and acts against the freedom of movement for Gypsy	3886		No implications for the HRA	No significant change. Text removed allowing for a

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
				and Travellers who wish to develop their own sites.				less culturally restrictive policy. The SA conclusions remain unchanged.
<b>Strategic Policy – SP10: The Visitor Economy</b>								
FCWS/65		11.247	Delete the following wording from the first sentence of paragraph 11.247:  “substandard modern utilitarian construction (including materials such as single skin concrete block work, portal framed buildings clad in metal sheeting) or buildings of”  Consequential adding of new sentence (i.e. sentence 2) within paragraph 11.247 to read as follows “In this regard, proposals for buildings of a modern construction such as portal framed units or temporary structures will not generally be considered appropriate for conversion to holiday accommodation”.	To facilitate the delivery of high-quality tourism related initiatives.		✓	No implications for the HRA	No significant change. Text removed for greater alignment with policy. The SA conclusions remain unchanged.
FCWS/66		VE4	Insert the following words after the words “they are” in criterion a) of Part 1 of the Policy:  “within or”	In the interests of clarity.		✓	No implications for the HRA	No significant change. Minor change in wording for clarity. No changes to SA required.
<b>Strategic Policy – SP11: Placemaking and Sustainable Places</b>								
FCWS/1301		SP11	Amend criterion c) of policy SP11 to insert the word ‘multifunctional’ before ‘green’.	In the interests of clarity and in response to representation from statutory consultee.	3699	✓	No implications for the HRA	No significant change. Minor change in phrasing for clarity. The

Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
			Also insert the words 'and blue' after the word 'green' within the opening sentence of criterion c).  Consequential amendments to reference to green infrastructure elsewhere in the Plan.			✓		change is consistent with SA phrasing. No changes to SA required.
FCWS/ 68		SP11	Amendment of criterion d). After the words 'contribute towards' replace existing text with 'reducing carbon emissions and maximising opportunities for renewable energy generation'	In the interest of clarity and to align more fully with policy requirements.		✓	No implications for the HRA	No significant change. Minor wording change to provide clarity.
FCWS/ 69		SP11	Insert the words "local landscape context" after the word "existing" in criterion f) under policy SP11.	In the interests of clarity and in response to representation from statutory consultee.	3700		No implications for the HRA	No significant change. Insertion of term to add clarity and reinforce sustainability policy.
FCWS/ 70		11.269	Insert new sentence at the end of paragraph 11.269 as follows:  "The multifunctional nature of green and blue infrastructure is recognised and includes: landscape, heritage, amenity, health and well-being, sustainable management of natural resources, along with climate adaptation and resilience".	In the interest of clarity		✓	No implications for the HRA	No significant change. Minor wording change to provide clarity.
FCWS/ Page 1302		PSD 1 Criterion e) iii)	Amend Criterion e) iii) of policy PSD1 to read as follows:  "iii) retains and protects key features and characteristics and integrates positively with the surrounding landscape and built environment;"	In the interests of clarity and in response to representation from statutory consultee.	<b>3701</b>		No implications for the HRA	No significant change. Minor rewording for clarity. Improves SA benefits through considering requirements of

Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
								the natural environment.
FCWS/ 72		PSD 1 Criterion e) iv) and v)	Insert semi-colon after 'place' in Criterion e) iv).  Insert full stop after 'impacts' in Criterion e) v).	In the interests of clarity and to assist in the interpretation of the policy.		✓	No implications for the HRA	No significant change. Minor rewording for clarity.
FCWS/ 73		PSD 1	Insert the following additional criterion into policy PSD1: 'j) Opportunities for carbon reduction have been considered, including maximising energy efficiency through building design, and renewable energy generation.'	To reiterate carbon reduction policy		✓	No implications for the HRA	No significant change. Reiterates policy and SA objectives, but is not prescriptive on development.
FCWS/ 74		PSD1 Para. 11.285	Amend reference to over 100 homes in the first sentence to over 50 homes.	In the interest of clarity and in accordance with Policy PSD2.	3528		No implications for the HRA	No significant change. Aligns policy with Policy PDS2. Possible positive effect to be recorded in the SA. To be reviewed.
FCWS/ 75		PSD2	Insert new criterion after criterion K as follows:  "l) where significant wildlife interests are associated with the site, it has to be ensured that Green and Blue Infrastructure provides a resilient network, which adequately protects and enhances the respective wildlife interests"  Consequential insertion of semi-colon at the end of criterion k.	In the interests of clarity and in response to representation from statutory consultee.	3702		No implications for the HRA	No significant change. Minor rewording for clarity. Improves SA benefits through considering requirements of the natural environment.
FCWS/ 76		PSD2	Amend criterion j) by inserting the words: 'such as district heat networks' after 'resource efficiency, and before 'low carbon	In order to introduce carbon reduction opportunities for consideration to developers.		✓	No implications for the HRA	No significant change. Minor addition of

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
			development and renewable energy generation’.					wording to reinforce sustainability policy.
FCWS/77		PSD3	<p>Insert the following after the first paragraph in policy PSD3:</p> <p>‘In circumstances where securing wildlife interests are not compatible with other GBI functions, opportunities to achieve multifunctionality should be sought by bringing infrastructure functions together to create a resilient network where appropriate, and where it will not compromise the function of the GBI.’</p>	In the interests of clarity and in response to representation from statutory consultee.	3704		No implications for the HRA	No significant change. Addition of text for clarity. Improves SA benefits through considering requirements of the natural environment. No change to the SA conclusion.
FCWS/78		Para 11.293	<p>Insert new sentence at the end of paragraph 11.293 as per the following:</p> <p>“Where feasible, existing/retained vegetation should be protected throughout the construction period. Where new habitat is being created, the timeline involved for the habitat to become functional should be considered.”</p>	In the interests of clarity and in response to representation from statutory consultee.	3703		No implications for the HRA	No significant change. Minor rewording for clarity. Improves SA benefits through considering requirements of the natural environment.
FCWS/79		PSD3 Para 11.295	Amend paragraph 11.295 to include the words ‘Community growing spaces’ before the word ‘allotments’.	In response to a representation. To improve the interpretation of the Plan.	4580	✓	No implications for the HRA	No significant change. Minor change to wording where meaning is the same. No change to the SA
FCWS/304		Para 11.298	<p><u>Biodiversity section</u></p> <p>Insert the following wording after the second sentence:</p>	In the interests of clarity and in response to representation from statutory consultee.	3705		No implications for the HRA	No significant change. Addition of wording to add clarity and

Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
			<p>'There will be a need for any application to detail how the development will deliver such conservation and enhancement'</p> <p>Replace the word 'should' with 'will' in the 3rd sentence</p>					reinforce sustainability policy. No change to the SA conclusion.
FCWS/ 81		Para 11.298	<p><u>Climate change section</u></p> <p>Under the first bullet point.</p> <p>Replace the words: 'Within flood zones as identified by Natural Resources Wales' with 'Within areas considered to be at risk of flooding from any source'</p>	In the interests of clarity and in response to representation from statutory consultee.	3706		No implications for the HRA	No significant change. Change of wording to for clarity. No change to the SA conclusion.
FCWS/ 82		PSD4	<p>Amend the second sentence of the first paragraph of Policy PSD4 to read as follows:</p> <p>'Proposals should demonstrate a commitment to support delivery of the goals embedded within the South West Wales Area Statement, by retaining existing trees, woodland and hedgerows and, where loss is unavoidable provide appropriate replacement throughout the development.'</p>	In response to representation from statutory consultee.	3709		No implications for the HRA	No significant change. Addition of wording to add clarity and reinforce sustainability policy. No change to the SA conclusion
FCWS/ 83		PSD4	<p>Delete the following wording from the first sentence of the second paragraph of policy PSD4</p> <p>"on site at a rate of two new trees for each tree lost"</p> <p>Insert the following new sentence after the first sentence of the second paragraph of policy PSD4:</p>	To reflect policy direction and in response to representation from statutory consultee.	3710		No implications for the HRA	No significant change. Change of wording to add clarity and reflect current policy. No change to the SA conclusion

Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
			"This requirement will be determined on a case by case basis."					
FCWS/ 84		Para 11.302	Insert the words "long-term and short-term" after the word "Appropriate" in the final sentence of paragraph 11.302.	In the interests of clarity and in response to representation from statutory consultee.	3715		No implications for the HRA	No significant change. Minor rewording for clarity.
FCWS/ 85		PSD4	Insert the following words in the final sentence of fourth paragraph of policy PSD4 after the word "The":  "information provided in the application"  Delete the words "tree survey information" in the final sentence of the fourth paragraph of policy PSD4 after the word "The"	In the interests of clarity and in response to representation from statutory consultee.	3719		No implications for the HRA	No significant change. Minor rewording for clarity.
FCWS/ 86		PSD4	Insert the following wording at the end of the second paragraph of policy PSD4:  "There should be a commitment to maintain the habitat in the long-term. In the wake of ash die back, no ash trees should be introduced"	In the interests of clarity and in response to representation from statutory consultee.	3718 3720		No implications for the HRA	No significant change. Minor change of wording for clarity and reference to new guidance. The SA conclusions remain unchanged.
FCWS/ 87		PSD4 para 11.304	Insert the following words after the first sentence of paragraph 11.304:  "In regards the reference in the policy to unavoidable loss, the Council will expect the applicant to make every reasonable effort to retain existing features, and as such their retention should (where appropriate) be considered integral to the design of the proposed development site from the outset."	In the interests of clarity and in response to representation from consultee.	3535		No implications for the HRA	No significant change. Additional text for clarity.



Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
FCWS/ 88		Policy PSD12	Insert the following new paragraph under policy PSD12: “The Plan recognises the national trend in increased intensive agriculture and densities of livestock. This can lead to increased nutrient loading and increases in ammonia emissions to both air and water. In order to facilitate sustainable consideration of this type of development, proposals must take full account of wastes arising, cumulative impacts, and take full account of water quality (Reference CCH3: Water Quality and Protection of Water Resources) and the effect that this has on priority habitats and species, particularly in relation to those sensitive to increases in ammonia.”	In the interests of clarity and in response to representation from statutory consultee.	3754		No implications for the HRA	No significant change. Addition of wording for clarity and to reinforce environmental legislation. The change remains consistent with the SA objectives. No change to the SA conclusion
FCWS/ 89		Para 11.344	Insert text at the end of the paragraph as follows ‘Consideration should be given to the negative impacts light pollution can have on landscape character and visual amenity.’	In response to representation from statutory consultee.	3724		No implications for the HRA	No significant change. Minor rewording for clarity.
FCWS/ 90		Para 11.347	Insert after the second sentence the following text ‘Any development schemes should incorporate lighting plans that ensure minimal or no light spill on green and blue infrastructure especially linear habitats such as hedgerows, woodland, or vegetated stream corridors, as well as any bat roosts, their access points or known flight lines.’ Delete sentence three.	In the interests of clarity and in response to representation from statutory consultee.  To remove undue repetition.	3725	✓	No implications for the HRA	No significant change. Addition of wording to add clarity and reinforce biodiversity and ecosystem policy. No change to the SA conclusion
FCWS/ 907		Para 11.354	Insert under ‘Air’ in PSD12  Insert new paragraph after 11.354:	In the interests of clarity and in response to representation from statutory consultee.	3752		No implications for the HRA	No significant change. Addition of wording for clarity and to

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications		
					Representation	Council Change	HRA	SA/SEA	
			'Proposals which would be likely to result in increased nutrient loading to the environment, such as intensive livestock units, will be required to assess the potential impacts in respect of water and air quality, to ensure that they do not adversely affect these natural and semi natural environments, and that emissions in rural areas do not impact urban areas of the county. Reference should be made to NRW guidance OGN (Operational Guidance Note) 41: Assessment of ammonia and nitrogen impacts from livestock units when applying for an Environmental Permit or Planning Permission (March 2017) and NRW QG (Quick Guide) 9: Poultry Units: planning permission and environmental assessment).'					reinforce environmental legislation. The change remains consistent with the SA objectives. No change to the SA conclusion	
FCWS/92		11.355	Insert the following text after 'international importance to nature conservation' 'SSSI's, Section 7 priority habitats and species and the maintain and enhance requirement.' Remove sentence one.	In the interests of clarity and in response to representation from statutory consultee.  To remove undue repetition.	3755	✓	No implications for the HRA	No significant change. Addition of wording for clarity and to better reflect environmental legislation. The change remains consistent with the SA objectives. No change to the SA conclusion	
FCWS/99 Page 108		Para 11.358	Amend text of second sentence to 'Work should not commence on site until an appropriate stage of remediation as agreed, has been completed.'	In the interests of clarity and in response to representation from statutory consultee.	3726		No implications for the HRA	No significant change. Minor rewording for clarity.	
<b>Strategic Policy – SP12: Rural Development</b>									
FCWS/98		RD2	Amend the wording of Policy RD2: Conversion and Re-Use of Rural Buildings for Residential Use to read as follows:	In response to a representation and to ensure the policy is reflective of the Councils corporate and policy	3737	✓	No implications for the HRA	No significant change. Change to wording and	

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications		
					Representation	Council Change	HRA	SA/SEA	
Page 1309 FCWS/09			<p>“Proposals for the conversion and re-use of suitable rural buildings for residential use will be permitted where:</p> <p>a) the existing use has ceased, and its re-use would not result in the need for an additional building;</p> <p>b) the design and materials are of a high quality, and the form and bulk of the proposal, including any extensions, curtilage and access arrangements are sympathetic to and respect: the surrounding landscape, rural character of the area and the appearance of the original building;</p> <p>c) Proposals for extensions should be proportionate and reflective of the scale, character and appearance of the original building;</p> <p>d) the original building is structurally sound and any rebuilding works, necessitated by poor structural conditions and/ or the need for new openings in walls, do not involve substantial reconstruction;</p> <p>e) where applicable, the architectural quality, character and appearance of the building is safeguarded and its setting not unacceptably harmed.</p> <p>Proposals relating to buildings which are of a modern portal framed construction will not generally be considered appropriate for residential conversion.”</p>	agenda in relation to rural communities.					phrasing to add clarity. No change to the SA
		Para 11.375	Add the following to the end of the last sentence of paragraph 11.375:	In the interest of clarity and in recognition of Policy PSD2.		✓	No implications for the HRA	No significant change. Reiterates and	

Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
			“(reference should be made to Policy EME5: Home Working and Policy INF3: Broadband and Telecommunications).”					provides a link to Policies EME5 and INF3. No change to the SA.
FCWS/ 96		Policy RD2 Para 11.386	Delete paragraph 11.386 and replace with the following: “Proposals for the conversion of suitable rural buildings for residential use should be of a high quality in terms of design and the materials used. It is not the purpose of the policy to permit proposals where an existing building is unsuitable for conversion without extensive alteration, rebuilding or extension, or if the creation of a residential curtilage would have a harmful effect on the character of the countryside. Such proposals will be considered as new house in the open countryside.”	To ensure the policy is reflective of the Councils corporate and policy agenda in relation to rural communities.		✓	No implications for the HRA	No significant change. Change in the meaning of the paragraph to reflect policy in relation to residential use of buildings in the rural community. The change remains consistent with the SA objectives. No change to the SA.
FCWS/ 97		Policy RD2 Para 11.388	Delete paragraph 11.388 and replace with the following: Proposals for buildings of a modern construction such as portal framed units or temporary structures will not generally be considered appropriate for conversion. Proposals for buildings within the residential curtilage which were constructed as ancillary to the primary property e.g. garages will not generally be considered for conversion under this policy.	To ensure the policy is reflective of the Councils corporate and policy agenda in relation to rural communities.		✓	No implications for the HRA	No significant change. Change in wording and addition of text to provide clarity. No change to the SA.

Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
FCWS/ 98		SP13	Amend second paragraph of policy SP13 to read as follows:  “Proposals must reflect the role that natural environment aspects and features and an ecologically connected environment have in protecting and enhancing biodiversity, defining the landscape, contributing to Well-being and the principles of the Sustainable Management of Natural Resources.”	In the interests of clarity and in response to representation from statutory consultee.	3727		No implications for the HRA	No significant change to the SA. Inclusion of additional wording for clarity and closer alignment with legislation. No change to the SA content.
FCWS/ 99		SP13	After the first sentence of paragraph 3 of Policy SP13, insert the following new sentence:  “Any development proposal should contribute towards the overall aim of the South West Wales Area Statement (NRW, 2020) in building resilience of our ecosystems and enhancing the benefits they provide”	To reflect the priorities of the SWWAS and in response to representation from statutory consultee.	3578		No implications for the HRA	No significant change. Reference to a policy document ensuring that the Plan more fully aligns with the SA.
FCWS/ 100		SP13	Amend first sentence of third paragraph of policy SP13 to read as follows:  “All development proposals should be considered in accordance with National Policy (PPW and TAN5) where a proposal for development would result in a significant adverse effect on designated sites, including European sites, SSSI's, and priority habitats and species.”	In the interests of clarity and in response to representation from statutory consultee.	3732, 3733		No implications for the HRA	No significant change to the SA. Inclusion of additional information for clarity. No change to the SA content.
FCWS/ 1311		SP13	Insert new paragraph (i.e. paragraph 4) within Policy SP13 to read as follows:  “Development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net	To reflect PPW10 and Chief Planning Officer (2019) guidance on securing biodiversity enhancements and in response to representation from statutory consultee.	3729		No implications for the HRA	No significant change. Reference to new guidance that reinforces biodiversity and

Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
			benefit for biodiversity. Where biodiversity enhancement is not proposed as part of a proposal for development, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise it will be necessary to refuse permission.”					sustainability policy.
FCWS/ 102		11.401	Insert the words ‘for mitigating the effects of climate change, for capturing and storing carbon and’ in the penultimate sentence, after the word ‘infrastructure’.	In the interests of clarity and to reinforce the carbon reduction agenda.		✓	No implications for the HRA	No significant change. Addition of wording to add clarity and reinforce sustainability policy.
FCWS/ 103		11.403	Add new sentence at the end of paragraph 11.403 to state as follows:  “Those natural environment aspects and features cited in the policy would include geology, landform, soils, land cover and hydrology.”	In the interests of clarity and in response to representation from statutory consultee.	3727		No implications for the HRA	No significant change. Minor rewording for clarity.
FCWS/ 104		11.406	Add new sentence at the end of paragraph 11.406 to state as follows:  “The policy reflects the content of the Chief Planning Officer’s letter dated 23rd October 2019 on Securing Biodiversity Enhancements. Reference is also made to the South West Wales Area Statement (2020) in this regard”.	In the interests of clarity and in response to representation from statutory consultee. Also, to reflect the South West Wales Area Statement and the Chief Planning Officer’s letter.	3730		No implications for the HRA	No significant change. Addition of information to add clarity and reinforce sustainability policy. The change more fully aligns the Plan to the SA objectives.
FCWS/ 102		Policy NE2	Amend the first sentence of the policy to include the following after ‘biodiversity’ ‘in	In the interests of clarity and in response to representation from statutory consultee.	3734		No implications for the HRA	No significant change. Minor

Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
			accordance with Section 6 of the Environment (Wales) Act 2016'					rewording for clarity.
FCWS/106		Para 11.411	Amend the second sentence as follows 'Full reference should be made to the Nature Conservation and Biodiversity SPG, Chapter 6 PPW10 and the Chief Planning Officers letter (2019) on securing Biodiversity Enhancements.'	In the interests of clarity and in response to representation from statutory consultee.	3740		No implications for the HRA	No significant change. Inclusion of additional information for clarity. The SA conclusions remain unchanged.
FCWS/107		Para 11.413	Remove the words 'Where required' at the start of the paragraph.	In the interests of clarity and in response to representation from statutory consultee.	3741		No implications for the HRA	No significant change. Deleted text allowing for closer alignment with policy. The SA conclusions remain unchanged.
FCWS/108		Para 11.419	Include the word 'Scrub' after 'road verges'	In the interests of clarity and in response to representation from statutory consultee.	3748		No implications for the HRA	No significant change. Minor change in wording for clarity. The SA conclusions remain unchanged.
FCWS/109		Policy NE3	Criterion a) Before 'exceptional circumstances' delete 'There are', and replace with 'In'	In the interests of clarity and partly in response to representation from statutory consultee.	<b>3746</b>		No implications for the HRA	No significant change. Minor change in wording for clarity. The SA conclusions remain unchanged.
FCWS/113		Policy NE5	Insert new criterion 'e) They conserve and enhance the landscape, seascape, biodiversity and historic environment.'	To reflect the theme of the Carmarthen Bay, Gower and Swansea Bay Seascape Character	<b>3756</b>		No implications for the HRA	No significant change. Change in wording for

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
				Assessment and in response to representation from statutory consultee.				clarity and to reflect the theme of the Carmarthen Bay, Gower and Swansea Bay Seascape Character Assessment. The SA conclusions remain unchanged.
FCWS/111		Para 11.427	Amend wording to read as follows 'New coastal management schemes or improvements to existing schemes will not be permitted for the purpose of enabling new development in areas of flood risk or coastal erosion.'	In the interests of clarity and in response to representation from statutory consultee.	<b>3762</b>		No implications for the HRA	No significant change. Change in wording for clarity and to better reflect coastal management policy. The SA conclusions remain unchanged.
FCWS/112		Policy NE6	Replace the word 'protect in criterion g) with 'conserve'	To reflect the theme of the Carmarthen Bay, Gower and Swansea Bay Seascape Character Assessment and in response to representation from statutory consultee.	<b>3763</b>		No implications for the HRA	No significant change. Change in wording for clarity and to reflect the theme of the Carmarthen Bay, Gower and Swansea Bay Seascape Character Assessment. The SA conclusions



Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
								remain unchanged.
FCWS/ 113		Policy NE7	Amend wording of Section 3, criterion i. by deleting "short let holiday accommodation, static and touring caravan sites, camping sites".	In response to a representation from a statutory consultee.	<b>3765</b>		No implications for the HRA	No significant change. Minor change in wording for clarity. The SA conclusions remain unchanged.
<b>Strategic Policy – SP14 – Protection and Enhancement of the Built and Historic Environment</b>								
FCWS/ 114		Policy BHE2	Amend wording of criterion b) to read as follows 'protecting international and national landscape designations including National Parks and Areas of Outstanding Natural Beauty (AONB) and their settings.'	In the interests of clarity and in response to representation from statutory consultee.	<b>3786</b>		No implications for the HRA	No significant change. Minor change in wording for clarity. The SA conclusions remain unchanged.
FCWS/ 115		Para 11.454	Amend last sentence by removing 'international designation' and inserting ',Brecon Beacons, Pembrokeshire Coast National Parks and Gower AONB.'	In the interests of clarity and in response to representation from statutory consultee.	<b>3787</b>		No implications for the HRA	No significant change. Minor change in wording for clarity. The SA conclusions remain unchanged.
FCWS/ 116		Para 11.456	Replace ' former Countryside Council for Wales' with 'NRW '	In the interests of clarity and in response to representation from statutory consultee.	<b>3788</b>		No implications for the HRA	No significant change. Minor change in wording for clarity. The SA conclusions remain unchanged.

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications		
					Representation	Council Change	HRA	SA/SEA	
FCWS/117		Para 11.457	Amend the first sentence to read as follows: 'The policy will be supported by a Landscape Character Assessment through Supplementary Planning Guidance (SPG).'	In the interests of clarity and in response to representation from statutory consultee.	3789		No implications for the HRA	No significant change. Minor change in wording for clarity. The SA conclusions remain unchanged.	
<b>Strategic Policy – SP15: Climate Change</b>									
FCWS/118		Para 11.465	Replace the wording that follows 'Climate change' with the following text 'are profound and are acknowledged in the South West Wales Area Statement and in the declaration of a climate emergency by the Welsh Government and Carmarthenshire County Council.'	In the interests of clarity and in response to a representation received.		✓	No implications for the HRA	No significant change. Change to phrasing to include new information. The change is likely to support the SA objectives.	
FCWS/119		Para 11.469	Delete the words "and/or topographical survey" from the penultimate sentence of paragraph 11.469.  Add the following wording at the end of paragraph 11.469 stating that:  "Only less vulnerable development will be permitted within Zone C2."	In the interests of clarity and in response to representation from statutory consultee.	3794		No implications for the HRA	No significant change. Amendment to wording for clarity. No change to the SA conclusion.	
FCWS/120		11.472	Insert the following at beginning of paragraph 11.472 before the first sentence: 'The Welsh Government has set targets to decarbonise the public sector, and to achieve net zero carbon status by 2030.'	In the interests of clarity and in response to a representation received.		✓	No implications for the HRA	No significant change. Additional phrasing to reiterate information introduced earlier in the Plan. The change is likely to	

Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
								support the SA objectives.
FCWS/ 121		CCH1	<p>Criterion a. Delete criterion a.</p>	Partly in response to a representation. Criterion a. repeats the provisions of Policy NE2: Biodiversity.	3167	✓	No implications for the HRA	No significant change. Removal of text to avoid duplication. Development remains subject to Policy NE2. No change to the SA conclusions.
FCWS/ 122		CCH1	<p>Criterion d. Insert “where required” after “mitigation measures” in criterion d.</p> <p>The criterion therefore now reads: d. Proposals should be accompanied with appropriate mitigation measures, <i>where required</i>, including satisfactory restoration of land following decommissioning.</p>	In response to a representation received.	3349		No implications for the HRA	No significant change. Inclusion of additional wording for clarity. No change to the SA conclusion
FCWS/ 123		CCH1	<p>Criterion 1. Replace 25MW with 10 MW, and insert “identified Pre-Assessed Areas for Wind Energy identified in “Future Wales” in place of “and adjoining Strategic Search Areas”. Delete reference to criterion a.</p> <p>The criterion therefore now reads: 1. Proposals for Large Scale Wind Farms Large scale wind farms of 10MW and over will be permitted within identified Pre-Assessed Areas for Wind Energy identified in “Future Wales” subject to them meeting criteria b to d.</p>	To reflect updated guidance and in response to representation from statutory consultee.	3885, 3795		No implications for the HRA	No significant change. Change in wording and phrasing to reflect new guidance. No change to the SA conclusion.

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
FCWS/124		CCH1	<p>Criterion 2.            Insert “for Solar developments” before “Local Search Areas”.            Replace “of between 5MW and 50MW” with “5MW and larger”.            “criteria a to d” should be relaced with “b to d”.            Insert “Developments should not have an unacceptable impact on visual amenity or landscape character.” at the end of the criterion.</p> <p>The criterion therefore now reads:            2. Proposals for Solar developments in Local Search Areas:            Proposals for solar developments of 5MW and larger will be permitted in identified Local Search Areas, subject to them meeting criteria b to d. Developments should not have an unacceptable impact on visual amenity or landscape character.</p>	In the interests of clarity and in response to representation from statutory consultee.	3797	✓	No implications for the HRA	No significant change. Change in wording to reflect new guidance. Insertion of additional text reinforcing SA objectives. No change to the SA conclusion.
FCWS/125		CCH1	<p>Criterion 3.            Replace “Strategic Search Areas” with “Pre-Assessed Areas”.            Delete “must not prejudice the purpose of these areas and”.</p> <p>Criterion e. – replace “turbines” with “components”.</p>	To reflect updated guidance and in response to representations, including from statutory consultees.	3885, 3795  3349  3349		No implications for the HRA	No significant change. Change in wording to reflect new guidance. No change to the SA conclusion.
FCWS/ Page 1318		New Paragraph	<p>Insert a new paragraph:            11.476a Particular support will be given to renewable and low carbon energy projects which are developed by communities, or which will benefit the host community. Such schemes should accord with the provisions of Policy CCH1.</p>	In the interests of clarity and in response to representation from statutory consultee.	3885		No implications for the HRA	Insertion of new paragraph to reflect new guidance. Possible positive change to be recorded in the

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
								SA. To be reviewed.
FCWS/127		New Paragraph	Insert a new paragraph: 11.476b Associated infrastructure developments that are required to assist the delivery of renewable and low carbon schemes will be supported, for example grid infrastructure and new energy storage facilities provided they accord with the policies of the Plan.	In the interests of clarity.		✓		No significant change. Insertion of new paragraph for clarity, and to assist in delivery of CCHI objectives. No change to the SA conclusion.
FCWS/128		Paras 11.479 – 11.481	Delete paragraphs 11.479-11.481.	To reflect updated guidance and in response to representations, including from statutory consultees.	3885, 3795		No implications for the HRA	No significant change. Deletion superfluous text in response to updated guidance. No change to the SA conclusion.
FCWS/129		New Paragraph	Insert new Paragraph: <b>Pre-Assessed Areas for Wind Energy</b> 11.481a “Future Wales: The National Plan 2040” identifies Pre-Assessed Areas for Wind Energy. Within these areas, there is a presumption in favour of large-scale wind energy development (including repowering). The Welsh Government has modelled the likely impact of the landscape within these areas and has found them to be capable of accommodating development in an acceptable way.	To reflect updated guidance and in response to representations, including from statutory consultees	3885, 3795		No implications for the HRA	No significant change. Insertion of new paragraph to reflect updated guidance. No change to the SA conclusion.
FCWS/1819		Para 11.483	Replace “Four” with “Three”, and replace “schemes of between 5MW and 50MW” with “schemes larger than 5MW”	To reflect the findings of the updated Renewable Energy Assessment.		✓	No implications for the HRA	No significant change. Amendment to wording to

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
								reflect findings of the Renewable Energy Assessment. No change to the SA conclusion.
FCWS/131		New Table	Insert new table setting out the three Local Search Areas (insert after para 11.483) – see Appendix 3.	In the interests of clarity and in response to representation from statutory consultee.	3885		No implications for the HRA	No significant change. Inclusion of additional information for clarity. No change to the SA conclusion.
FCWS/132		Para 11.483	Add the following to the end of the paragraph: “Developments will be required to minimise landscape and visual impacts.”	In the interests of clarity and in response to representation from statutory consultee.	3796		No implications for the HRA	No significant change. Inclusion of additional wording to reiterate landscape requirements of Policy CCH1. No change to the SA conclusion.
FCWS/133		Table 9	Update Table 9 to reflect the results of the revised Renewable Energy Assessment – See Appendix 2.	To reflect the findings of the updated Renewable Energy Assessment.		✓	No implications for the HRA	No significant change. Inclusion of additional information for clarity and to reflect findings of the Renewable Energy Assessment. No change to the SA conclusion.

Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
FCWS/134		CCH2	Amend policy CCH2 to include '(as a minimum)' after 'Fast EV Charging Unit' within the requirement Flats (non-dedicated parking bays).	In response to a representation received.	3172	✓	No implications for the HRA	No significant change. Change in phrasing to strengthen policy. No change to the SA conclusion.
FCWS/135		Para 11.495	Insert the following text at the end of paragraph 11.495 under Policy CCH2: "Proposals for Flats (non-dedicated parking bays) should provide Rapid charging points where the local electricity network is technically able to support its provision and where it doesn't render the development unviable."	In response to a representation received.	3172	✓	No implications for the HRA	No significant change. Addition of information to reinforce policy and provide clarity. No change to the SA conclusion.
FCWS/136		CCH2 - Supporting text: New paragraph	Insert the following new paragraph within the supporting text to CCH2: "This provision of this policy seeks to future-proof new housing as part of the Councils commitment to tackling the declared climate change emergency. However, it is recognised that as capacity improves across the grid there may be circumstances where the current and projected capacity is unable to meet the demands arising from the policy in relation to a particular development. In such circumstance's application should be accompanied by robust evidence detailing any such issues including viability implications in the undertaking of any infrastructure improvements would have on the development. Reference should be had to the SPG for ULEV requirements in new developments. "	In response to a representation received and to improve the implementation of the policy and site delivery.  The requirement for preparation of SPG will provide added clarity in the implementation of the policy and enable a more responsive approach having regard to technological developments and changes in market demand.	3368 3172	✓	No implications for the HRA	No significant change. Addition of information to reinforce policy and provide clarity. No change to the SA conclusion.

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
FCWS/137		CCH3 - Para 11.502	<p>Insert the following text at the end of the paragraph:</p> <p>'Reference is made to restoration as a key principle of the Water Framework Directive, such as the use of green engineering to restore the natural state and functioning of the river system by removing culverts to help support biodiversity, recreation, flood management and landscape development.'</p>	To address the key principles of the Water Framework Directive and in response to representation from statutory consultee.	<b>3802</b>		No implications for the HRA	No significant change. Inclusion of additional information and change in wording to reflect the key principles of the Water Framework Directive. The SA conclusions remain unchanged.
FCWS/138		Para 11.505	<p>At the end of the paragraph insert the following:</p> <p>'Reference should be made to Carmarthen Bay Abstraction Licencing Strategy (2014).'</p>	In the interests of clarity and in response to representation from statutory consultee.	<b>3804</b>		No implications for the HRA	No significant change. Inclusion of additional information for clarity. The SA conclusions remain unchanged.
FCWS/139		Para 11.506	<p>Include the following text in 11.506 not 11.502, at the end of the paragraph:</p> <p>'In some circumstances activity near watercourses will need consents including Flood Risk Activity Permits (FRAP) from NRW on main rivers and/or Flood Defence Consents from the LLFA on ordinary watercourses'</p>	In the interests of clarity and in response to representation from statutory consultee.	<b>3803</b>		No implications for the HRA	No significant change. Inclusion of additional information for clarity. The SA conclusions remain unchanged.
FCWS/1322		Para 11.506 –	<p>Delete the last sentence of paragraph 11.506, and replace with the following:</p> <p>'The requirement for an appropriate buffer adjoining both banks should be incorporated into any proposals to protect and encourage local biodiversity. The requirement is 8 meters</p>	In the interests of clarity and in order to provide sufficient guidance to developers		✓	No implications for the HRA	No significant change. Inclusion of additional information for clarity. The SA conclusions



Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
			where proposals relate to a main river, and 7 meters where proposals relate to an ordinary watercourse.'					remain unchanged.
FCWS/ 141		New paragraph	<p>Insert a new paragraph within the supporting text of Policy CCH3 to read as follows:</p> <p>“Reference should be had to paragraph 11.534(a) of Policy PSD12 in relation to proposals that can lead to increases in nutrient loading to the environment and the potential impact on water and air.”</p>	In the interests of clarity and in response to representation from statutory consultee.	<b>3752</b>		No implications for the HRA	No significant change. Addition of new paragraph for clarity and to reinforce environmental legislation. The change remains consistent with the SA objectives. No change to the SA conclusion
FCWS/ 142		CCH4	<p>Add the following wording at the end of criterion a) of policy CCH4 to state as follows:</p> <p>“However, only less vulnerable development will be permitted within Zone C2.”</p> <p>Consequential amendment of deletion of sentence 2 of paragraph 11.514.</p>	In the interests of clarity and in response to representation from statutory consultee.	3883		No implications for the HRA	No significant change. Amendment to policy wording for clarity. No change to the SA conclusion.
FCWS/ 143		CCH6	<p>Insert the following at the start of para 11.522:</p> <p>‘Proposals must be appropriate to the landscape and ecology character of the locality.’</p>	In the interests of clarity and in response to representation from statutory consultee.	3805		No implications for the HRA	No significant change. Addition of wording to add clarity.
<b>Strategic Policy - SP17: Transport and Accessibility</b>								
FCWS/ 143		TRA4	<p>Insert the following text at the end of the policy ‘The importance of redundant rail corridors as wildlife corridors and</p>	In the interests of clarity and in response to representation from statutory consultee.	3806		No implications for the HRA	No significant change. Addition of wording to add clarity and

Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications		
					Representation	Council Change	HRA	SA/SEA	
			opportunities for expanding the network of green and blue infrastructure is recognised.'					reinforce sustainability policy.	
<b>Strategic Policy – SP18: Mineral Resources</b>									
FCWS/ 145		Policy SP18	Add the following wording to the end of Policy SP18:  "For sand and gravel, an 'Area of search' has been defined on the Proposals Map which will form the basis for future exploration and production in order to satisfy the broader subregional requirement as set out in RTS2."	In response to representation from statutory consultee, and to reflect the provisions of Regional Technical Statement for the North Wales and South Wales Regional Aggregate Working Parties– Second Review (RTS2).	3889		No implications for the HRA	No significant change. Inclusion of additional wording for clarity and to reflect updated guidance. No change to the SA conclusion.	
FCWS/ 146		Policy SP18 Subsection a)	Text of subsection a) of Policy SP18 to be amended to:  "Ensuring an adequate supply of minerals, including maintaining an adequate landbank of permitted aggregate reserves (a minimum 10 years for hard crushed rock, and a minimum 7 years for sand and gravel) throughout the Plan period;"	In the interests of clarity and in response to a representation received.	3560		No implications for the HRA	No significant change. Amendment to wording for clarity where the meaning and permitted reserve amounts remain the same. No change to the SA conclusion.	
FCWS/ 147		Policy SP18 Subsection c)	Text of subsection c) of Policy SP18 to be amended to:  "Safeguarding minerals infrastructure, and areas underlain by minerals of economic importance where they could be worked in the future, to ensure that such resources and infrastructure are not unnecessarily sterilised by other forms of development;"	In the interests of clarity and in response to a representation received.	3561		No implications for the HRA	No significant change. Inclusion of additional wording for clarity. No change to the SA conclusion.	
FCWS/ 148		Para. 11.555	Amend the first sentence of paragraph 11.555 in accordance with PPW10, paragraph 5.14.2, bullet point 1 as follows:		3562, 4409		No implications for the HRA	No significant change. Inclusion of additional	

Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
			“The LDP will seek to ensure that the County provides positively for the working of mineral resources to meet society’s needs, and that such resources and minerals infrastructure are safeguarded from sterilisation.”		(agreed in part)			wording for clarity and to strengthen the policy. No change to the SA conclusion.
FCWS/149		Para. 11.557 & 11.558	<p>Amend paragraphs 11.557 and 11.558 to reflect the recent publication of the RTS 2nd Review, as follows (N.B the new wording comprises 5 paragraphs. Consequential changes will be made to subsequent paragraph numbers):</p> <p>“Regional Technical Statement for the North Wales and South Wales Regional Aggregate Working Parties– Second Review (RTS2) (September 2020) 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).</p> <p>For crushed rock, Carmarthenshire forms part of the Swansea City Sub-region, along with the local authorities of Swansea and Neath Port Talbot. Although a present, Swansea is unable to demonstrate an inability to meet RTS2 apportionments, there are more than sufficient reserves within NPT and Carmarthenshire to take up the joint apportionment within this period without resulting in under provision. A statement of sub-regional collaboration (SSRC) has been produced which demonstrates how the constituent Authorities satisfy the requirements of RTS2 in respect of future crushed rock provision.</p>	To reflect the recent publication of the RTS 2nd Review and in response to a representation.	3563, 3564 (agreed in part), 3565, 3889		No implications for the HRA	No significant change. Inclusion of additional text to reflect new guidance. The addition is consistent with the SA objectives. No change to the SA conclusion.

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
			<p>In terms of sand and gravel provision, it must be noted that the First Review of the RTS (RTS1) suggested that there would be merit in developing a combined approach to future apportionments and allocations between Pembrokeshire, Ceredigion and Carmarthenshire. Although Carmarthenshire is in a separate sub-region (primarily because of the market for crushed rock in the Swansea area), it is recommended in RTS2 that these joint working arrangements should continue, with regard to sand &amp; gravel. Therefore, there needs to be a joint approach to provision of the allocation requirement for 3.626 million tonnes over the period up to 2038.</p> <p>In the event that the allocations for sand and gravel in the three constituent authorities are not sufficient to meet the 3.626 million tonnes over the period up to 2038, then Consequently, an 'area of search' for sand and gravel has been identified on the proposals map (with further areas being identified by Pembrokeshire and Ceredigion in their respective Revised LDPs). Furthermore, a statement of sub-regional collaboration (SSRC) has been produced which demonstrates how the constituent Authorities satisfy the requirements of RTS2 in respect of future sand and gravel provision.</p> <p>In respect of working the resource within the area of search, this will not be carried out within 100m of residential properties. Furthermore, proposals will need to accord</p>					

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
			with the criteria set out within Policy MR1 Mineral Proposals.”					
FCWS/150		Policy MR1	Amend Policy MR1 to include an additional criterion will be included as follows:  “Effective measures should ensure that utilities infrastructure is protected.”	In the interests of clarity and in response to representation from statutory consultee.	3515		No implications for the HRA	No significant change. Inclusion of additional criterion for clarity. The change remains consistent with the objectives of the SA.
FCWS/151		Para. 11.560	Amend the paragraph 11.560 to read as follows: "The purpose of the policy is to maintain a balance between meeting national, regional and local demand for minerals and minimising the potential adverse effects that could result from such operations."	In the interests of clarity and in response to a representation received.	3566, 3844, 3863		No implications for the HRA	No significant change. Inclusion of additional wording for clarity. No change to the SA conclusions.
FCWS/152		MR2 Para. 11.562	Amend the first sentence of paragraph 11.562 to read as follows:  "Buffer zones are used to provide areas of protection around permitted and proposed mineral workings where new development which would be sensitive to adverse impact, including residential areas, hospitals, schools, should be resisted."	In the interests of clarity and to reflect the provisions of Planning Policy Wales.	3568		No implications for the HRA	No significant change. Inclusion of additional wording for clarity. No change to the SA conclusions.
FCWS/153		Para. 11.562	Amend the last sentence of paragraph 11.562 to read as follows:  “The identification of buffer zones will ensure that there is clear guidance on the proximity of mineral operations to sensitive land uses, and that the potential impact of mineral workings	In the interests of clarity and to reflect the provisions of Planning Policy Wales.	3569 (agreed in part)		No implications for the HRA	No significant change. Inclusion of additional wording for clarity. No change to the SA conclusions.

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
			is recognised and planned for in the area around the existing and proposed mineral operations.”					
FCWS/154		Policy MR3	Amended the title of Policy MR3 to read as follows: <b>“MR3: Mineral Safeguarding Areas”</b>  Amend policy MR3 to delete reference to ‘Areas of Search’.	In the interests of clarity and to reflect national policy.	3570, 3846 (agreed in part)		No implications for the HRA	Amendment made to MR3 title within the SA. Minor change in wording to add clarity.
FCWS/155		Para. 11.565	Change reference to Policy ‘MPP1’ to Policy ‘MR1’.	In the interests of clarity and to amend a typographic error.	3846		No implications for the HRA	No significant change. Minor change in policy number to remedy a typographic error.
<b>Monitoring and Implementation</b>								
FCWS/156		New appendix	Amend the monitoring and implementation framework to reflect the provisions of the LDP Manual Edition 3. Specific reference will be made to monitoring mechanisms around site delivery.	To reflect national guidance.	3871			
<b>Glossary</b>								
FCWS/157		Habitats Regulations Assessment (HRA)	Amend the Glossary of Terms to reflect the following. Update to reflect the 2017 Regulations and different regulation numbers. Replace with: ‘The screening and appropriate assessment of options required under Part 6 and Chapter 8 of The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) is a recognised iterative process which helps determine the likely significant effect on a plan	To reflect updated regulation.		✓	No implications for the HRA	No significant change.

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications		
					Representation	Council Change	HRA	SA/SEA	
			or programme and (where appropriate) assess adverse impacts on the integrity of a European site. The assessment is required to be undertaken by a competent authority in respect of plans or projects which are likely to have a significant effect (alone and in combination with other plans and projects) on a “European Site” (see paragraph 5.1.2 of Tan 5) The UK is bound by the terms of the EC Birds and Habitats Directives and the Ramsar Convention. The Conservation (Natural Habitats &c.) Regulations 1994 (the Habitats Regulations) and the Offshore Marine Conservation (Natural Habitats &c) Regulations 2007 refer to “European sites” and “European Offshore Marine Sites”.’						
FCWS/158			Amend the Glossary to include the following: The Welsh National Marine Plan (WNMP) 2019 prepared and adopted under the Marine and Coastal Access Act 2009.	In the interests of clarity and to reflect updated regulation		✓	No implications for the HRA	No significant change.	
FCWS/159			Addition of South West Wales Area Statement (2020) into the glossary, with the following text: ‘One of the 7 area statements produced in Wales by NRW as a collaborative response to the Natural Resources Policy (NRP), published by the Welsh Government in 2017, which sets out the key challenges and opportunities for the sustainable management of Wales’ natural resources into the future.’	In the interests of clarity and to reflect updated regulation		✓	No implications for the HRA	No significant change.	
<b>Appendix 1: Context – Legislative and National Planning Policy Guidance</b>									
FCWS/160		New Addition	Addition of South West Wales Area Statement to Appendix 1 (Regional)	In the interests of clarity and to reflect new regulation		✓	No implications for the HRA	No significant change.	
FCWS/161		New Addition	Addition of Welsh National Marine Plan (WNMP) 2019 to Appendix 1 (National)	In the interests of clarity and to reflect new legislation		✓	No implications for the HRA	No significant change.	

Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
FCWS/ 162		New Addition	Addition of Regional Technical Statement (RTS) for the South Wales Regional Aggregate Working Party 2nd Review 2020	In the interests of clarity and to reflect new guidance	3574		No implications for the HRA	No significant change.
FCWS/ 163		New Addition	Addition of Commercial Property: Market Analysis and Potential Interventions: A report to the Welsh Government, March 2020	In the interests of clarity and to reflect new guidance		✓	No implications for the HRA	No significant change.

## Appendix 2: Regional and Local Strategic Context

FCWS/ 164		New Addition	<p>Add the following new sentence at the end of the paragraph "Report and Recommendations of the Carmarthenshire Rural Affairs Task Group paragraph" (Local Context Section).</p> <p>"Reference is made to the 'Moving Rural Carmarthenshire Forward' Report (June 2019). The final report was approved at Full Council on the 11 September 2019 and is available on the Council's website."</p>	In the interests of clarity and to reflect the corporate context in which the Plan is prepared.		✓	No implications for the HRA	No significant change.
FCWS/ 165		New Addition	<p>Add the below new text within the Local Context Section beneath the section reviewing the Modernising Education Programme (MEP) to read as follows:</p> <p><b>"The Welsh language</b></p> <p>"The importance of the Welsh language in the social fabric of the County's communities is reflected in its significance at a corporate level within the Council. Of particular note in this regard are the below:</p> <p>1 Welsh in Education Strategic Plan 2017-2020;</p>	In the interests of clarity and to reflect the corporate context in which the Plan is prepared.		✓	No implications for the HRA	No significant change.



Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications		
					Representation	Council Change	HRA	SA/SEA	
			<p>2 Welsh Language Standards (Welsh Language (Wales) Measure 2011) Compliance Notice (issue date 30/9/2015) and the Welsh Language Standards Action Plan (2020/2021); and</p> <p>3 The Welsh Language Promotion Strategy 2016-2021.</p> <p>All of these documents can be viewed on the Council's website."</p>						
<b>Appendix 3: Supplementary Planning Guidance</b>									
FCWS/166			List of SPG to be amended to reflect changes in the dates of preparation.	To reflect the changes in the Revised LDP timetable and the need to review timings of their preparation.		✓	No implications for the HRA.	No significant change.	
<b>Appendix 7: Housing Trajectory</b>									
FCWS/		PrC2/h2	Trajectory to read as follows: 5 units in 2021-22 and 10 units in 2022-23.	To reflect the planning application.	<b>3677</b>	✓	No implications for the HRA. Amend site allocation in HRA where necessary	No significant change. Assessment already captured via the SA of sites. Amend site allocation in HRA where necessary	
FCWS/ Page 1331		PrC2/h11	Trajectory to read as follows: 20 units in 2024-25, 25 units in 2025-26 and 9 units in 2026-27.	To reflect feedback from landowner / developer.		✓	No implications for the HRA. Amend site allocation in HRA where necessary	No significant change. Assessment already captured via the SA of sites. Amend site allocation in HRA where necessary	

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
FCWS/		PrC2/h16	Trajectory to read as follows: 45 units in 2024/2025.	To reflect progress made in planning application and feedback from landowner / developer.		✓	No implications for the HRA. Amend site allocation in HRA where necessary	No significant change. Assessment already captured via the SA of sites. Amend site allocation in HRA where necessary
FCWS/		PrC2/h19	Trajectory to read (30 non-commitments) as follows: 30 units in 2022/2023.		<b>4395</b>	✓	No implications for the HRA. Amend site allocation in HRA where necessary	No significant change. Assessment already captured via the SA of sites. Amend site allocation in HRA where necessary
FCWS/		PrC2/h20	Trajectory to read as follows: 3 units in 2022/23 and 3 units in 2023/24.	To reflect feedback from landowner / developer.		✓	No implications for the HRA. Amend site allocation in HRA where necessary	No significant change. Assessment already captured via the SA of sites. Amend site allocation in HRA where necessary
FCWS/		SeC6/h2	Trajectory to read (31 non-commitments) as follows: 7 units in 2022-2023, 8 units in 2023-2024, 8 units in 2024-2025 and 8 units in 2025-2026.	To reflect progress made in planning application and feedback from landowner / developer.	<b>3358</b>	✓	No implications for the HRA. Amend site allocation in HRA where necessary	No significant change. Assessment already captured via the SA of sites. Amend site allocation in HRA where necessary
FCWS/		SeC7/h4	Trajectory to read as follows: 10 units in 2022/23 and 20 units in 2023/24.	To reflect progress made in planning application and feedback from landowner / developer.	<b>3801</b>	✓	No implications for the HRA. Amend site allocation in	No significant change. Assessment already captured via the SA of

Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
							HRA where necessary	sites. Amend site allocation in HRA where necessary
FCWS/		SeC7/h5	Trajectory to read as follows: 3 units in 2022/23 and 4 units in 2023/24.	To reflect feedback from landowner / developer.		✓	No implications for the HRA. Amend site allocation in HRA where necessary	No significant change. Assessment already captured via the SA of sites. Amend site allocation in HRA where necessary
FCWS/		SuV23/h1	Trajectory to read as follows: 5 units in 2021-2022, 5 units in 2022-2023 and 6 units in 2023-2024.	To reflect feedback from landowner / developer.		✓	No implications for the HRA. Amend site allocation in HRA where necessary	No significant change. Assessment already captured via the SA of sites. Amend site allocation in HRA where necessary.
FCWS/		SuV37/h2	Amend the trajectory – bring forward – awaiting response from Barton Willmore	To reflect feedback from landowner / developer.	<b>3147</b>		No implications for the HRA. Amend site allocation in HRA where necessary	No significant change. Assessment already captured via the SA of sites. Amend site allocation in HRA where necessary
FCWS/ Page 1333		SuV33/h1	Amend the site capacity to 5 and amend trajectory	To reflect feedback from landowner / developer.	<b>3195, 3372, 3733</b>		No implications for the HRA. Amend site allocation in HRA where necessary	No significant change. Assessment already captured via the SA of sites. Amend site allocation in HRA where necessary

Change Ref	Section/ Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
FCWS/		SuV36/h2	Amend site capacity to 16 and amend trajectory to read 16 dwellings to be delivered in 2024/25.	To reflect feedback from landowner / developer.		✓	No implications for the HRA. Amend site allocation in HRA where necessary	No significant change. Assessment already captured via the SA of sites. Amend site allocation in HRA where necessary
FCWS/		SuV11/h1	Amend trajectory to 6 dwellings in 2022/23 & 6 dwellings in 2023/24.	To reflect feedback from landowner / developer.		✓	No implications for the HRA. Amend site allocation in HRA where necessary	No significant change. Assessment already captured via the SA of sites. Amend site allocation in HRA where necessary
FCWS/			Include "Adj Tyle Teg, Llysysonnen Road" for 7 dwellings, and consequential amendment to Appendix 7.	To reflect a site that is currently under construction		✓	No implications for the HRA. Amend site allocation in HRA where necessary	No significant change. Assessment already captured via the SA of sites. Amend site allocation in HRA where necessary
FCWS/			Include "Llys Dolgader" for 9 dwellings, in the Housing Trajectory.	To reflect a site that is currently under construction		✓	No implications for the HRA. Amend site allocation in HRA where necessary	No significant change. Assessment already captured via the SA of sites. Amend site allocation in HRA where necessary
FCWS/		Prc3/h13	Increase the allocated figure for site PrC3/h13 from 101 to 135 dwellings	To reflect the planning permission and to include the 34 dwellings built during the period 2018-2019.		✓	No implications for the HRA. Amend site allocation in	No significant change. Assessment already captured via the SA of

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
							HRA where necessary	sites. Amend site allocation in HRA where necessary
FCWS/		Prc3/h32	Increase the allocated figure for site Prc3/h32 from 62 to 72 dwellings	To reflect the planning permission and the correspondence from landowner		✓	No implications for the HRA. Amend site allocation in HRA where necessary	No significant change. Assessment already captured via the SA of sites. Amend site allocation in HRA where necessary
FCWS/		SeC10/h1	Increase the allocated figure for site SeC10/h1 from 9 to 12 dwellings	To reflect the planning permissions		✓	No implications for the HRA. Amend site allocation in HRA where necessary	No significant change. Assessment already captured via the SA of sites. Amend site allocation in HRA where necessary
FCWS/		SeC16/h3	Increase the allocated figure for site SeC16/h3 from 5 to 15 dwellings	To reflect a more accurate developable number for the site.		✓	No implications for the HRA. Amend site allocation in HRA where necessary	No significant change. Assessment already captured via the SA of sites. Amend site allocation in HRA where necessary
FCWS/		SuV3/h1	Reduce the allocated figure of SuV3/h1 from 19 to 16 units.	To reflect the planning permission		✓	No implications for the HRA. Amend site allocation in HRA where necessary	No significant change. Assessment already captured via the SA of sites. Amend site allocation in HRA where necessary

Change Ref	Section/Chapter	Para/ Policy	Description of Change	Reason/Comment	Source		Implications	
					Representation	Council Change	HRA	SA/SEA
FCWS/		SeC12/h3	Amend the trajectory as follows: 5 units in 2023-24; 5 in 2024-25; 5 in 2025-26; 5 in 2026-27.	To reflect discussion with the land owner's agent.		✓	No implications for the HRA. Amend site allocation in HRA where necessary	No significant change. Assessment already captured via the SA of sites. Amend site allocation in HRA where necessary
FCWS/		SuV35/h1	Amend the trajectory as follows: 5 units in 2023-24; 5 in 2024-25; 5 in 2025-26; 5 in 2026-27; 5 in 2027-28; 5 in 2028-29; 5 in 2029-30.	To reflect discussion with the land owner's agent.		✓	No implications for the HRA. Amend site allocation in HRA where necessary	No significant change. Assessment already captured via the SA of sites. Amend site allocation in HRA where necessary
FCWS/		PrC3/h23	Amend the trajectory and decrease the allocation of PrC3/h23 from 15 to 13.	To take into account the 2 dwellings built outside the plan period.		✓	No implications for the HRA.	No significant change. Assessment already captured via the SA of sites.
FCWS/		PrC3/h24	Amend the trajectory and decrease the allocation of PrC3/h24 from 11 to 7.	To take into account the 4 dwellings built outside the plan period.		✓	No implications for the HRA.	No significant change. Assessment already captured via the SA of sites.

## Appendix A – Revised Table 6: Employment Land Provision (see FCWS/XX)

	<u>A. LDP Alloc</u>	<u>B. Complete</u>	<u>C. Completed but not forming part of allocated figure</u>	<u>D. Committed</u>	<u>E. Residual Supply (A-B-D=E)</u>
PC1 – Carmarthen	19.14	0	0	2.18	16.96
PC2 – Llanelli	15.77	0	0	0	15.77
PC3 – Ammanford/ Cross Hands	33.93	0	0	10.39	23.54
Service Centres	7.54	0	0	3.93	3.61
Sustainable Villages	0	0	0	0	0
Rural Villages	0	0	0	0	0
<b>Total</b>	<b>76.38</b>	<b>0</b>	<b>0</b>	<b>16.50</b>	<b>59.88</b>

Appendix B – Revised Table 9 (see **FCWS/XX**)

Energy Technology	Capacity Factor Assumed	Maximum*		Existing		Additional**		Total Installed	Total Energy Generated
		Potential 2033				Target 2033		Capacity	
		Electrical Capacity (MWe)	Energy Generated (MWh)	Installed Capacity (MW)	Energy Generated (MWh)	Installed Capacity (MWe)	Energy Generated (MWh)	2033 (MWe)	2033 (MWh)
Wind Power***	0.27	935.4	2,212,408	164.1	388,129	588.5	1,391,979	752.6	1,780,109
Biomass Energy Crop (CHP)	0.9	18.4	144,857	0.0	0	0.0	0	0.0	0
Energy from Waste with CHP	0.9	0.7	5,751	0.0	0	0.0	0	0.0	0
Hydropower	0.37	6.7	21,860	6.6	21,304	0.1	417	6.7	21,721
Landfill Gas	0.6	2.3	11,826	2.3	11,826	0.0	0	2.3	11,826
Solar PV Farms***	0.1	24,768.6	21,697,316	126.5	110,851	305.2	267,311	431.7	378,162
Other including food waste, animal slurry, poultry litter, sewage sludge and sewage gas. (AD with CHP)	0.42	3.3	12,046	1.0	3,679	1.3	4,857	2.3	8,536
Building Integrated	0.1	52.7	46,133	29.4	25,792	4.6	4,068	34.1	29,860
<b>Total</b>		<b>25,788</b>	<b>24,151,498</b>	<b>330</b>	<b>561,534</b>	<b>900</b>	<b>1,668,633</b>	<b>1,230</b>	<b>2,230,214</b>
<b>Electrical energy demand 2008</b>					<b>923,148</b>	<b>Projected electrical energy demand</b>			<b>917,389</b>
<b>Percentage electricity demand met by renewable energy resource</b>					<b>61%</b>				<b>243%</b>

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\*This is the maximum resource; it includes existing capacity and 100% of the potential.

\*\*Targets are based on a percentage of maximum potential minus existing generation.



\*\*\*The 2033 target includes 75% uptake of the wind and 1% of solar PV resource potential in the NDF priority areas and 100% uptake of the remaining area of the TAN8 site (wind) within Carmarthenshire as PPW requires planning authorities to ensure potential for renewable and low carbon energy generation is maximised.

**Appendix C – New Table (see FCWS/XX) (to be inserted after para 11.483)**

LSA	LSA Area (KM2)	Potential Installed Capacity (MW)	
A	3.31	72.9	North East of Farmers
B	0.90	23.8	Mynydd Pencarreg
C	0.99	30.3	West of Talley

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## Appendix 9: Schedule of Focused Changes: Proposals Maps

Change Ref	Settlement reference	Site Ref (where applicable)	Description of Change	Reason/Comment	Source	
					Representation	Council Change
<b>Inset Maps</b>						
<b>Cluster 1</b>						
FCM/Pr C1/a	Carmarthen	PrC1/h1	Remove the housing allocation from the site.  (consequential changes to the Written Statement – Reference should be had to the Schedule of Focused Changes: Written Statement).	Uncertainty over the delivery.	<b>4145, 4278</b>	
FCM/Pr C1/b	Carmarthen		Include site “Adj Tyle Teg, Llysonnen Road” which is currently under construction (planning application ref: W/36311).  (consequential changes to the Written Statement – Reference should be had to the Schedule of Focused Changes: Written Statement).	To reflect a site that is currently under construction.		✓
FCM/Pr C1/c	Llanllwch	AS/098/004	Amend the development limit to include the site AS/098/004.	To allow the flexibility for potential future development within a settlement with otherwise very limited growth.	<b>3276</b>	
FCM/Pr C1/d	Carmarthen		Amend the development limit to include the dwelling known as Waun-y-Groes and land to the south.	To allow the flexibility for potential future development / logical rounding off.		✓
FCM/Pr C1/e	Carmarthen		Deletion of the Primary Town Centre Retail Area and the Secondary Town Centre Retail Area.  Reference should be had to FCM/PrC1/f and the Schedule of Focused Changes: Written Statement.	To respond to the impacts arising from Covid-19 on the Retail Town Centre and to reflect national policy objectives.  To reflect the focused changes in relation to retail policies and notably the deletion of RTC1		✓

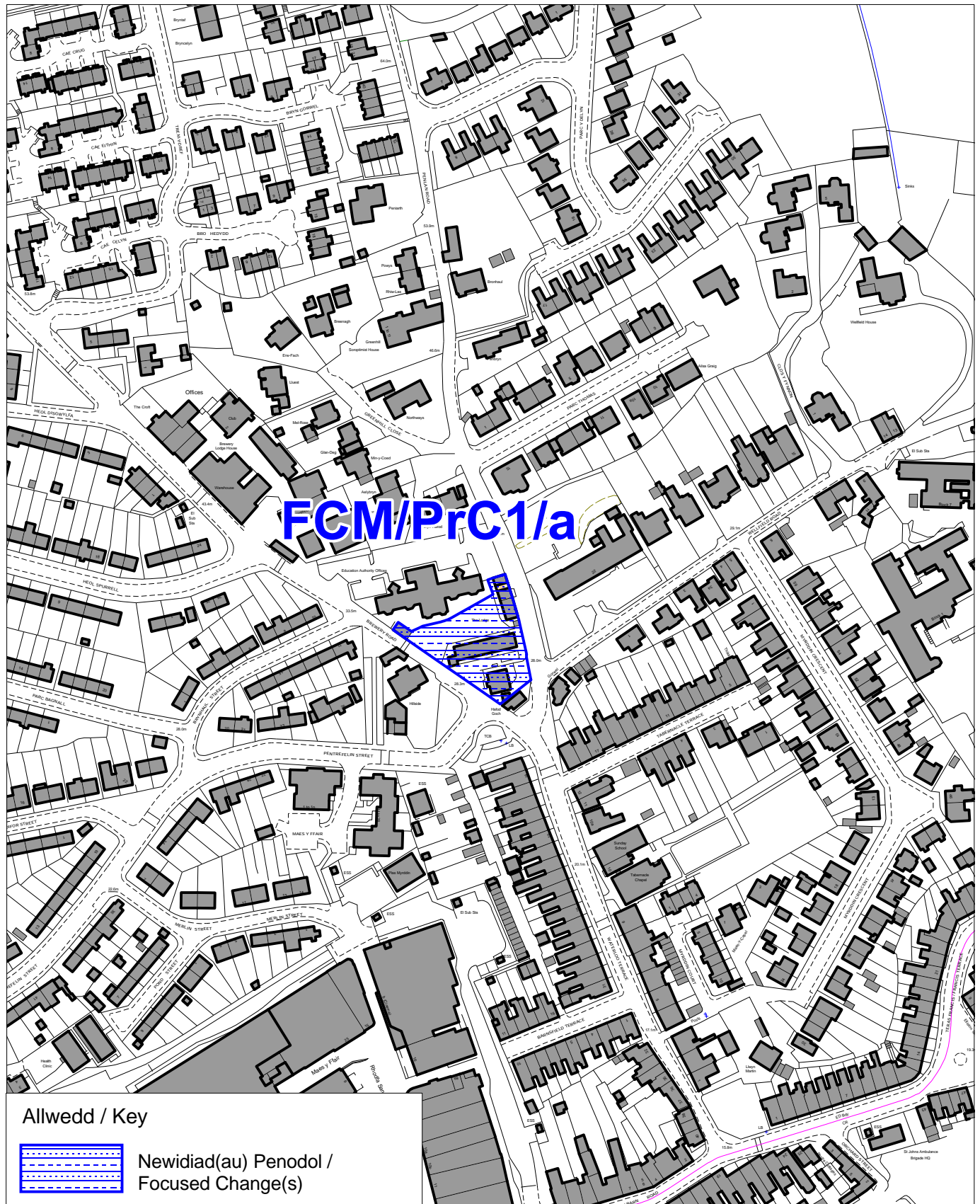
Change Ref	Settlement reference	Site Ref (where applicable)	Description of Change	Reason/Comment	Source	
					Representation	Council Change
				and the amendments to policy SP2.		
FCM/Pr C1/f	Carmarthen		Amend the Inset Map to include a newly defined Town Centre boundary for Carmarthen.  Reference should be had to FCM/PrC1/e and the Schedule of Focused Changes: Written Statement.	To respond to the impacts arising from Covid-19 on the Retail Town Centre and to reflect national policy objectives.  To reflect the focused changes in relation to retail policies and notably the deletion of RTC1.		
FCM/Se C1/a	Meinciau	AS/113/007	Amend the development limit to include the candidate site AS/113/007.	To reflect the existing pattern of the existing built form.	<b>3463</b>	
FCM/Se C2/a	Ferryside	Part of AS/058/004	Amend the development limit to include part of the candidate site AS/058/004.	To allow the flexibility for potential future development within a settlement with otherwise very limited small site growth.	<b>3225</b>	
FCM/Su V13/a	Llandyfaelog	AS/083/001	Amend the inset map to include the candidate site AS/083/001.	To allow the flexibility for potential future development within a settlement with otherwise very limited growth.	<b>3148, 3231, 3668</b>	✓
FCM/Su V13/b	Llandyfaelog	AS/083/003	Amend the Inset map to include an area of open space to the rear of the Community Hall.	To reflect the play area currently in situ.	<b>4364</b>	
FCM/W M/a	Nantycaws	AS/118/005	Identify the full extent of the revised site area for Nantycaws Waste Management Site (as set out in rep 4370) on the Proposals Map (Reference should be had to the Schedule of Focused Changes: Written Statement, which identifies the change of the site from a reserve site to a mixed use site).	To acknowledge the strategic importance of the site and to reflect the future potential in terms of sustainable uses.	<b>4370</b>	

# Caerfyrddin / Carmarthen PrC1

Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
Deposit Revised Carmarthenshire Local Development Plan 2018-2033

Newidiadau Penodol / Focused Changes

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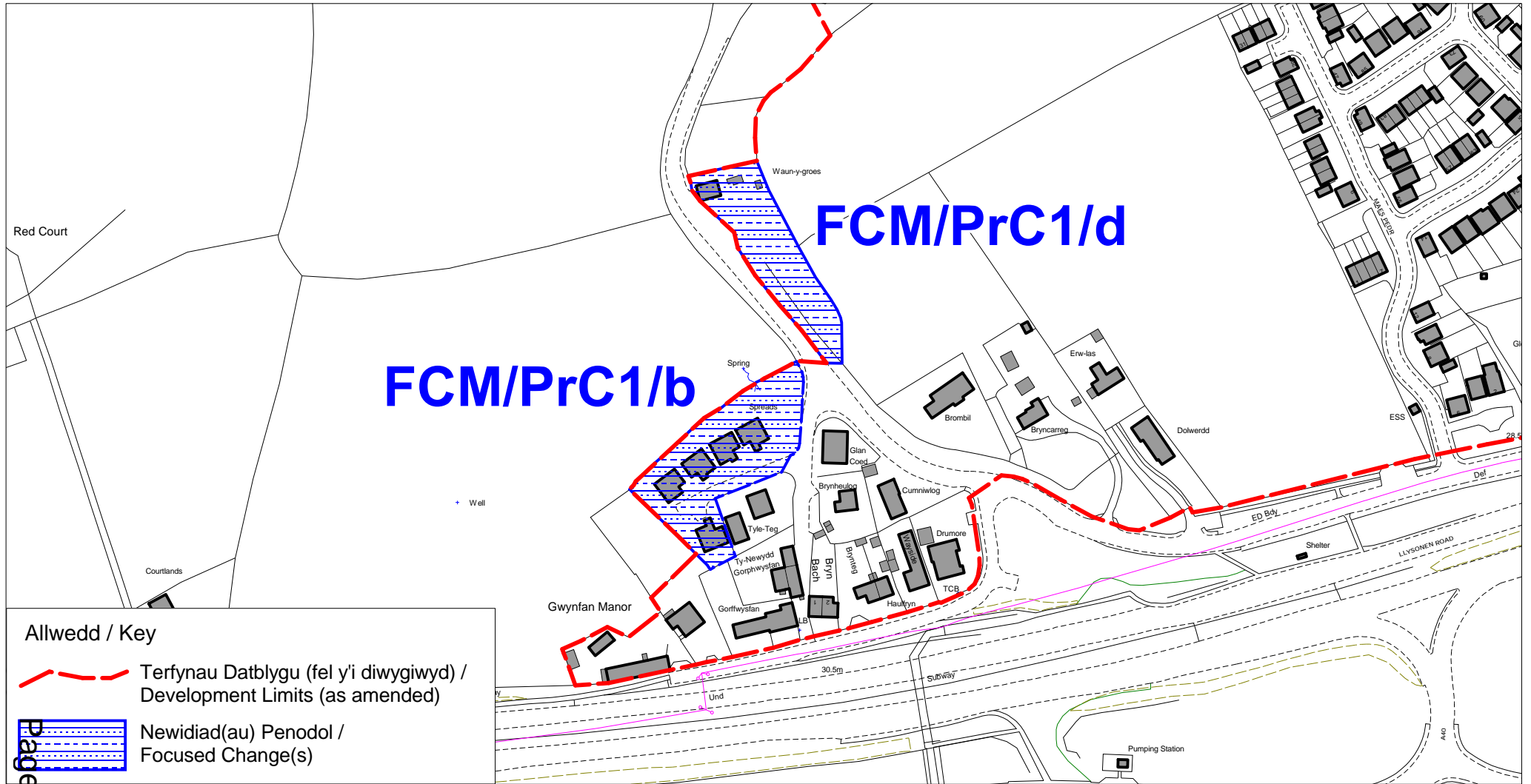
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Focused Change(s) Ref.:

# Caerfyrddin / Carmarthen PrC1

Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
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 Newidiadau Penodol / Focused Changes



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## Allwedd / Key

Terfynau Datblygu (fel y'i diwygiwyd) /  
 Development Limits (as amended)

Newidiad(au) Penodol /  
 Focused Change(s)

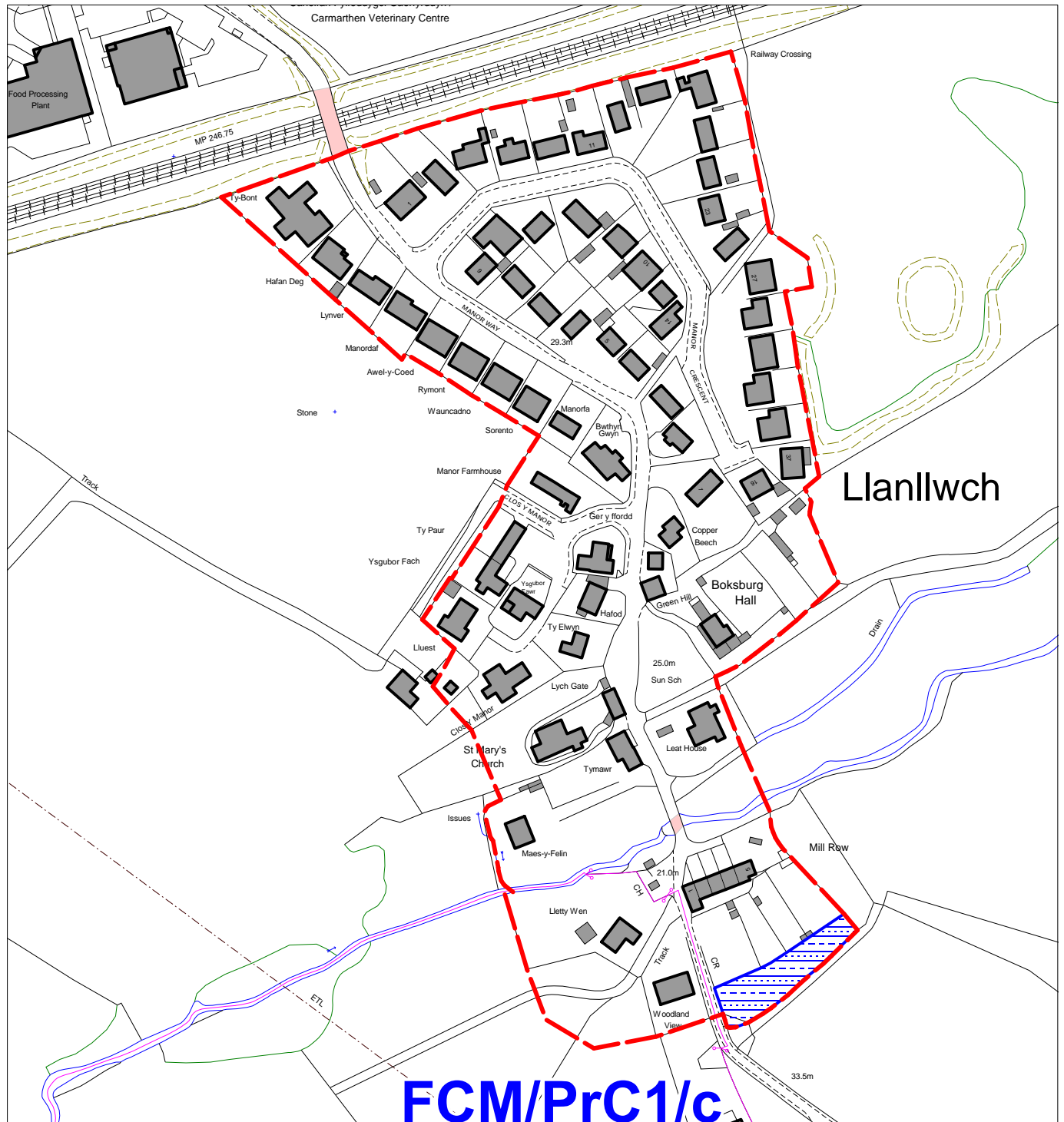
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 Focused Change(s) Ref.:

# Llanllwch, Caerfyrddin / Carmarthen PrC1

Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
 Deposit Revised Carmarthenshire Local Development Plan 2018-2033

Newidiadau Penodol / Focused Changes

Scale 1:250



## Allwedd / Key

- Terfynau Datblygu fel y'i diwygiwyd /  
Development Limits as amended
- Newidiad(au) Penodol /  
Focused Change(s)

Cyf. Newidiad(au) Penodol: **FCM/PrC1/c**  
 Focused Change(s) Ref.:

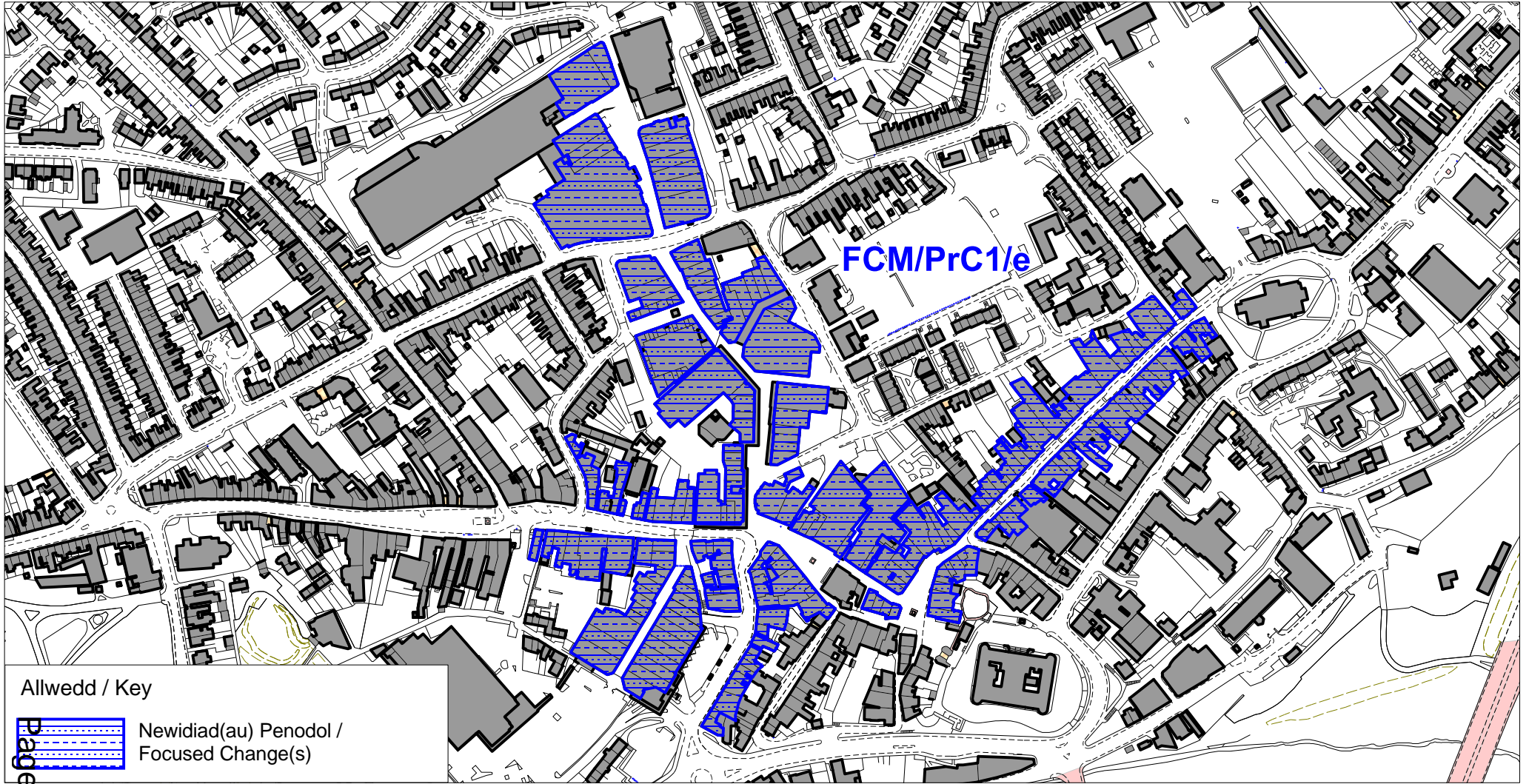
# Caerfyrddin / Carmarthen PrC1

Cynllun Datblygu Lleol Adnewid Diwygiedig Sir Gaerfyrddin 2018-2033  
Deposit Revised Carmarthenshire Local Development Plan 2018-2033  
Newidiadau Penodol / Focused Changes

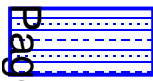


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Allwedd / Key



Newidiad(au) Penodol /  
Focused Change(s)

Cyf. Newidiad(au) Penodol: **FCM/PrC1/e**  
Focused Change(s) Ref.:



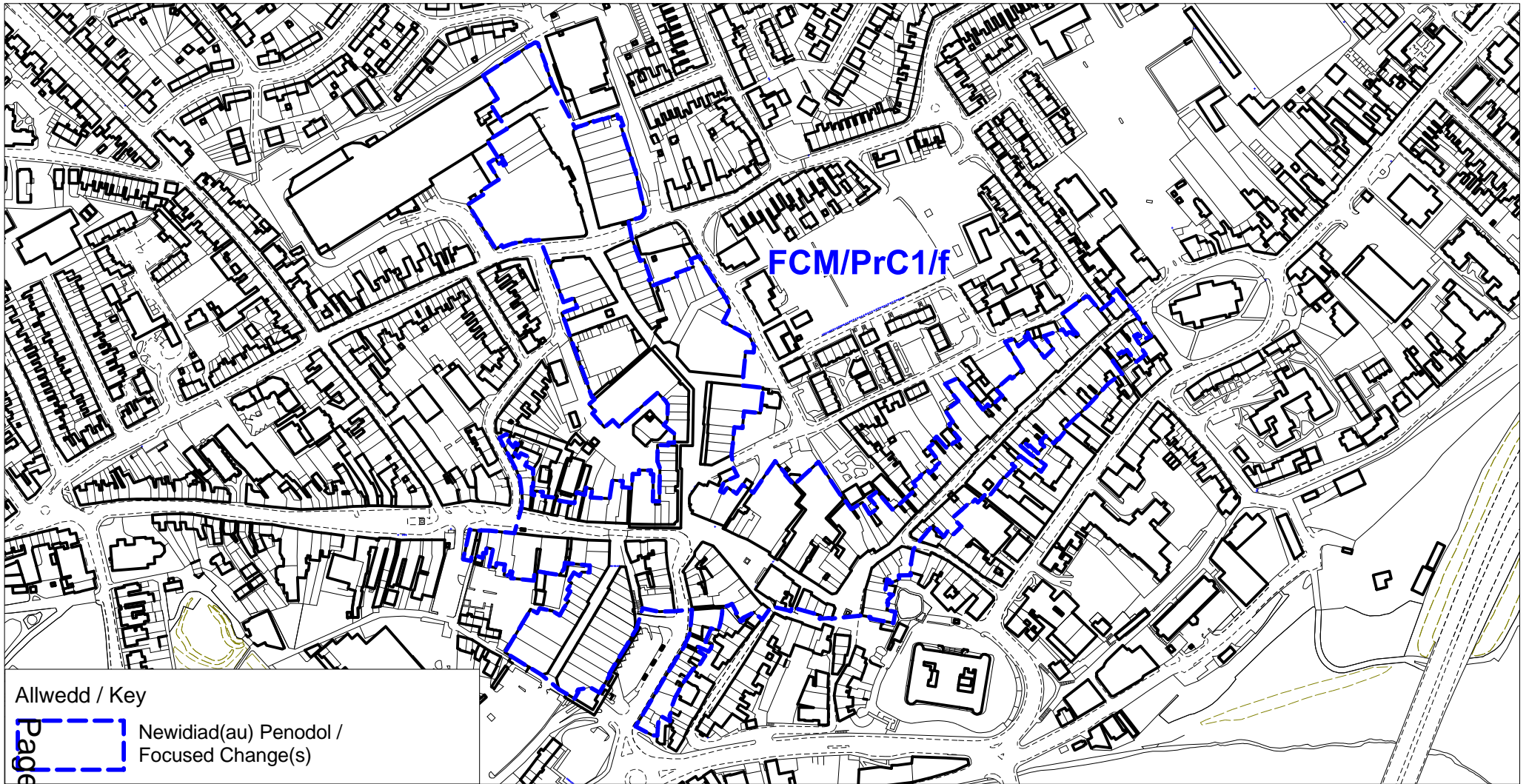
# Caerfyrddin / Carmarthen PrC1

Cynllun Datblygu Lleol Adnewid Diwygiedig Sir Gaerfyrddin 2018-2033  
Deposit Revised Carmarthenshire Local Development Plan 2018-2033  
Newidiadau Penodol / Focused Changes



Scale 1:4000

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Allwedd / Key

Page 1347  
Newidiad(au) Penodol /  
Focused Change(s)

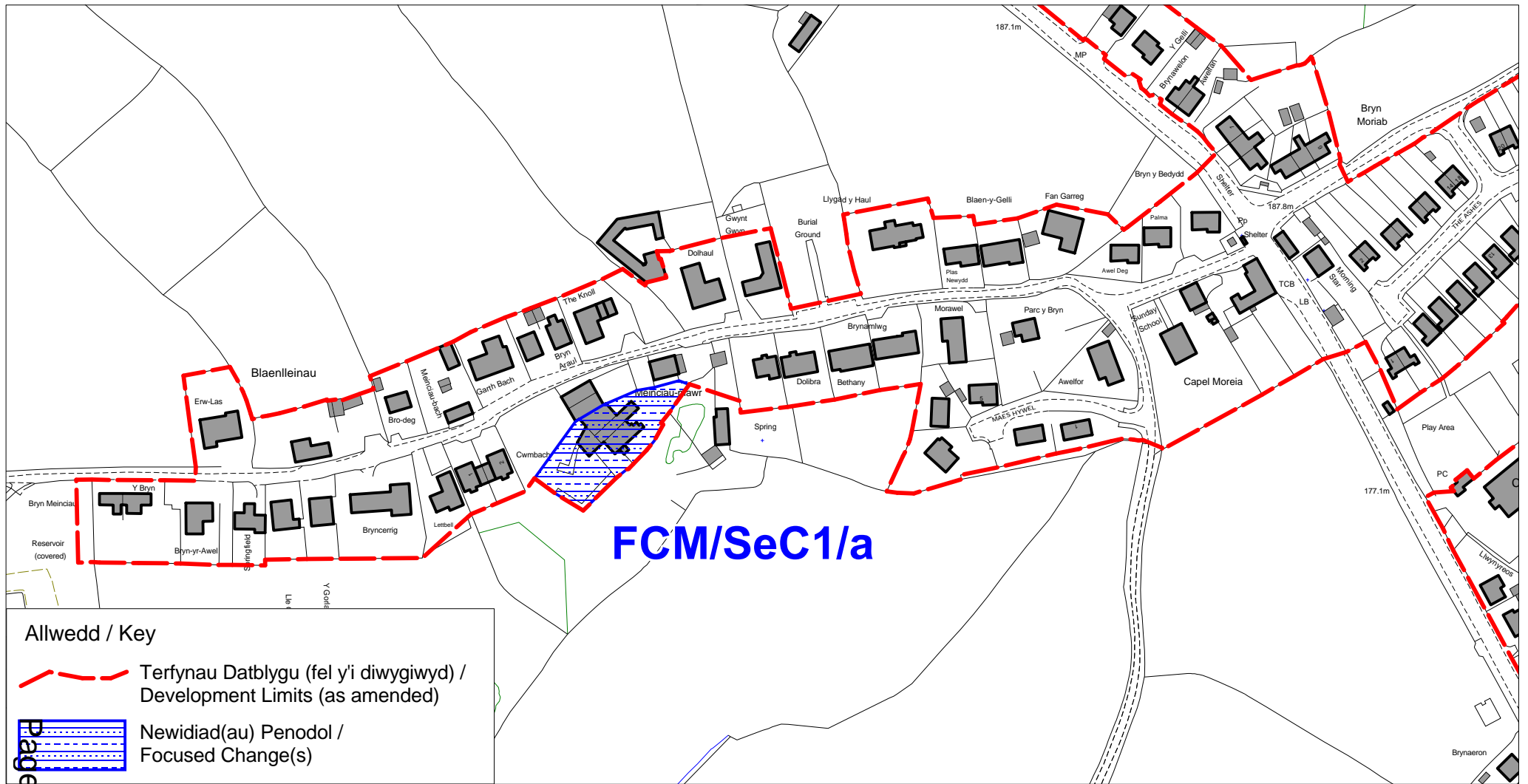
Cyf. Newidiad(au) Penodol: **FCM/PrC1/f**  
Focused Change(s) Ref.:

# Pont-iets/ Pontyates, Meinciau SeC1


Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
 Deposit Revised Carmarthenshire Local Development Plan 2018-2033  
 Newidiadau Penodol / Focused Changes

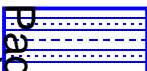
  
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Cyngor Sir Caerfyrddin, Adran Yr Amgylchedd  
 3 Heol Spilman, Caerfyrddin, SA31 1LE  
 Carmarthenshire County Council,  
 Environment Department,  
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## Allwedd / Key

 Terfynau Datblygu (fel y'i diwygiwyd) /  
 Development Limits (as amended)

 Newidiad(au) Penodol /  
 Focused Change(s)

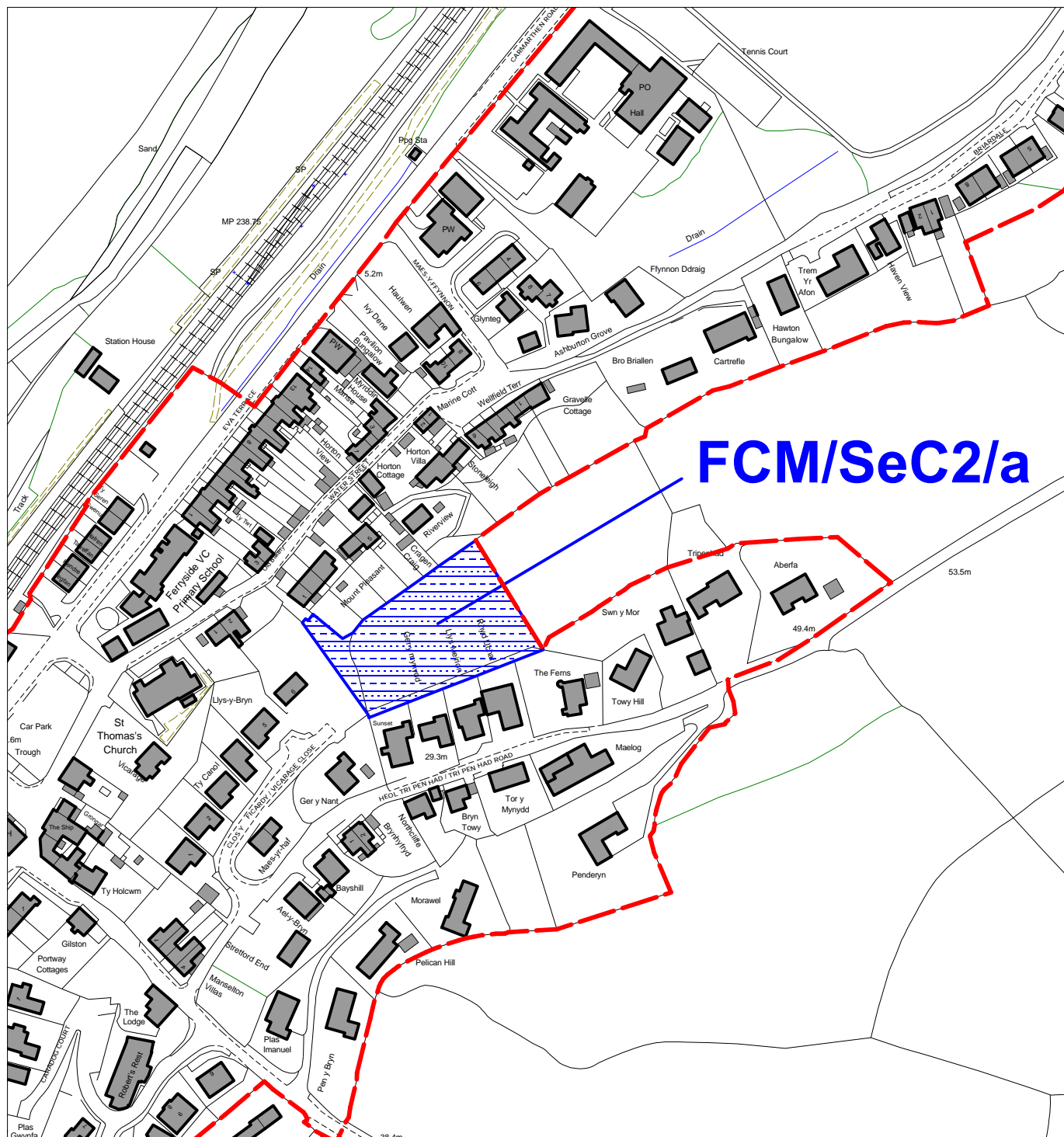
Cyf. Newidiad(au) Penodol: **FCM/SeC1/a**  
 Focused Change(s) Ref.:

# Glanyfferi / Ferryside SeC2

Cynllun Datblygu Lleol Adnewo Diwygiedig Sir Gaerfyrddin 2018-2033  
 Deposit Revised Carmarthenshire Local Development Plan 2018-2033

Newidiadau Penodol / Focused Changes

Scale 1:2500



**FCM/SeC2/a**

**Allwedd / Key**

- Terfynau Datblygu fel y'i diwygiwyd / Development Limits as amended
- Newidiad(au) Penodol / Focused Change(s)

Cyf. Newidiad(au) Penodol: **FCM/SeC2/a**  
 Focused Change(s) Ref.:

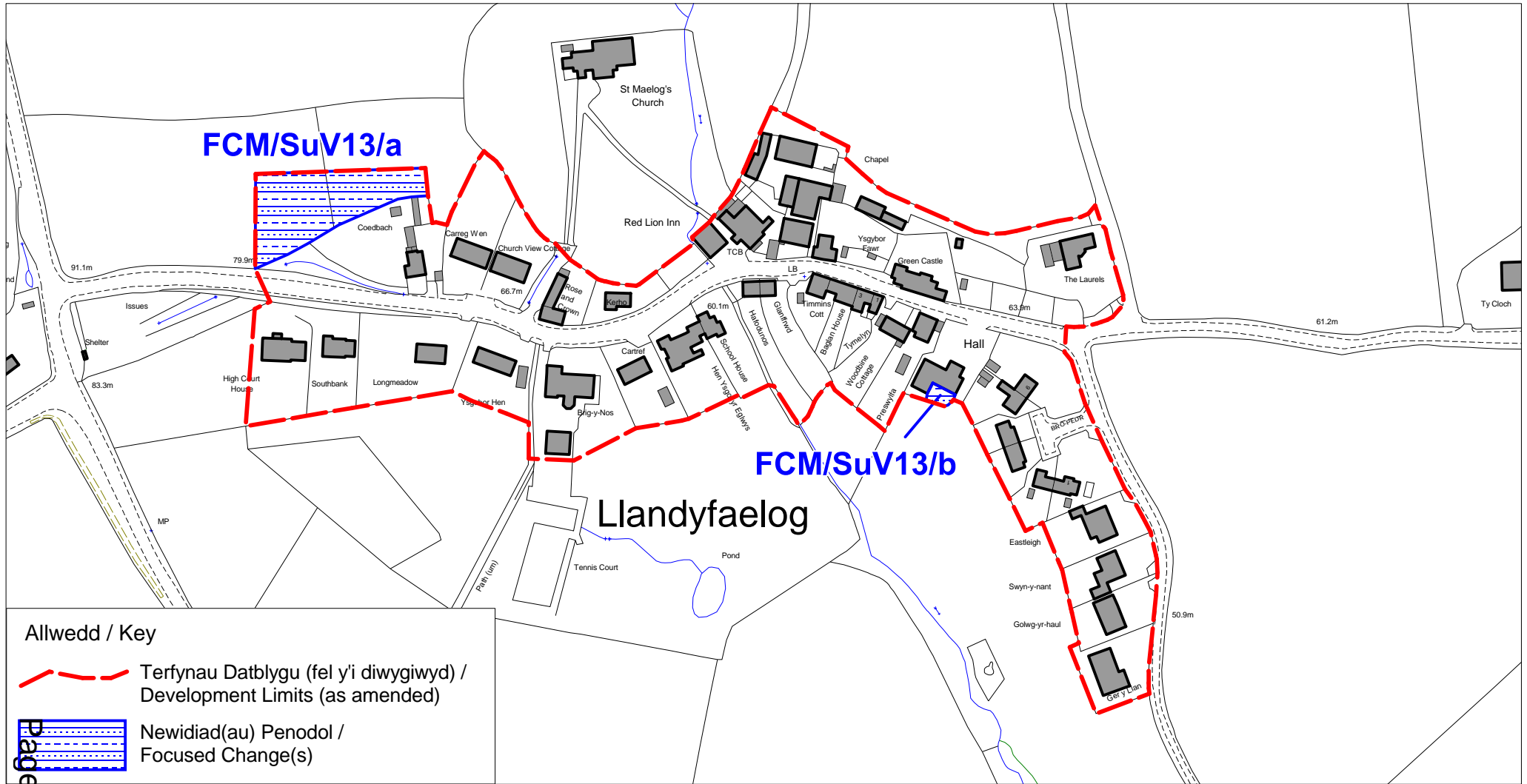
# Llandyfaelog SuV13

Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
 Deposit Revised Carmarthenshire Local Development Plan 2018-2033  
 Newidiadau Penodol / Focused Changes


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 Carmarthenshire County Council,  
 Environment Department,  
 3 Spilman Street, Carmarthen, SA31 1LE

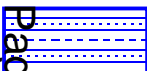


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## Allwedd / Key

 Terfynau Datblygu (fel y'i diwygiwyd) /  
 Development Limits (as amended)

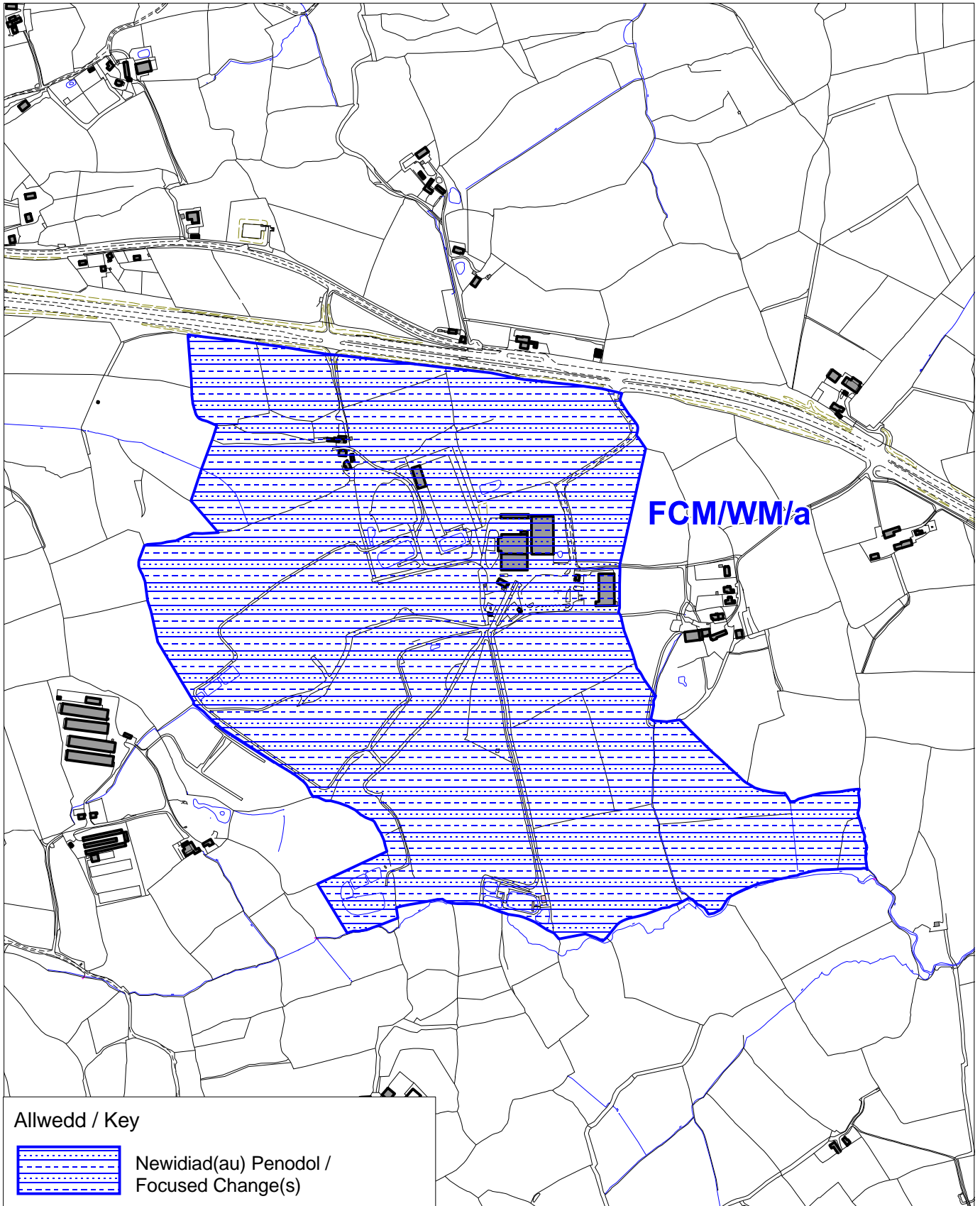
 Newidiad(au) Penodol /  
 Focused Change(s)

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 Focused Change(s) Ref.:

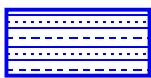
# Safle Adfywio a Defnydd Cymysg Nant y Caws / Nantycaws Regeneration and Mixed Use Site

Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
Deposit Revised Carmarthenshire Local Development Plan 2018-2033  
Newidiadau Penodol / Focused Changes

Scale 1:10000



## Allwedd / Key



Newidiad(au) Penodol /  
Focused Change(s)

Cyf. Newidiad(au) Penodol: **FCM/WM/a**  
Focused Change(s) Ref.:

Change Ref	Settlement reference	Site Ref (where applicable)	Description of Change	Reason/Comment	Source	
					Representation	Council Change
<b>Cluster 2</b>						
FCM/ PrC2/a	Llanelli PrC2	PrC2/GT1	Amend the extent of the allocation to remove the area that falls within C1 and C2 flood risk zones.	To ensure compliance with national planning policy (TAN 15 DAMs).	<b>3695, 3876</b>	
FCM/ PrC2/b	Llanelli PrC2		Allocate new mixed use site under policy SG1: Regeneration and Mixed Use Sites - YMCA Building, Stepney Street, Llanelli Town Centre.  Reference should be had to the Schedule of Focused Changes: Written Statement.	To reflect planning application progress and the corporate emphasis / investment in Llanelli Town Centre.  To reflect planning reference: PL/00673.		✓
FCM/ PrC2/c	Llanelli PrC2	PrC2/MU2	Amend / reduce the allocated site area to exclude an area of woodland to the west of the site.  Reference should be had to the Schedule of Focused Changes: Written Statement.	In response to a representation from a statutory consultee.	<b>3581 (agreed in part)</b>	
FCM/ PrC2/d	Llanelli PrC2	PrC2/h8	Delete the allocation (policy HOM1- Housing Allocations). Site to be retained within the development limits due to its position in the urban form.  Reference should be had to the Schedule of Focused Changes: Written Statement.	To reflect the fact that planning permission S/40455 contains four c3 use class units and the site should not therefore be allocated.		✓
FCM/ PrC2/e	Llanelli PrC2		Allocate new site under policy HOM1 – Housing Allocations at Llwynhendy Road for 13 units.  Reference should be had to the Schedule of Focused Changes: Written Statement.	To reflect planning reference: PL/00179.  Progress is being made in bringing the site forward and the Council's previous concerns on the retention of this Adopted LDP allocation		✓

Change Ref	Settlement reference	Site Ref (where applicable)	Description of Change	Reason/Comment	Source	
					Representation	Council Change
				(deliverability) have been addressed.		
FCM/PrC2/f	Llanelli PrC2		Allocate new site under policy HOM1 – Housing Allocations at Caegar, Bryn for 20 units, with a consequential amendment to the development limits.  Reference should be had to the Schedule of Focused Changes: Written Statement.	To reflect the fact that the Pre Application Consultation is competed and the confidence in deliverability (social housing provider). The Council’s previous concerns on the retention of this parcel of land as part of a wider allocation (deliverability) have been addressed.  Refer to planning reference: PL/00851.		✓
FCM/PrC2/g	Llanelli PrC2	AS/086/03 1	Include part of the site within the development limits on land adjacent to Tan y Graig, Felinfoel. Consequential amendment to the development limits.	To allow for an appropriate small scale residential development to take place.	<b>3664</b> <b>3776</b>	
FCM/PrC2/h	Llanelli PrC2	AS/086/07 8	Include the site within the development limits at Llys Pendderi, Bryn. Consequential amendment to the development limits.	To allow for an appropriate small scale residential development to take place.	<b>3226</b>	
FCM/PrC2/i	Llanelli PrC2	AS/086/08 9	Include the site within the development limits at Cae-Du, Bryn. Consequential amendment to the development limits.	To allow for an appropriate small scale residential development to take place.	<b>4454</b>	
FCM/SeC6/a	Hendy / Fforest SeC6	SeC6/h5	Delete the allocation (Policy HOM1 – Housing Allocations). Site to be retained within the development limits due to its position in the urban form.  Reference should be had to the Schedule of Focused Changes: Written Statement.	Whilst the allocation of the site was in accordance with the Site Assessment Methodology – feedback post publication of the deposit Plan has led to a lack of confidence in the site’s deliverability. Reference can be made to the Council’s response		✓

Change Ref	Settlement reference	Site Ref (where applicable)	Description of Change	Reason/Comment	Source	
					Representation	Council Change
				to representation reference number 3345 within the report of representations to the deposit LDP – policy HOM1 – Housing Allocations – site Sec6/h5.		
FCM/SeC7/a	Llangennech SeC7	SeC7/h5	Amend (increase) the allocated site area.  Reference should be had to the Schedule of Focused Changes: Written Statement.	To reflect the developable area and feedback received from the landowner.		✓
FCM/Su V24/a	Llansaint	AS/104/004	Amend the Inset map to include an extension to the area of open space within Llansaint.	To reflect the open space currently in situ.	<b>4363</b>	

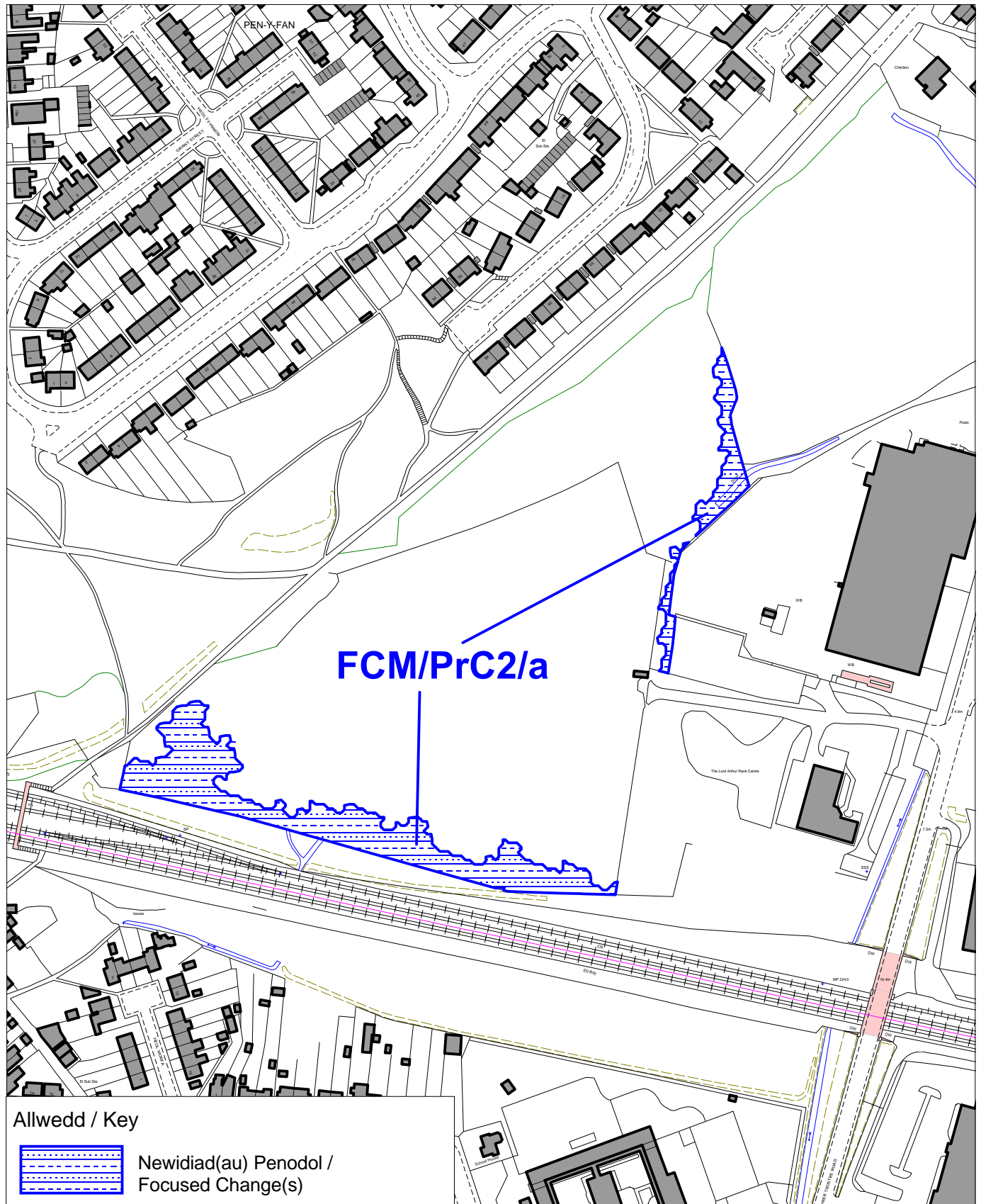


# Llanelli PrC2

Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
Deposit Revised Carmarthenshire Local Development Plan 2018-2033

Newidiadau Penodol / Focused Changes

Scale 1:2500



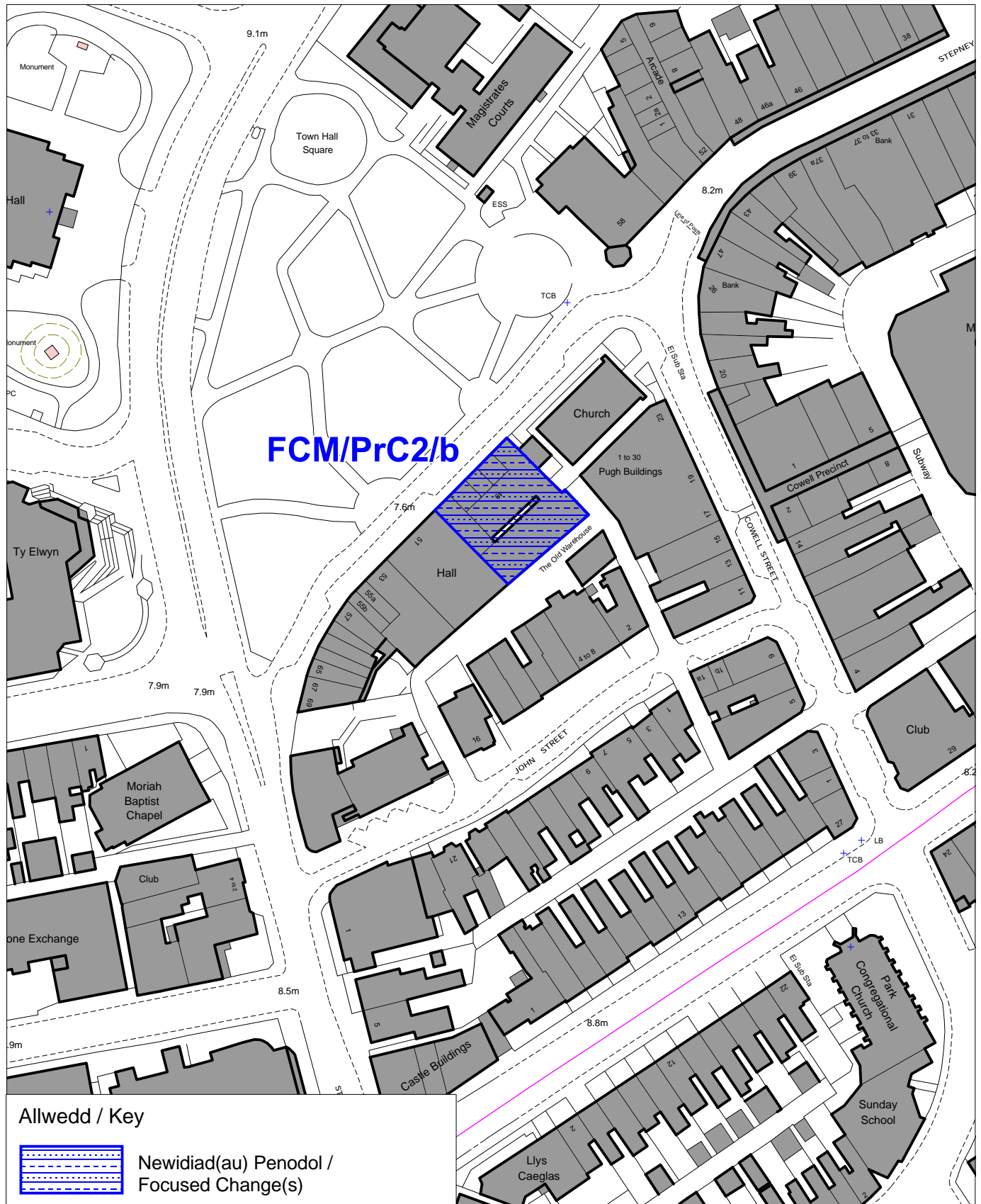
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Focused Change(s) Ref.:

# Llanelli PrC2

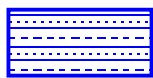
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 Deposit Revised Carmarthenshire Local Development Plan 2018-2033

Newidiadau Penodol / Focused Changes

Scale 1:1250



### Allwedd / Key



Newidiad(au) Penodol /  
 Focused Change(s)

Cyf. Newidiad(au) Penodol: **FCM/PrC2/b**  
 Focused Change(s) Ref.:

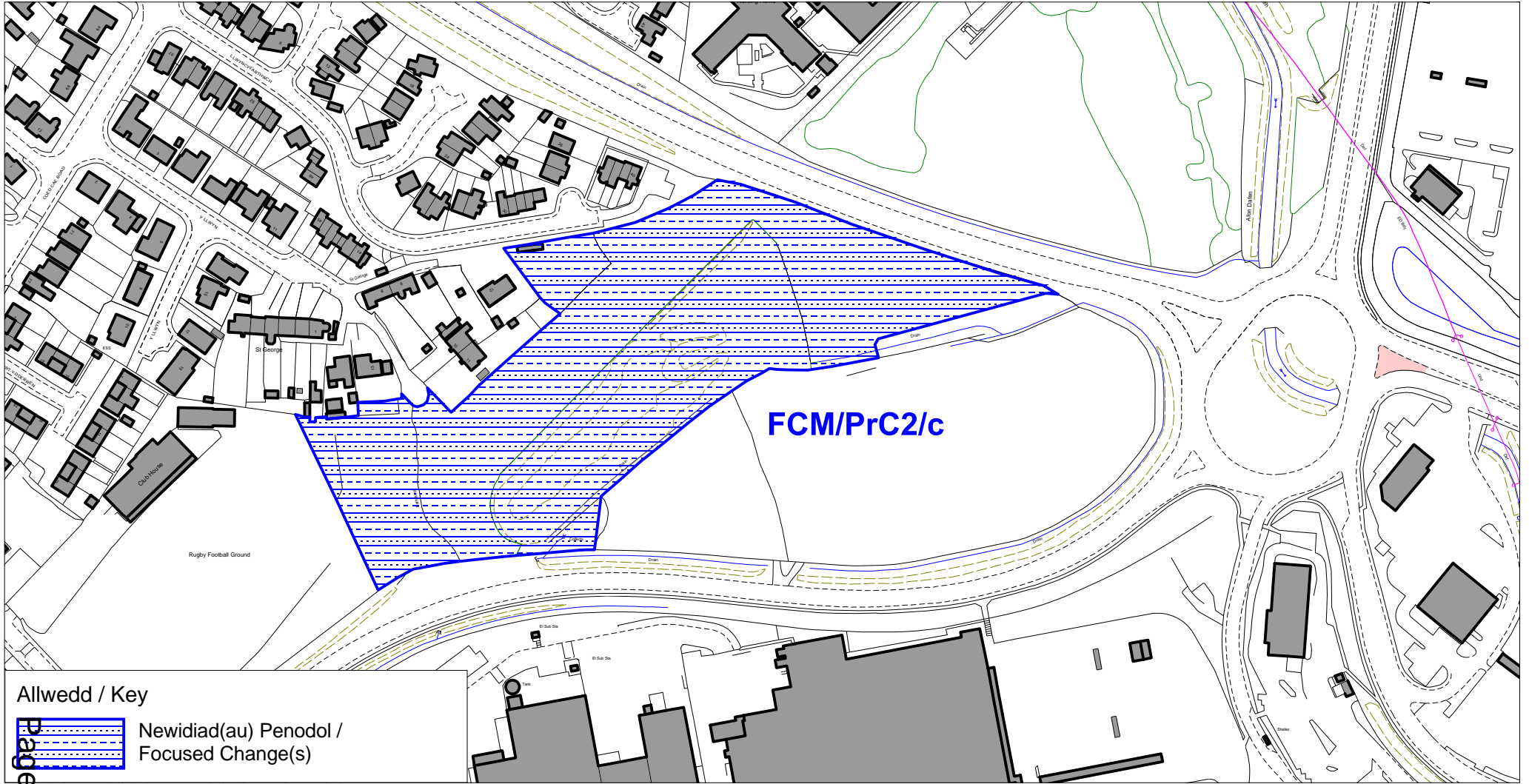
# Llanelli PrC2

Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
Deposit Revised Carmarthenshire Local Development Plan 2018-2033  
Newidiadau Penodol / Focused Changes

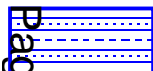


Scale 1:2500

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Environment Department,  
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Allwedd / Key

 Newidiad(au) Penodol / Focused Change(s)

Cyf. Newidiad(au) Penodol:  
Focused Change(s) Ref.:

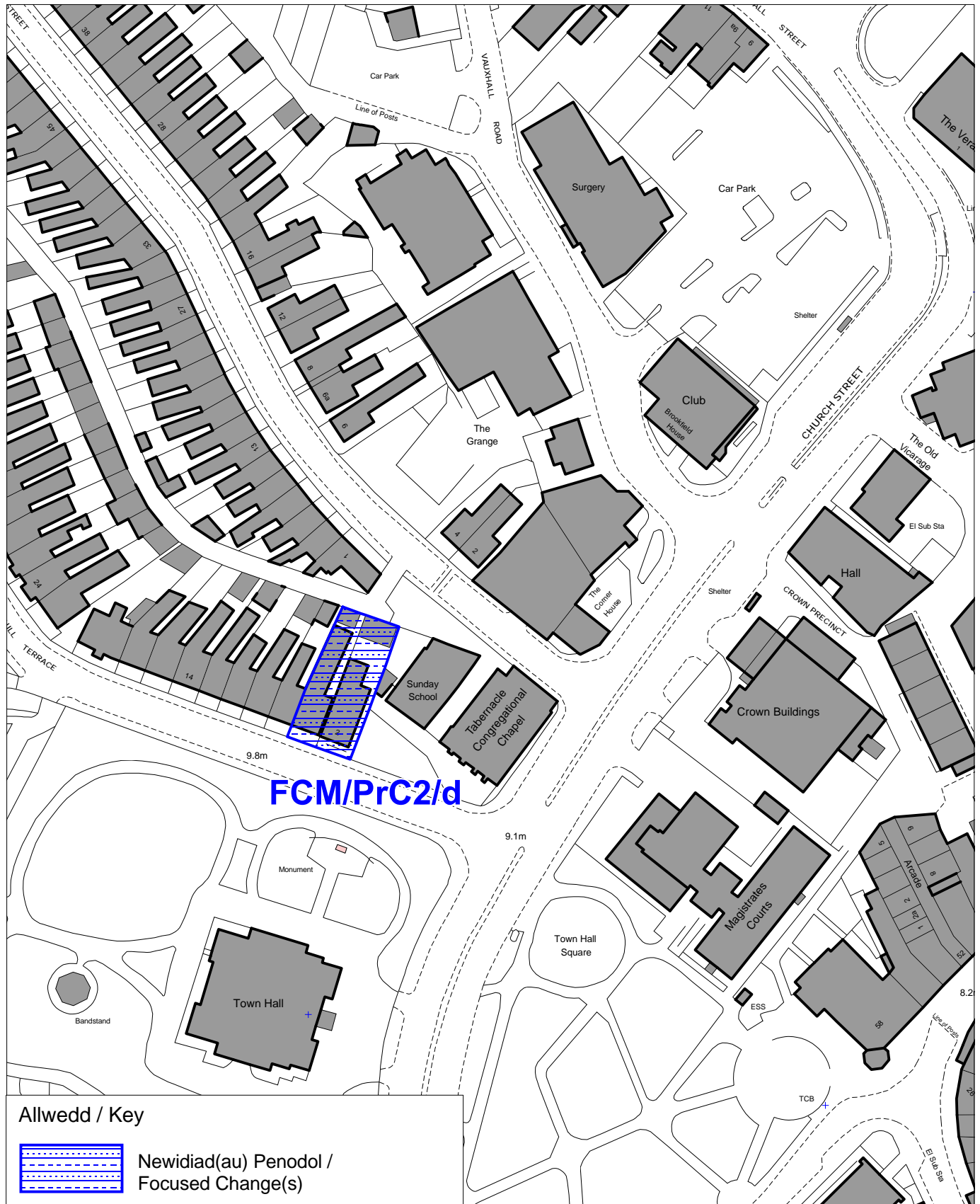
**FCM/PrC2/c**

# Llanelli PrC2

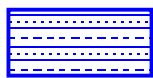
Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
 Deposit Revised Carmarthenshire Local Development Plan 2018-2033

Newidiadau Penodol / Focused Changes

Scale 1:1250



### Allwedd / Key



Newidiad(au) Penodol /  
 Focused Change(s)

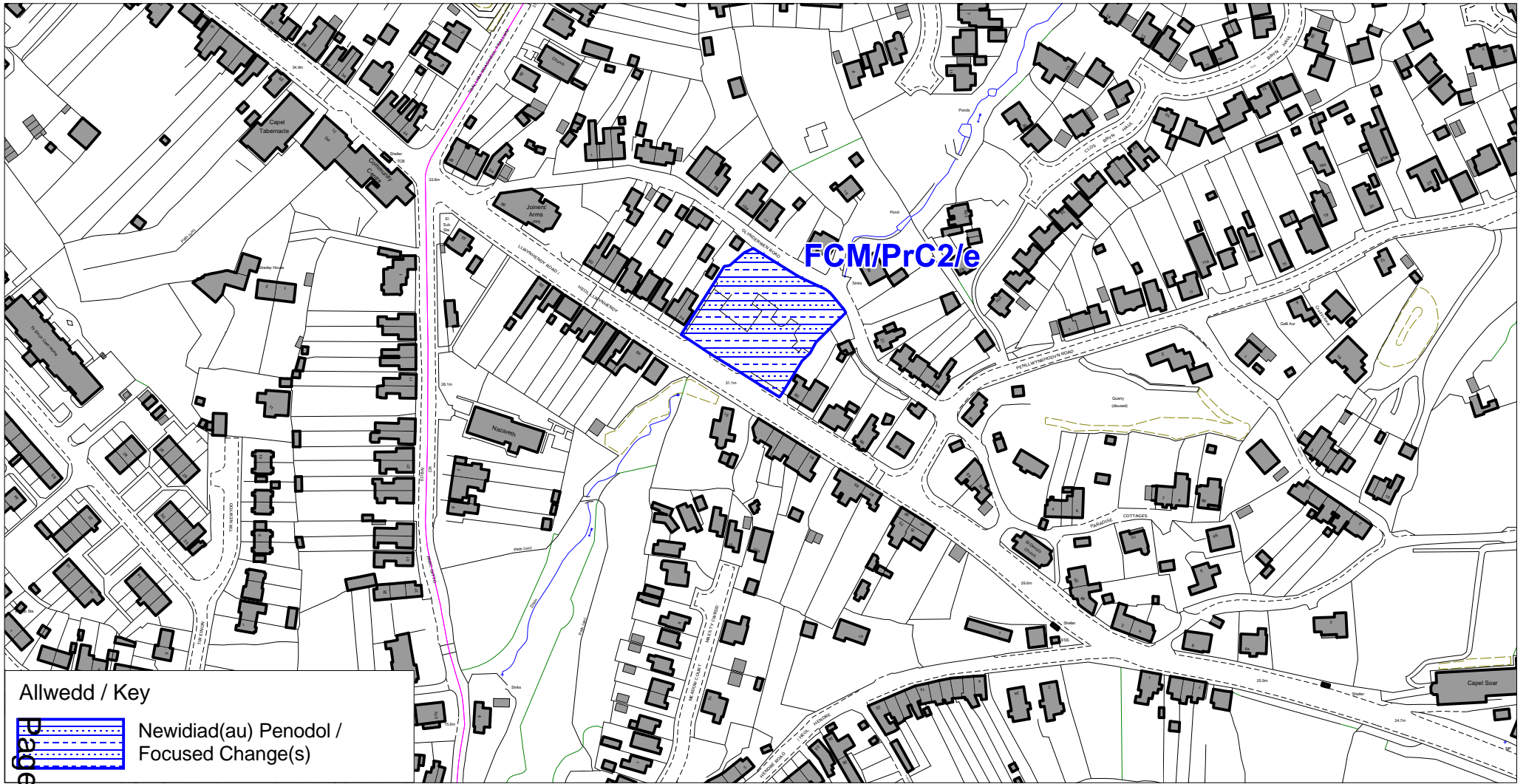
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 Focused Change(s) Ref.:

# Llanelli PrC2


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Deposit Revised Carmarthenshire Local Development Plan 2018-2033  
Newidiadau Penodol / Focused Changes



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### Allwedd / Key

 Newidiad(au) Penodol /  
Focused Change(s)

Cyf. Newidiad(au) Penodol:  
Focused Change(s) Ref.:

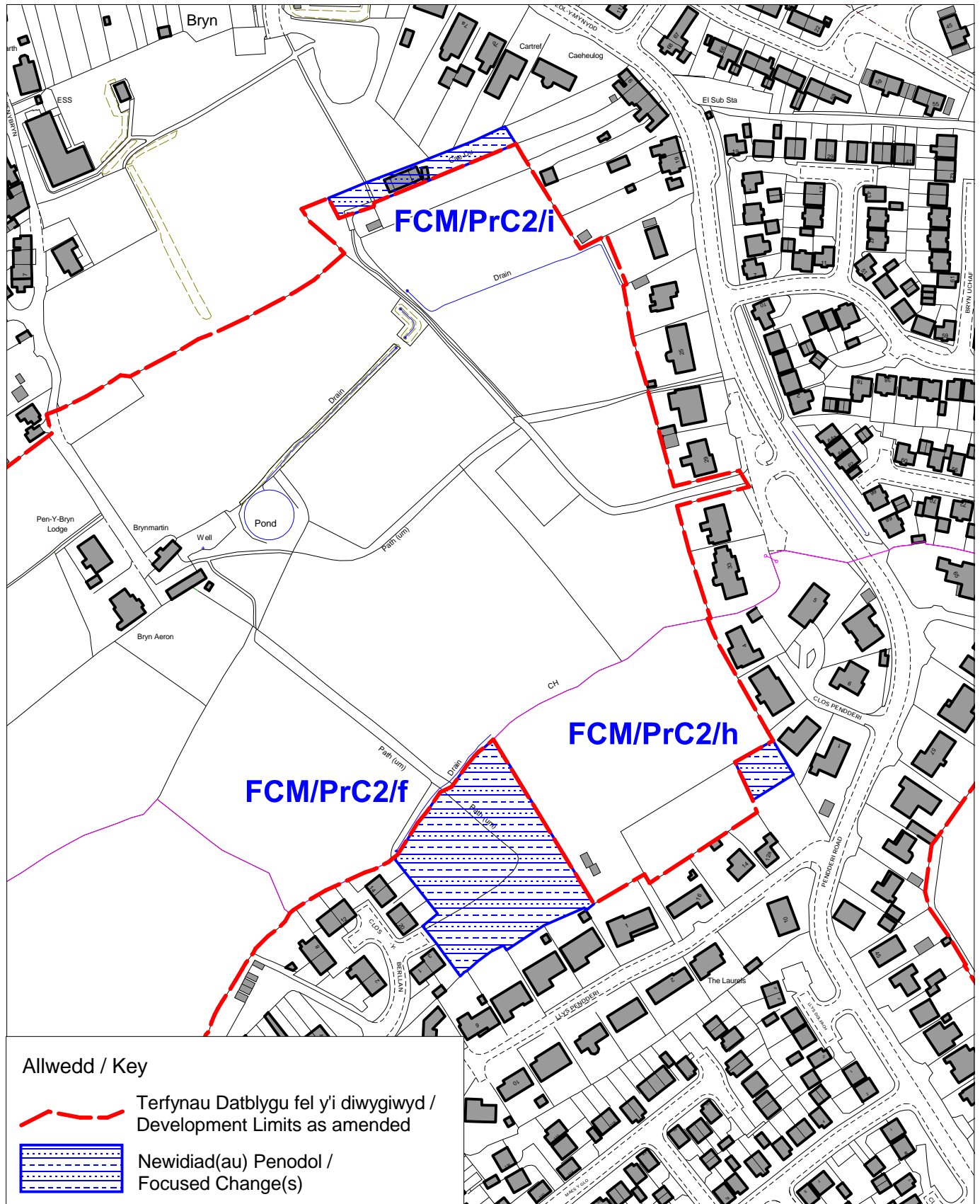
**FCM/PrC2/e**

# Llanelli PrC2

Cynllun Datblygu Lleol Adnewo Diwygiedig Sir Gaerfyrddin 2018-2033  
 Deposit Revised Carmarthenshire Local Development Plan 2018-2033

Newidiadau Penodol / Focused Changes

Scale 1:2500



### Allwedd / Key

- Terfynau Datblygu fel y'i diwygiwyd /  
Development Limits as amended
- Newidiad(au) Penodol /  
Focused Change(s)

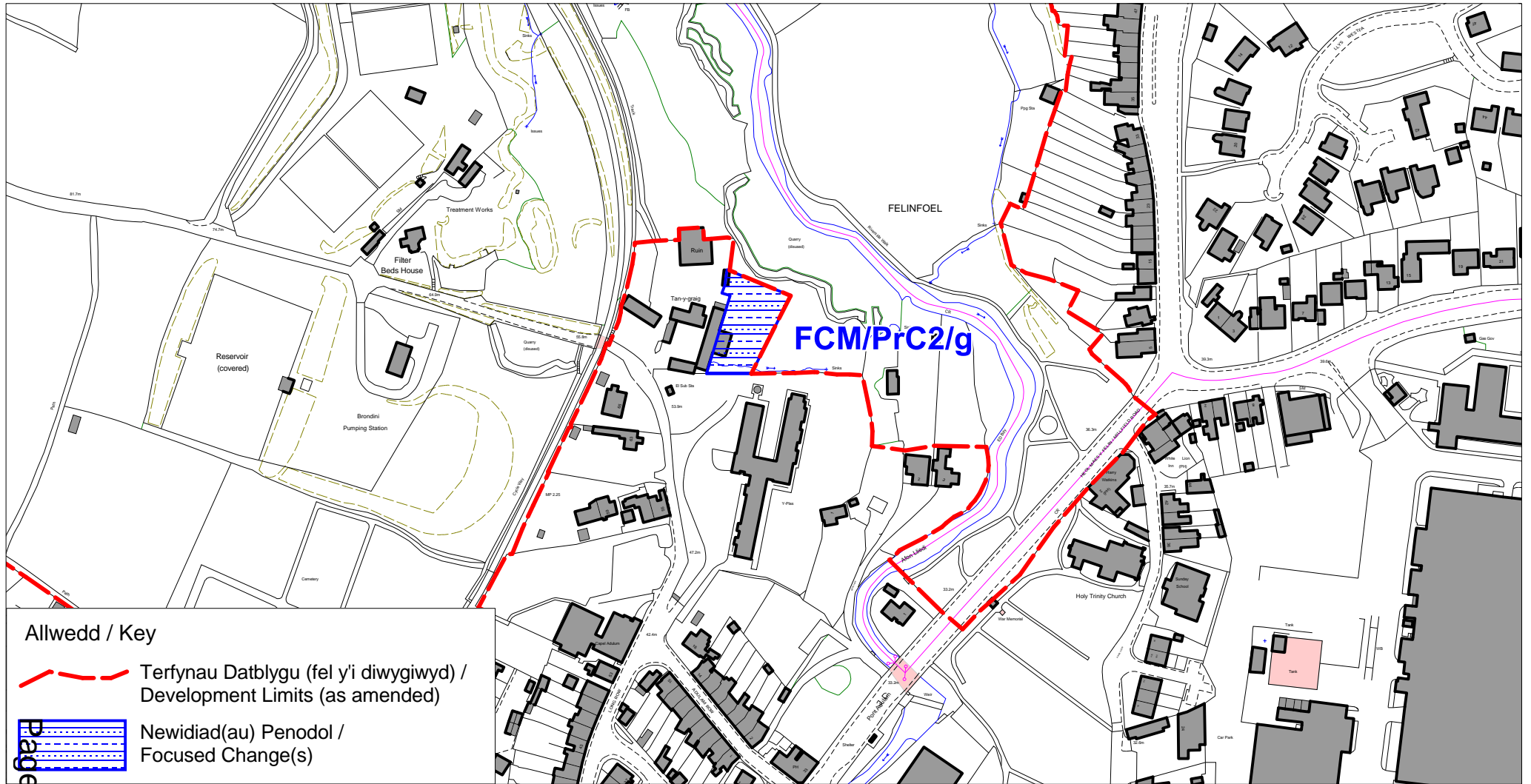
Cyf. Newidiad(au) Penodol: **FCM/PrC2/f,h,i**  
 Focused Change(s) Ref.:

# Llanelli PrC2

Cynllun Datblygu Lleol Adnewo Diwygiedig Sir Gaerfyrddin 2018-2033  
Deposit Revised Carmarthenshire Local Development Plan 2018-2033  
Newidiadau Penodol / Focused Changes

  
Scale 1:2500

Cyngor Sir Gaerfyrddin, Adran Yr Amgylchedd  
3 Heol Spilman, Caerfyrddin, SA31 1LE  
Carmarthenshire County Council,  
Environment Department,  
3 Spilman Street, Carmarthen, SA31 1LE



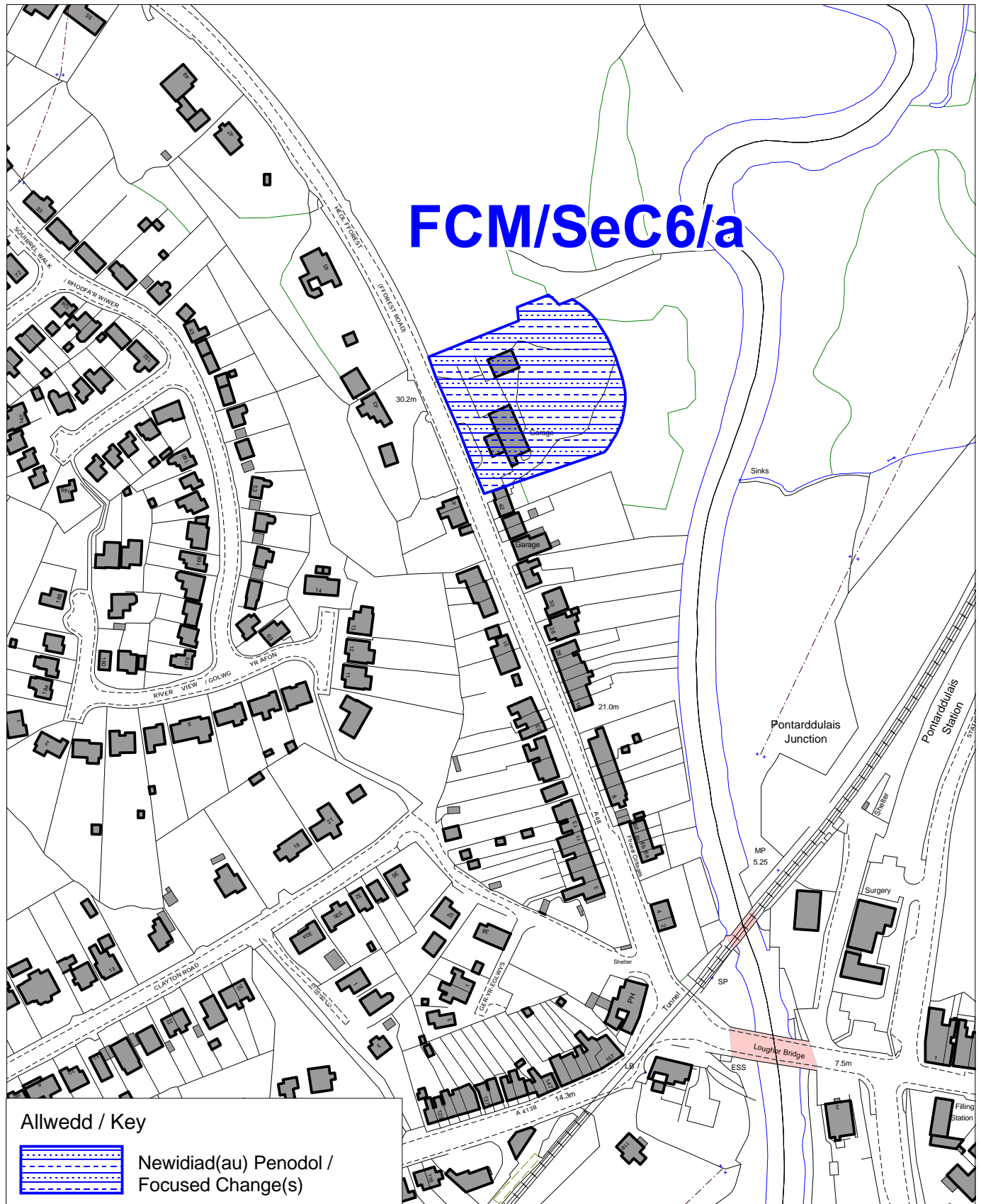
Cyf. Newidiad(au) Penodol: **FCM/PrC2/g**  
Focused Change(s) Ref.:

# Yr Hendy , Fforest SeC6

Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
Deposit Revised Carmarthenshire Local Development Plan 2018-2033

Newidiadau Penodol / Focused Changes

Scale 1:2500



Cyf. Newidiad(au) Penodol: **FCM/SeC6/a**  
Focused Change(s) Ref.:

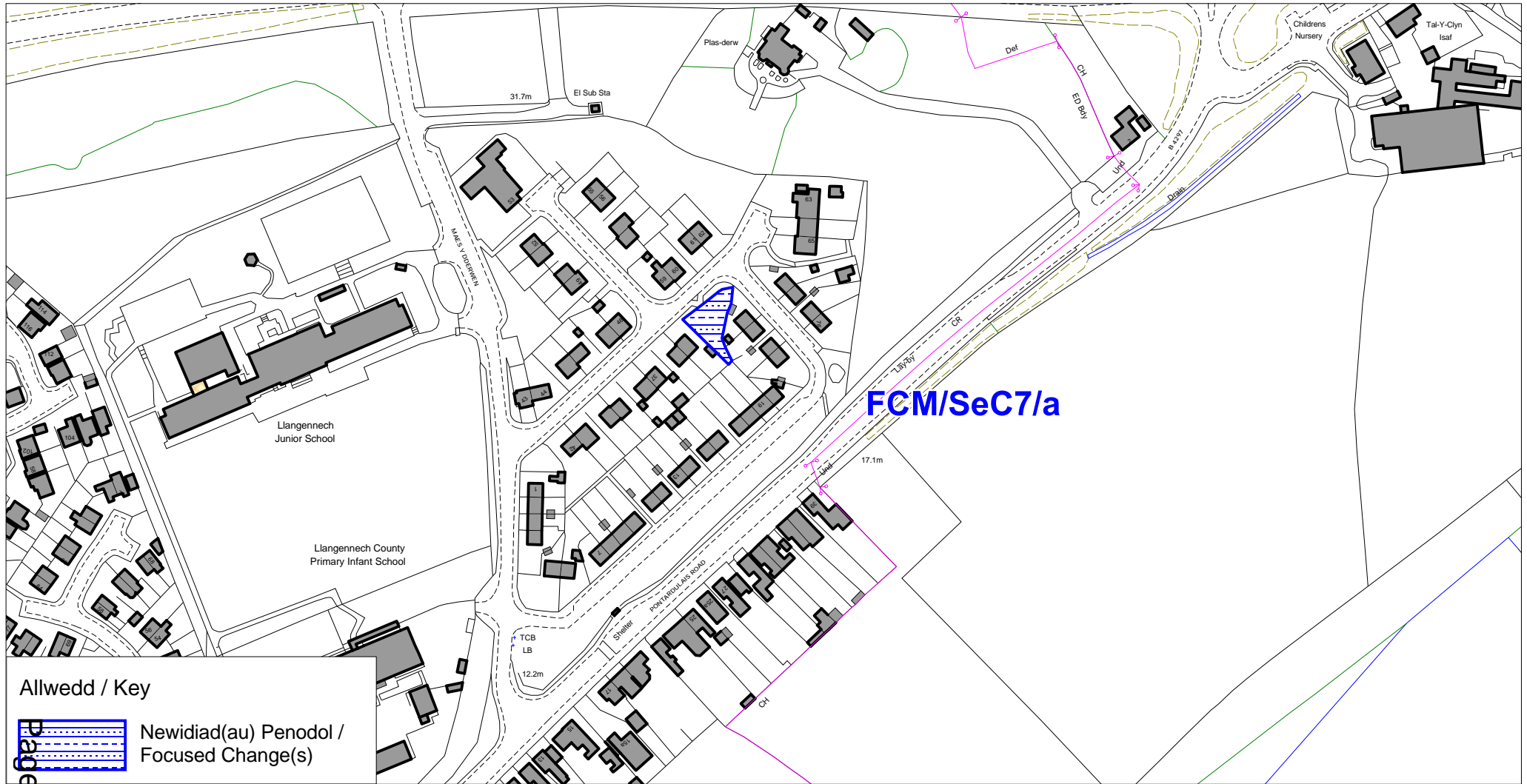


# Llangennech SeC7

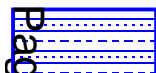
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Deposit Revised Carmarthenshire Local Development Plan 2018-2033  
Newidiadau Penodol / Focused Changes



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Environment Department,  
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## Allwedd / Key

 Newidiad(au) Penodol / Focused Change(s)

Cyf. Newidiad(au) Penodol: **FCM/SeC7/a**  
Focused Change(s) Ref.:

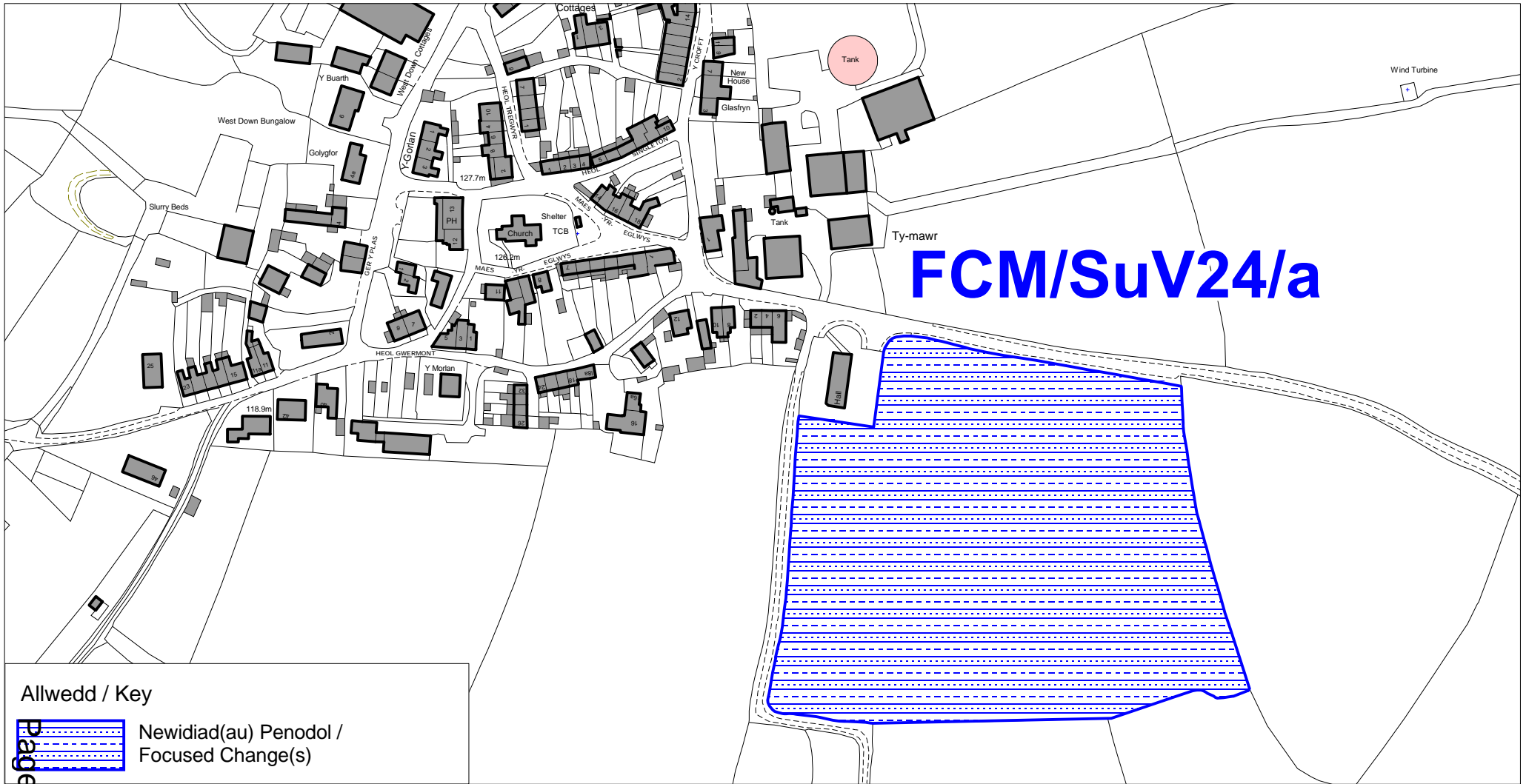
# Llan-saint / Llansaint SuV24

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Deposit Revised Carmarthenshire Local Development Plan 2018-2033  
Newidiadau Penodol / Focused Changes

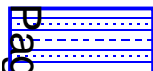
Cyngor Sir Caerfyrddin, Adran Yr Amgylchedd  
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Scale 1:2500



## Allwedd / Key

 Newidiad(au) Penodol / Focused Change(s)

Cyf. Newidiad(au) Penodol: **FCM/SuV24/a**  
Focused Change(s) Ref.:

Change Ref	Settlement reference	Site Ref (where applicable)	Description of Change	Reason/Comment	Source	
					Representation	Council Change
<b>Cluster 3</b>						
FCM/Pr C3/a	Cross Hands	PrC3/E2	Remove rectangular portion of Employment allocation PrC3/E2 in the south east (candidate site SR/031/004, CA0402)	In response to a representation from a statutory consultee.	<b>3683</b>	
FCM/Pr C3/b	Cross Hands	PrC3/E4	Remove triangular portion (in the south east) of Employment allocation PrC3/E4.	In response to a representation from a statutory consultee.	<b>3685</b>	
FCM/Pr C3/c	Ammanford		Identify the industrial units along Maesquarre Road as an existing employment site (as identified in the Employment Land Review ELR, 2019).	To reflect existing employment activities.	<b>N/A</b>	✓
FCM/Pr C3/d	Ammanford		Allocate new site under policy HOM1 – Housing Allocations at Llys Dolgader for 9 units.  Consequential amendment to the development limits .  Reference should be had to the Schedule of Focused Changes: Written Statement.	To reflect the development of the site.		✓
FCM/Pr C3/e	Ammanford		Remove the open space designation from the parcel of land at Heol Llwyd.	To reflect the current car park at the location and in response to a representation.	<b>3188</b>	
FCM/Pr C3/f	Llandybie		Amend allocation to remove land within the Daley Homes site.  Consequential amendment to policy HOM1 and Appendix 7.	To reflect the difference in land ownership and developer.		✓
FCM/Pr C3/g	Cefneithin		Amend development limits to include Candidate Site AS/026/005.	To allow small scale/single plot development.	<b>3591</b>	
FCM/Pr C3/h	Drefach		Remove the open space designation from the parcel of land at Rose Cottage.	To reflect that the site is not an open space use.	<b>3247</b> <b>3782</b>	

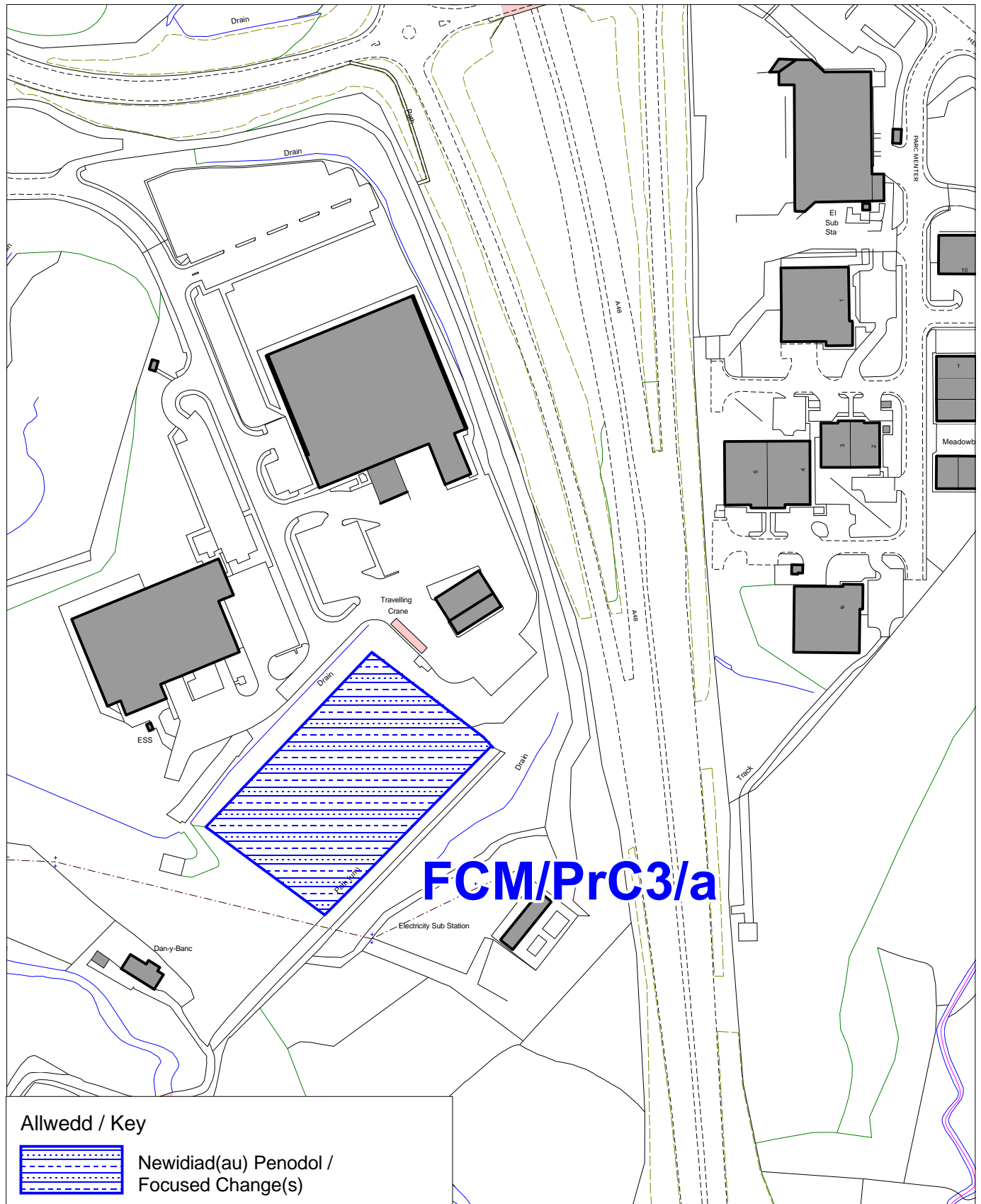
Change Ref	Settlement reference	Site Ref (where applicable)	Description of Change	Reason/Comment	Source	
					Representation	Council Change
FCM/Pr C3/i	Drefach		Include land into the development limits.	To reflect the garden area to the rear of the property.		✓
FCM/Pr C3/j	Drefach		Remove development limits surrounding the recreation ground to the NE of Heol Ddu.	To reflect their location and position within Drefach and in the interests of consistency.		✓
FCM/Pr C3/k	Drefach		Remove development limits surrounding the open space annotation to the west of Heol Cwmmawr.	To reflect their location and position within Drefach and in the interests of consistency.		✓
FCM/Pr C3/l	Drefach		Annotate land at Bron yr Ynn, Drefach as open space.	To reflect the open space on the land		✓
FCM/Se C10/a	Garnant		Land off Bishop Road (site T3/8/h9 in LDP1). Bring the development limits back to the frontage land	To reflect planning permission for 4 dwellings under E/34859.	<b>N/A</b>	✓

# Cross Hands PrC3

Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
Deposit Revised Carmarthenshire Local Development Plan 2018-2033

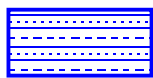
Newidiadau Penodol / Focused Changes

Scale 1:2500



**FCM/PrC3/a**

### Allwedd / Key



Newidiad(au) Penodol /  
Focused Change(s)

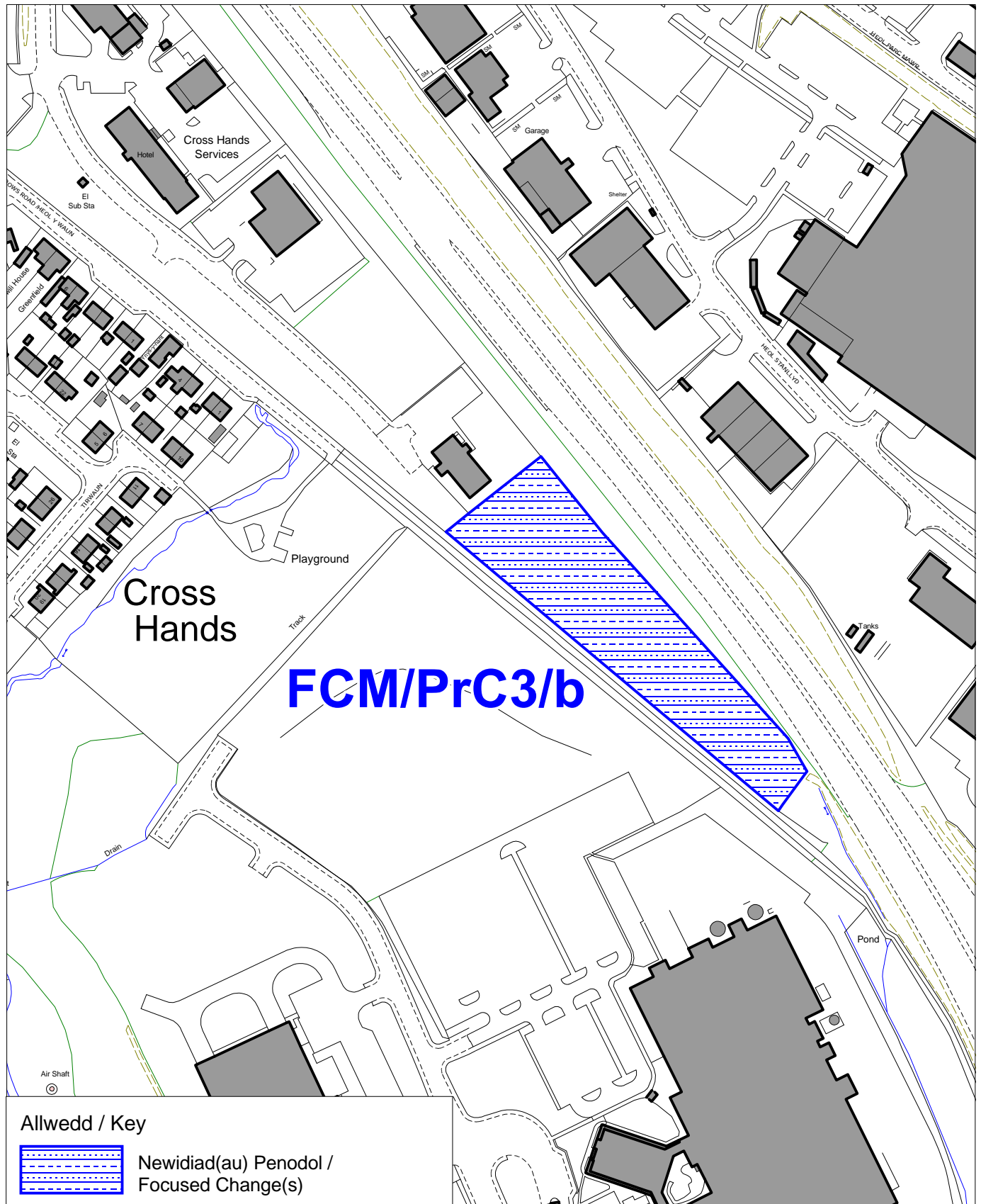
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Focused Change(s) Ref.:

# Cross Hands PrC3

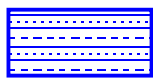
Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
Deposit Revised Carmarthenshire Local Development Plan 2018-2033

Newidiadau Penodol / Focused Changes

Scale 1:2500



### Allwedd / Key



Newidiad(au) Penodol /  
Focused Change(s)

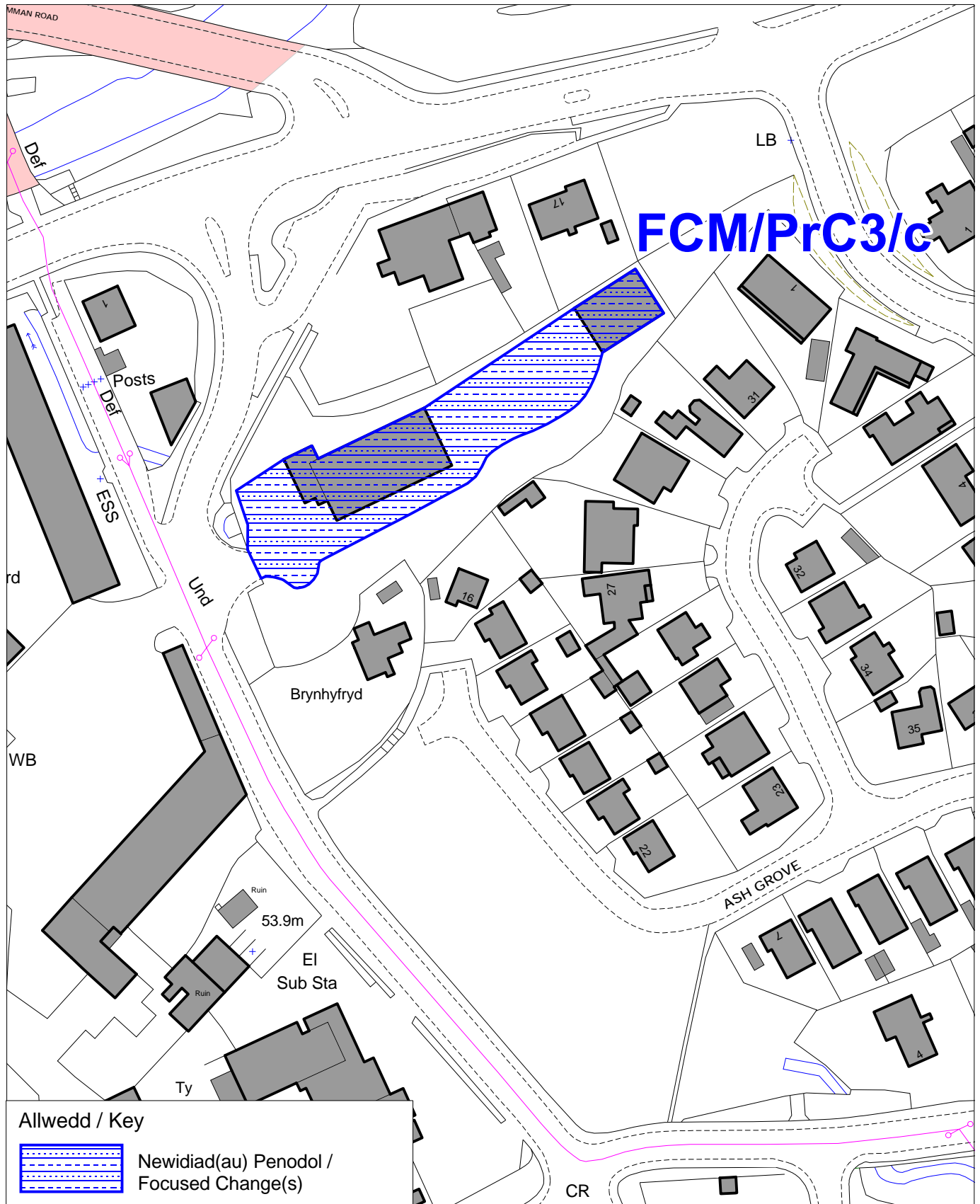
Cyf. Newidiad(au) Penodol: **FCM/PrC3/b**  
Focused Change(s) Ref.:

# Rhydaman / Ammanford PrC3

Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
Deposit Revised Carmarthenshire Local Development Plan 2018-2033

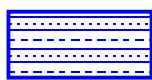
Newidiadau Penodol / Focused Changes

Scale 1:1250



**FCM/PrC3/c**

### Allwedd / Key

 Newidiad(au) Penodol / Focused Change(s)

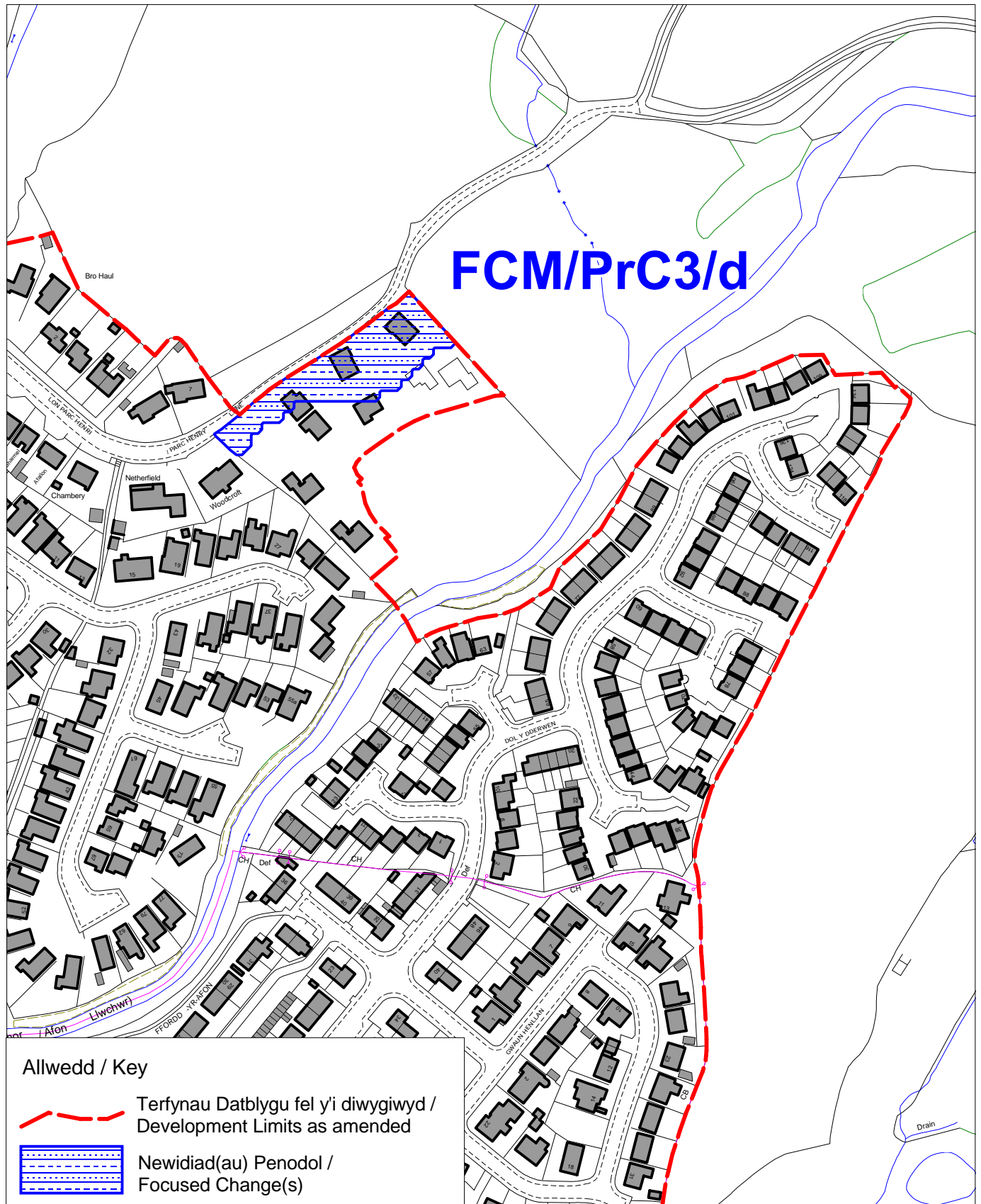
Cyf. Newidiad(au) Penodol: **FCM/PrC3/c**  
Focused Change(s) Ref.:

# Rhydaman / Ammanford PrC3

Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
Deposit Revised Carmarthenshire Local Development Plan 2018-2033

Newidiadau Penodol / Focused Changes

Scale 1:2500



Cyf. Newidiad(au) Penodol: **FCM/PrC3/d**  
Focused Change(s) Ref.:

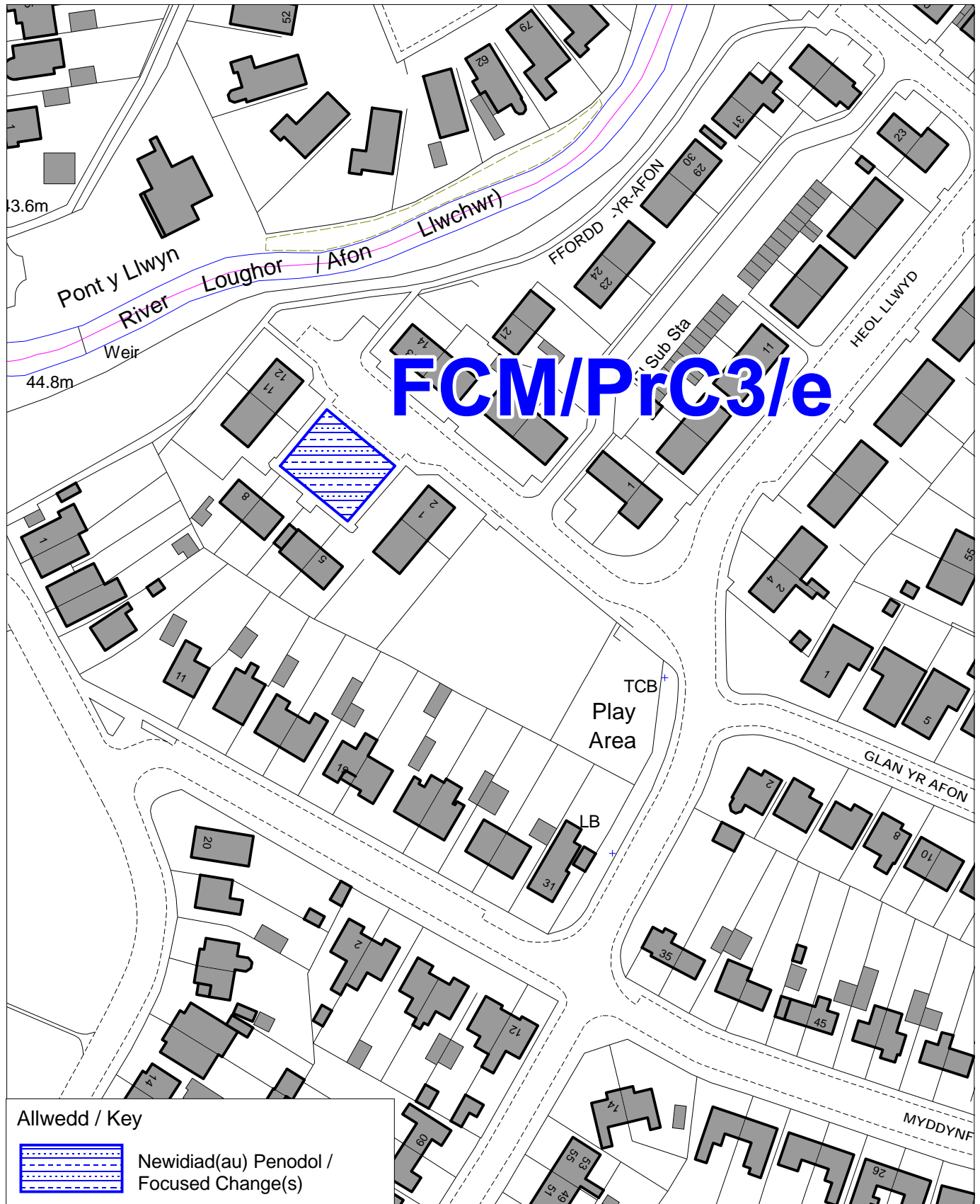


# Rhydaman / Ammanford PrC3

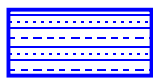
Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
Deposit Revised Carmarthenshire Local Development Plan 2018-2033

Newidiadau Penodol / Focused Changes

Scale 1:1250



### Allwedd / Key



Newidiad(au) Penodol /  
Focused Change(s)

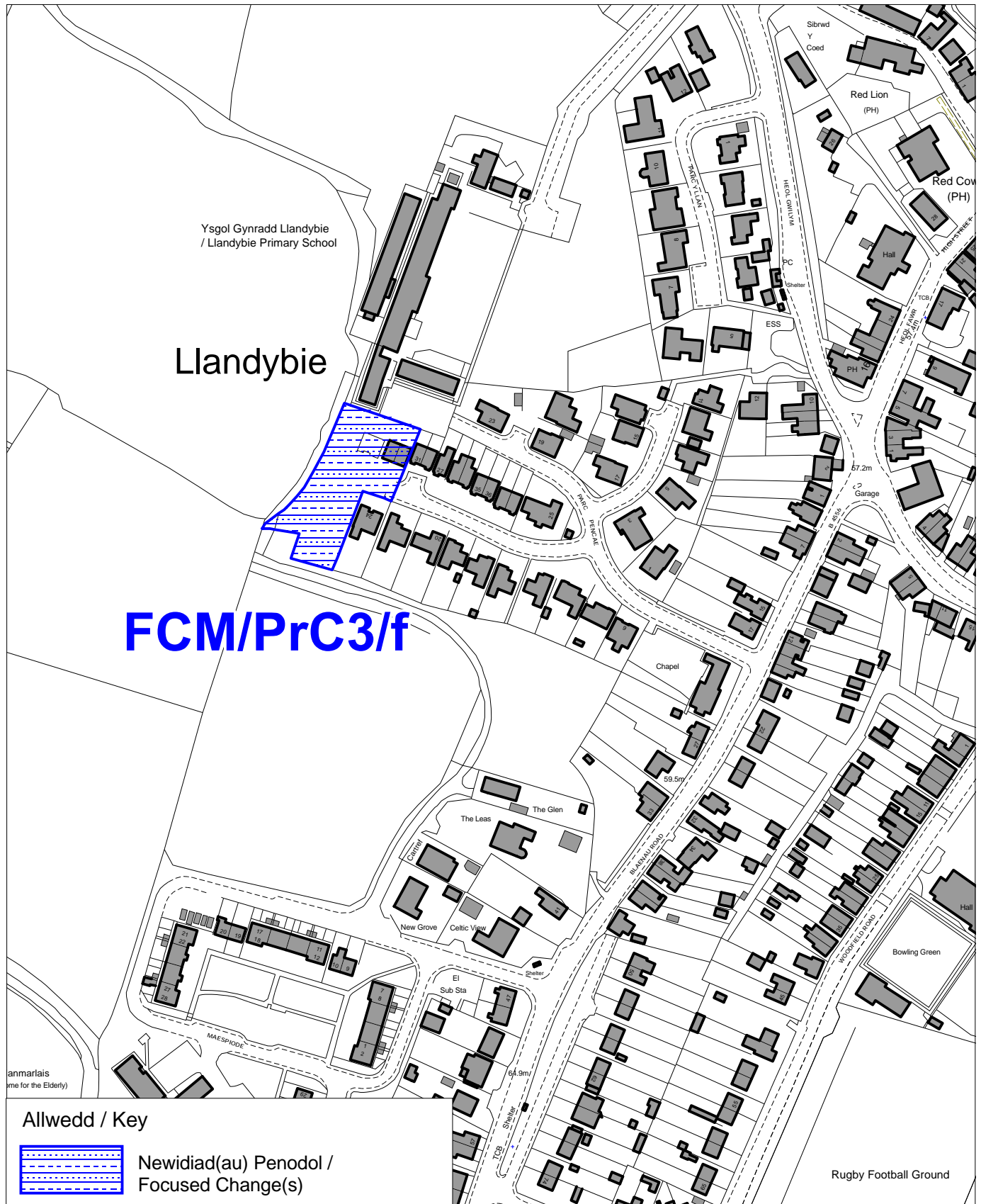
Cyf. Newidiad(au) Penodol: **FCM/PrC3/e**  
Focused Change(s) Ref.:

# Llandybie PrC3

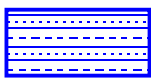
Cynllun Datblygu Lleol Adnewid Diwygiedig Sir Gaerfyrddin 2018-2033  
Deposit Revised Carmarthenshire Local Development Plan 2018-2033

Newidiadau Penodol / Focused Changes

Scale 1:2500



### Allwedd / Key



Newidiad(au) Penodol /  
Focused Change(s)

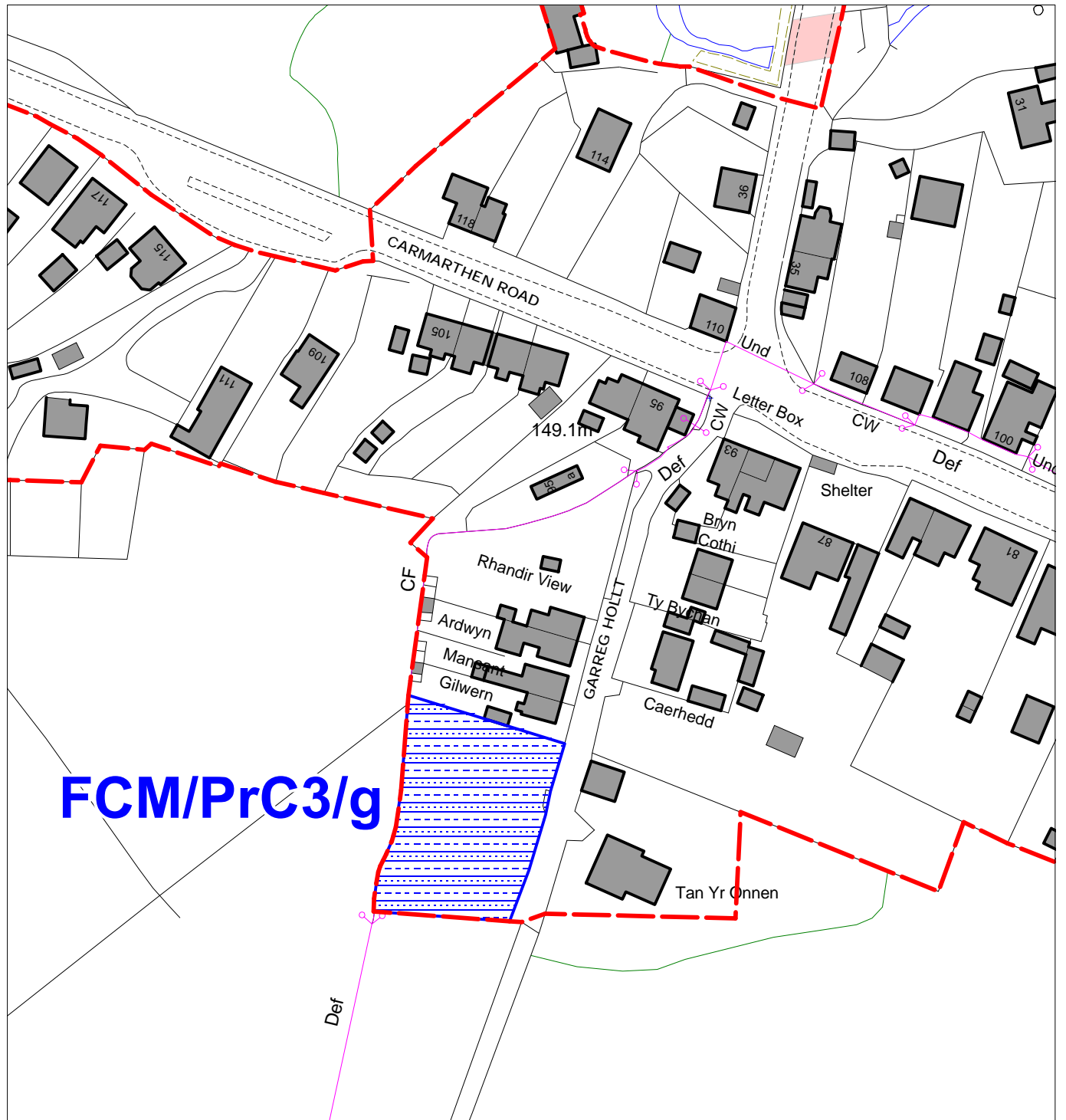
Cyf. Newidiad(au) Penodol: **FCM/PrC3/f**  
Focused Change(s) Ref.:

# Cefneithin PrC3

Cynllun Datblygu Lleol Adnewo Diwygiedig Sir Gaerfyrddin 2018-2033  
 Deposit Revised Carmarthenshire Local Development Plan 2018-2033

Newidiadau Penodol / Focused Changes

Scale 1:125



Allwedd / Key

- Terfynau Datblygu fel y'i diwygiwyd / Development Limits as amended
- Newidiad(au) Penodol / Focused Change(s)

Cyf. Newidiad(au) Penodol: **FCM/PrC3/g**  
 Focused Change(s) Ref.:

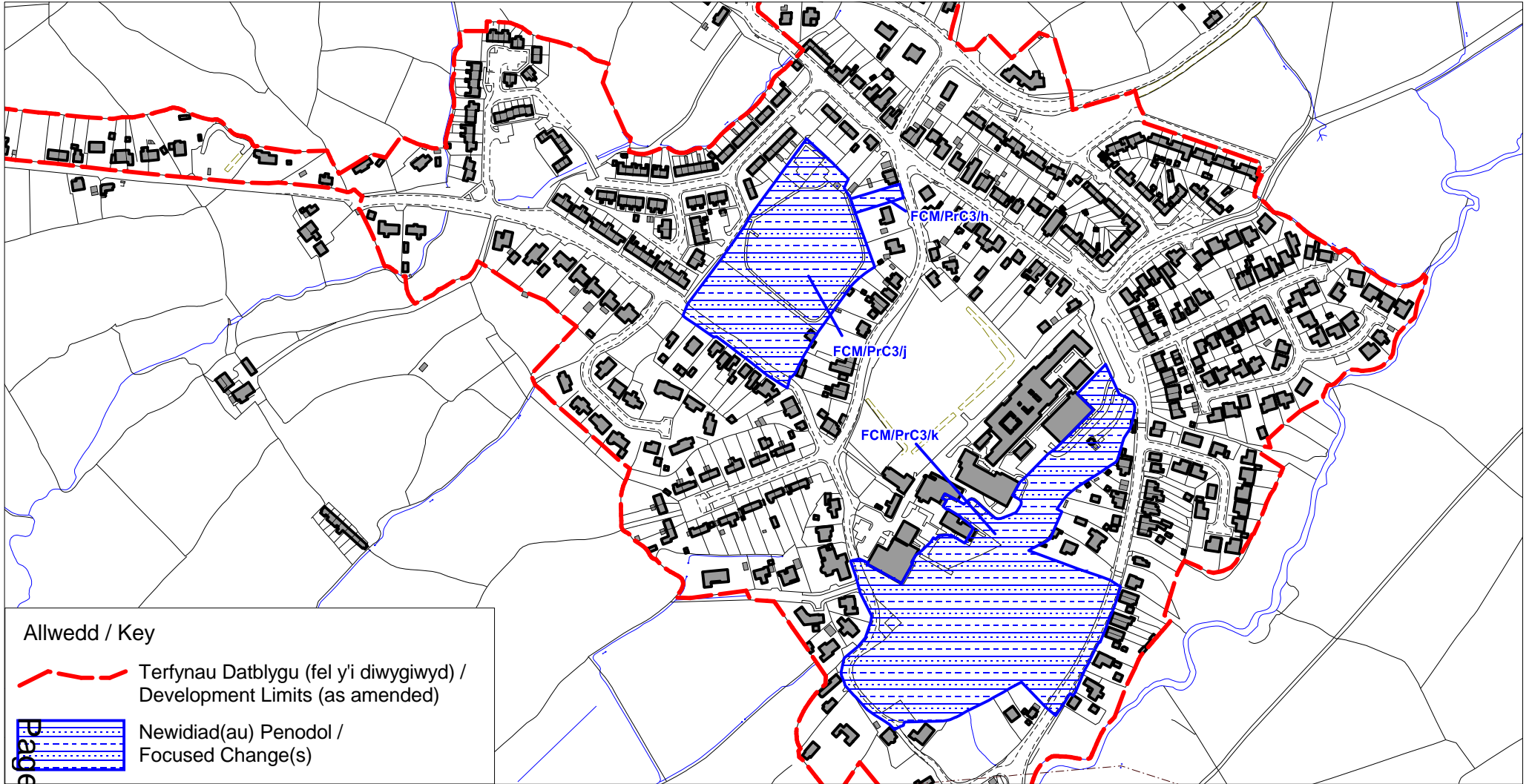
# Drefach PrC3

Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
Deposit Revised Carmarthenshire Local Development Plan 2018-2033  
Newidiadau Penodol / Focused Changes




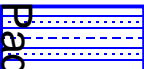
Scale 1:5000

Cyngor Sir Gaerfyrddin, Adran Yr Amgylchedd  
3 Heol Spilman, Caerfyrddin, SA31 1LE  
Carmarthenshire County Council,  
Environment Department,  
3 Spilman Street, Carmarthen, SA31 1LE



## Allwedd / Key

 Terfynau Datblygu (fel y'i diwygiwyd) /  
Development Limits (as amended)


 Newidiad(au) Penodol /  
Focused Change(s)

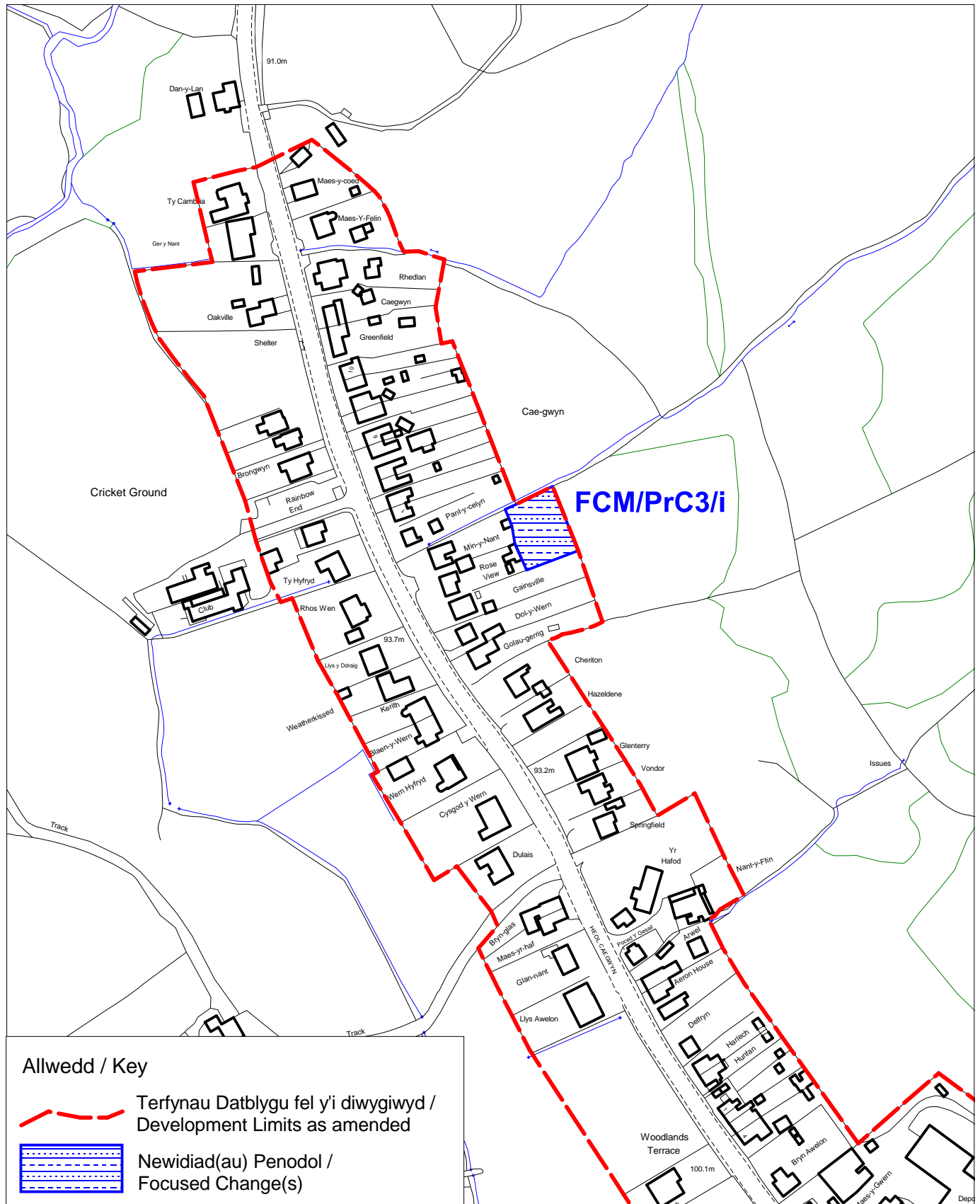
Page 13/24  
Cyf. Newidiad(au) Penodol: **FCM/PrC3/h,j,k**  
Focused Change(s) Ref.:

# Drefach PrC3


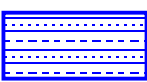
Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
 Deposit Revised Carmarthenshire Local Development Plan 2018-2033

Newidiadau Penodol / Focused Changes

Scale 1:250 



**Allwedd / Key**

-  Terfynau Datblygu fel y'i diwygiwyd / Development Limits as amended
-  Newidiad(au) Penodol / Focused Change(s)

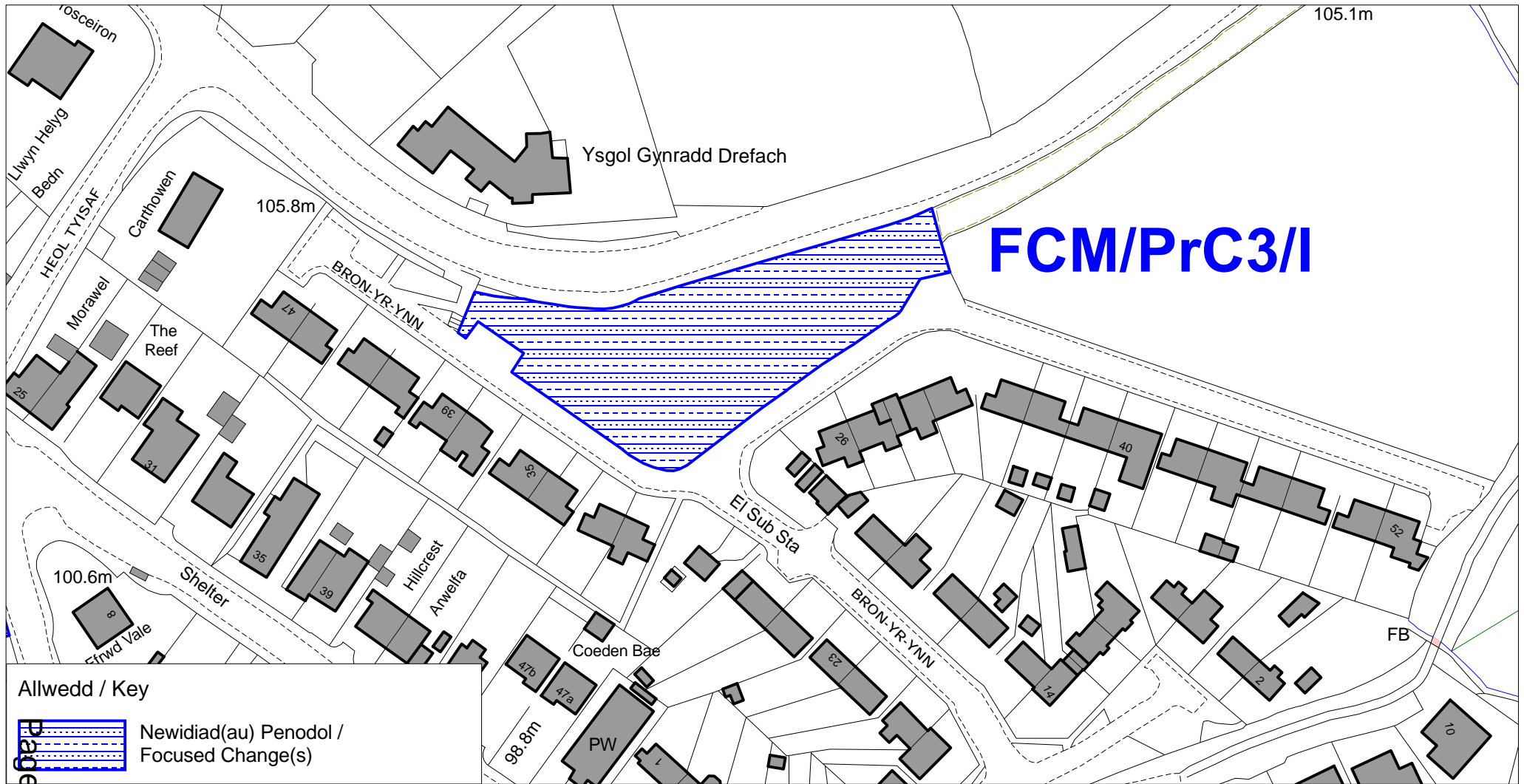
Cyf. Newidiad(au) Penodol: **FCM/PrC3/i**  
 Focused Change(s) Ref.:

# Drefach PrC3

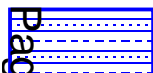
Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
Deposit Revised Carmarthenshire Local Development Plan 2018-2033  
Newidiadau Penodol / Focused Changes



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Carmarthenshire County Council,  
Environment Department,  
3 Spilman Street, Carmarthen, SA31 1LE



### Allwedd / Key

 Newidiad(au) Penodol / Focused Change(s)

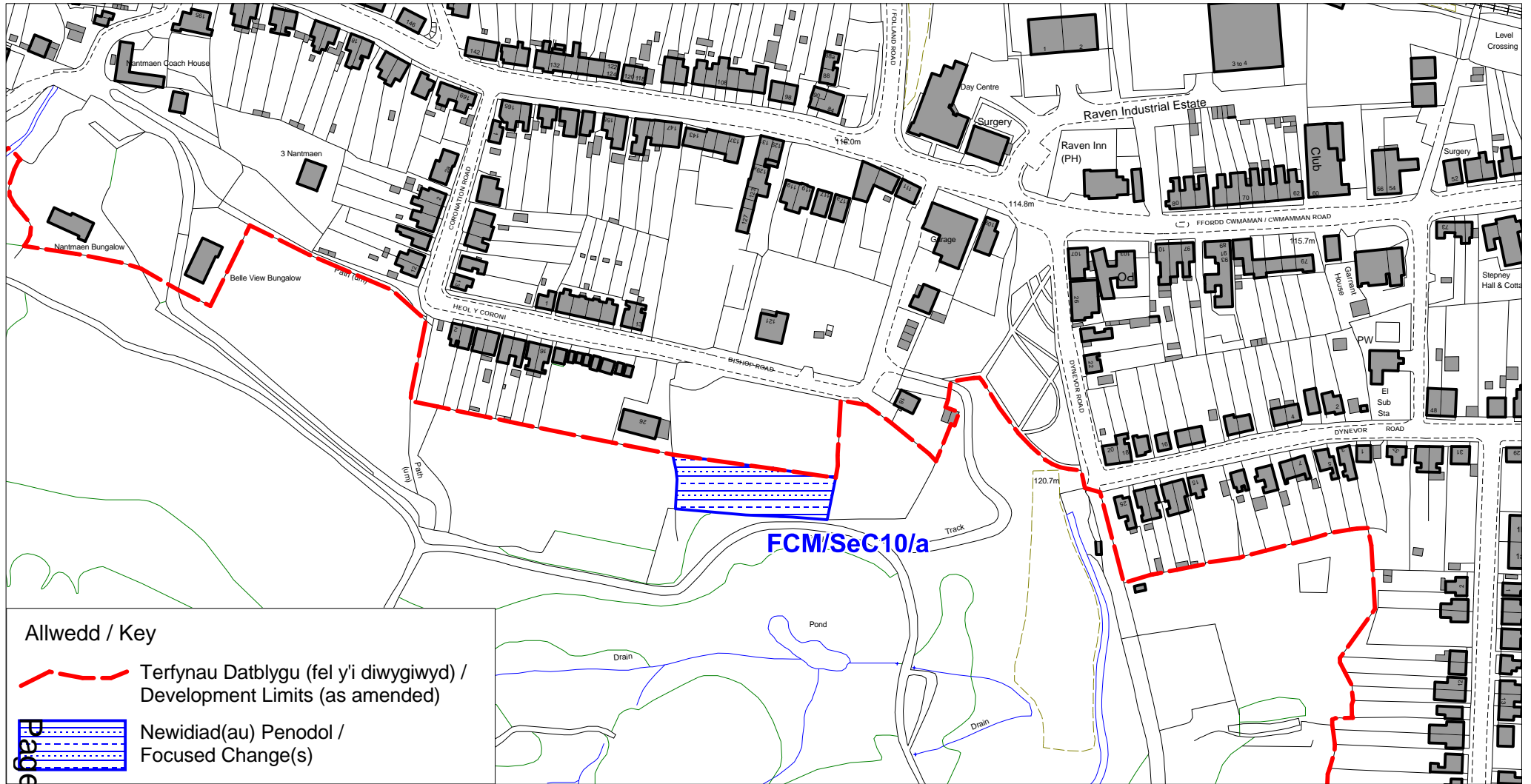
Cyf. Newidiad(au) Penodol: **FCM/PrC3/I**  
Focused Change(s) Ref.:

# Garnant SeC10


Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
 Deposit Revised Carmarthenshire Local Development Plan 2018-2033  
 Newidiadau Penodol / Focused Changes

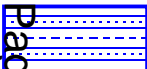


Cyngor Sir Caerfyrddin, Adran Yr Amgylchedd  
 3 Heol Spilman, Caerfyrddin, SA31 1LE  
 Carmarthenshire County Council,  
 Environment Department,  
 3 Spilman Street, Carmarthen, SA31 1LE



## Allwedd / Key

 Terfynau Datblygu (fel y'i diwygiwyd) /  
 Development Limits (as amended)

 Newidiad(au) Penodol /  
 Focused Change(s)

Cyf. Newidiad(au) Penodol:  
 Focused Change(s) Ref.:

**FCM/SeC10/a**

Change Ref	Settlement reference	Site Ref (where applicable)	Description of Change	Reason/Comment	Source	
					Representation	Council Change
<b>Cluster 4</b>						
FCM/Se C13/a	Llanybydder		Identify Ty Mawr as an existing employment site (as identified in LDP1 and the Employment Land Review ELR, 2019).	To reflect existing employment activities.	<b>N/A</b>	✓
FCM/Su V32/a	Waungilwen		Amend development limits in Waungilwen to include site AS/160/003.	To allow for an appropriate small scale residential development to take place.	<b>3834</b>	
FCM/Su V33/a	Llangeler	SuV33/h1	Remove allocation from eastern part but retain this land within the development limits .  (consequential changes to the Written Statement – Reference should be had to the Schedule of Focused Changes: Written Statement).	The landowner has no desire to develop this land for housing.	<b>3195, 3372</b>	
FCM/Su V35/a	Llanllwni		Amend development limits in Llanllwni to include site AS/099/006.	A solution to the development of the land has been submitted as a planning application.	<b>3503</b>	
FCM/Su V35/b	Llanllwni		Amend development limits in Llanllwni to include site AS/099/010.	To allow for an appropriate small scale residential development to take place.	<b>4500</b>	

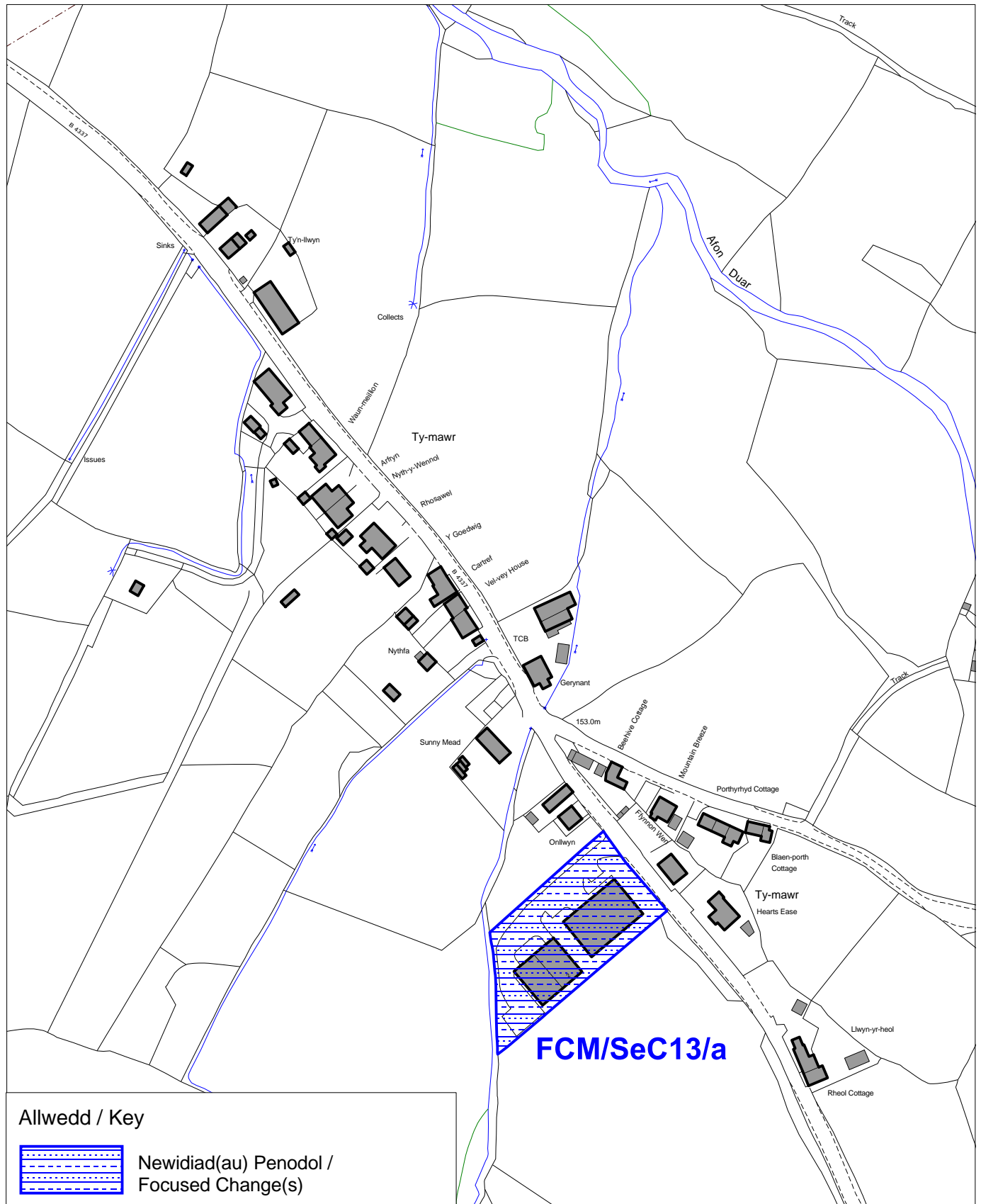


# Ty Mawr, Llanybydder SeC13

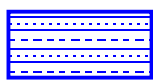
Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
Deposit Revised Carmarthenshire Local Development Plan 2018-2033

Newidiadau Penodol / Focused Changes

Scale 1:2500



## Allwedd / Key



Newidiad(au) Penodol /  
Focused Change(s)

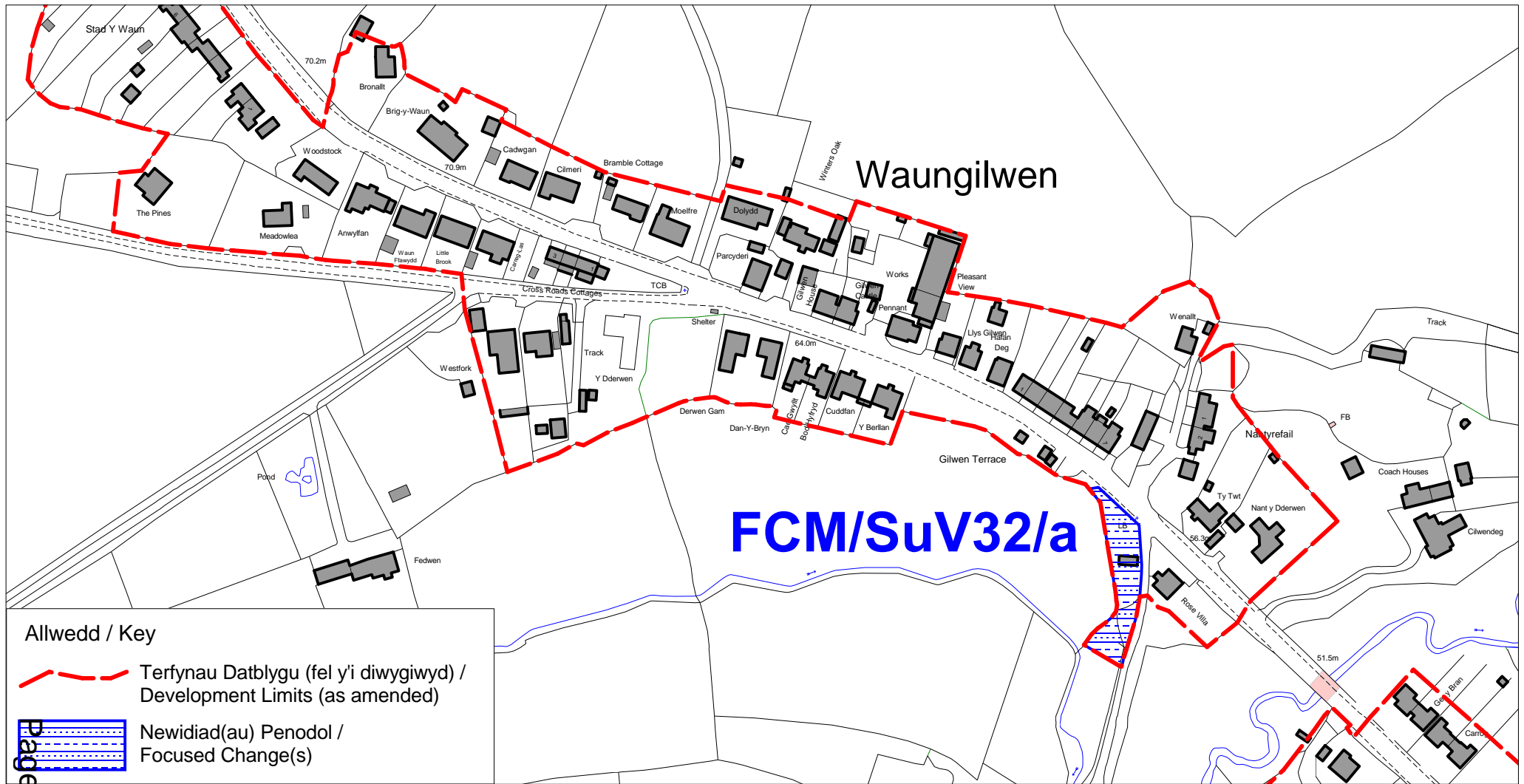
Cyf. Newidiad(au) Penodol: **FCM/SeC13/a**  
Focused Change(s) Ref.:

# Waungilwen SuV32

Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
 Deposit Revised Carmarthenshire Local Development Plan 2018-2033  
 Newidiadau Penodol / Focused Changes



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 Carmarthenshire County Council,  
 Environment Department,  
 3 Spilman Street, Carmarthen, SA31 1LE



**Allwedd / Key**

- Terfynau Datblygu (fel y'i diwygiwyd) / Development Limits (as amended)
- Newidiad(au) Penodol / Focused Change(s)

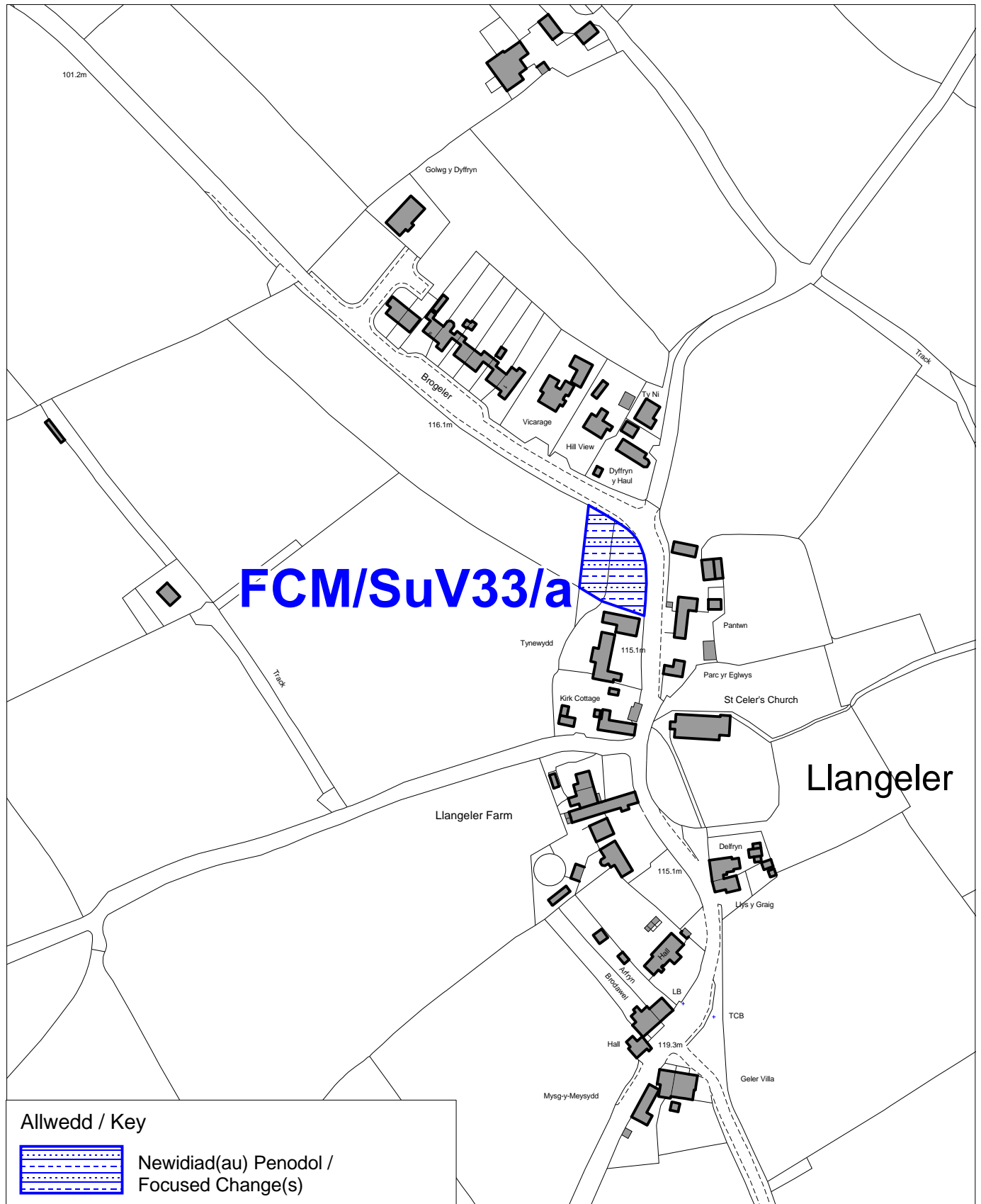
Cyf. Newidiad(au) Penodol: **FCM/SuV32/a**  
 Focused Change(s) Ref.:

# Llangeler SuV33

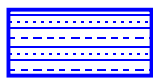
Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
Deposit Revised Carmarthenshire Local Development Plan 2018-2033

Newidiadau Penodol / Focused Changes

Scale 1:2500



## Allwedd / Key



Newidiad(au) Penodol /  
Focused Change(s)

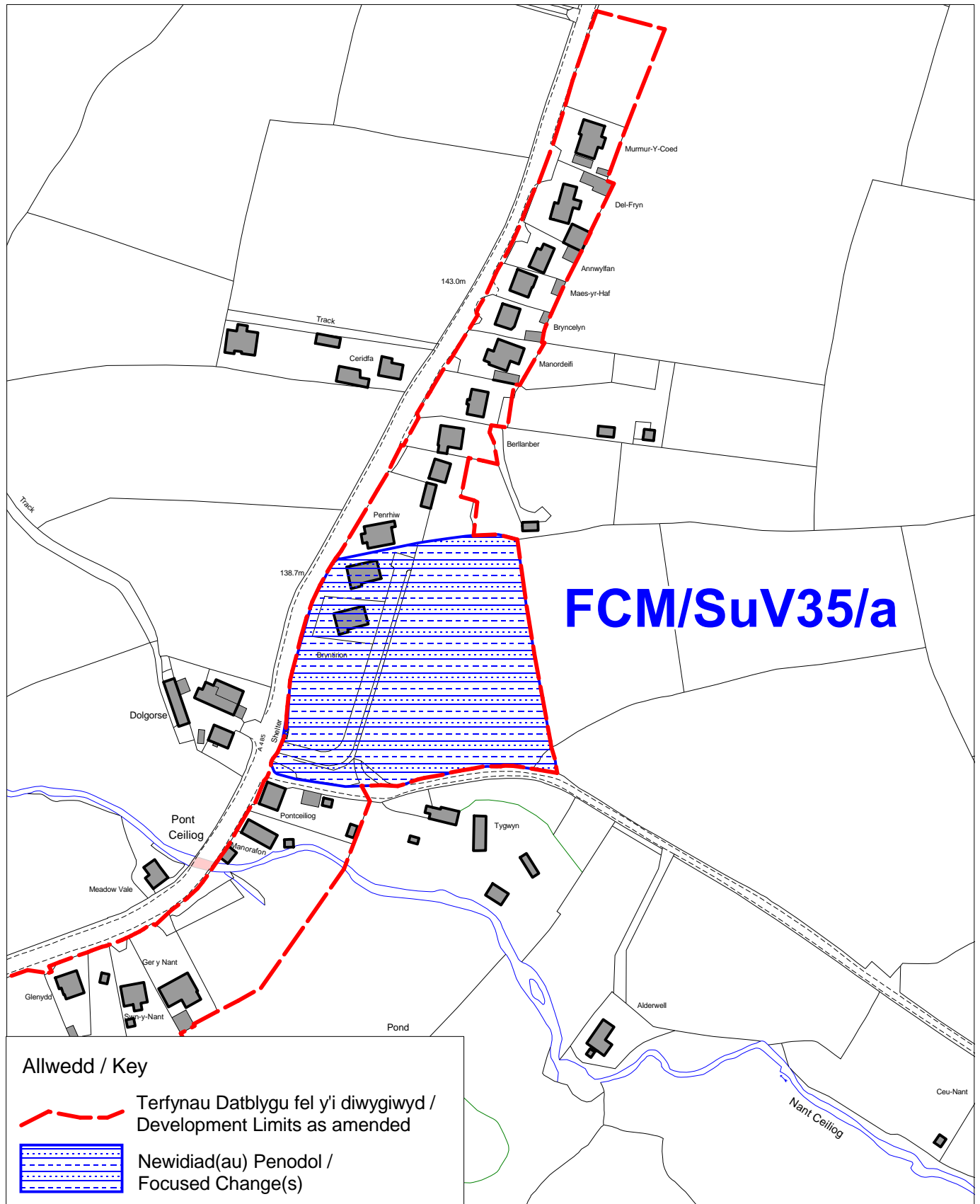
Cyf. Newidiad(au) Penodol: **FCM/SuV33/a**  
Focused Change(s) Ref.:

# Llanllwni SuV35

Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
 Deposit Revised Carmarthenshire Local Development Plan 2018-2033

Newidiadau Penodol / Focused Changes

Scale 1:2500



**FCM/SuV35/a**

## Allwedd / Key

- Terfynau Datblygu fel y'i diwygiwyd / Development Limits as amended
- Newidiad(au) Penodol / Focused Change(s)

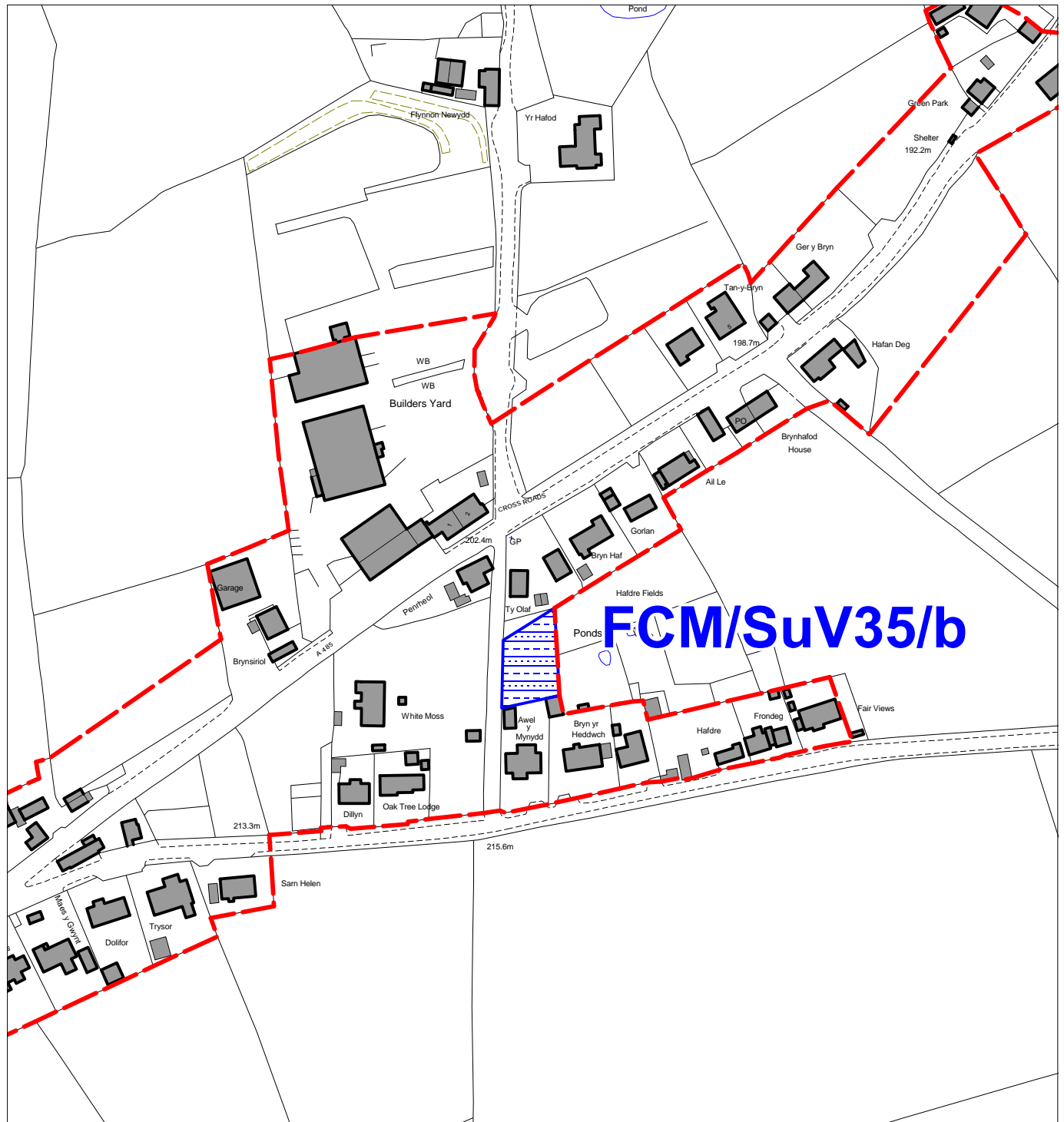
Cyf. Newidiad(au) Penodol: **FCM/SuV35/a**  
 Focused Change(s) Ref.:

# Llanllwni SuV35

Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
 Deposit Revised Carmarthenshire Local Development Plan 2018-2033

Newidiadau Penodol / Focused Changes

Scale 1:2500



## Allwedd / Key

- Terfynau Datblygu fel y'i diwygiwyd / Development Limits as amended
- Newidiad(au) Penodol / Focused Change(s)

Cyf. Newidiad(au) Penodol: **FCM/SuV35/b**  
 Focused Change(s) Ref.:

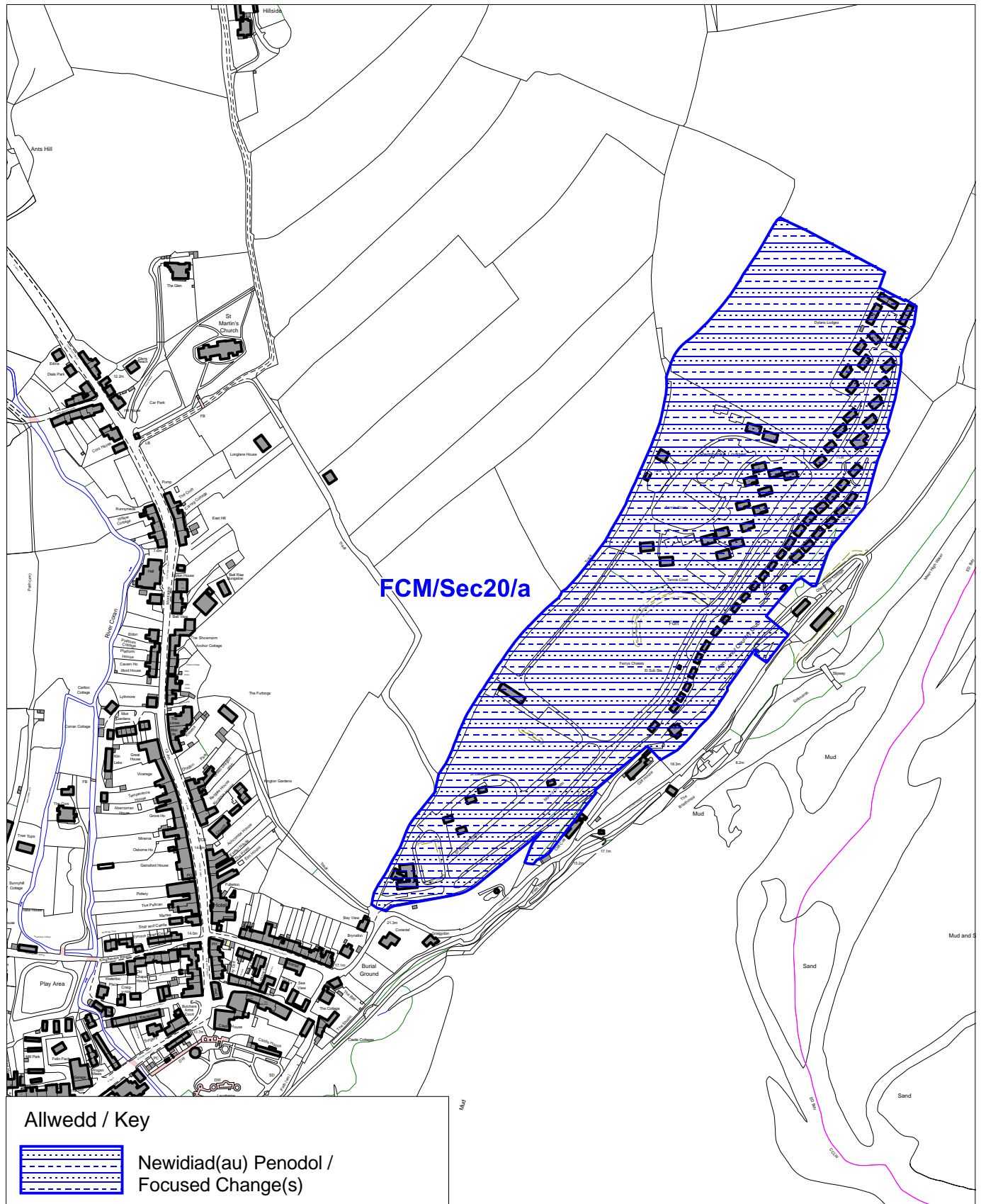
Change Ref	Settlement reference	Site Ref (where applicable)	Description of Change	Reason/Comment	Source	
					Representation	Council Change
<b>Cluster 6</b>						
FCM/Se C20/a	Laugharne		Identify the Laugharne Holiday Park as a mixed use site in conjunction with policy SG1.	To reflect the re-development on the site and in response to a representation.	<b>4127</b>	
FCM/SG /a	Llanfallteg area		Sand & Gravel – Area of Search to be identified on Proposals Map.	In response to a representation from a statutory consultee.	<b>3889, 3570</b>	
FCM/M S/a	NW of Glandy Cross		Part of Buffer Zone of Gilfach Quarry (in PCNPA) that extends marginally into Carmarthenshire to be identified on the Proposals Map.	In accordance with national policy.	<b>N/A</b>	

# Lacharn / Laugharne SeC20

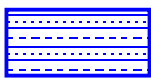
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Deposit Revised Carmarthenshire Local Development Plan 2018-2033

Newidiadau Penodol / Focused Changes

Scale 1:5000



### Allwedd / Key



Newidiad(au) Penodol /  
Focused Change(s)

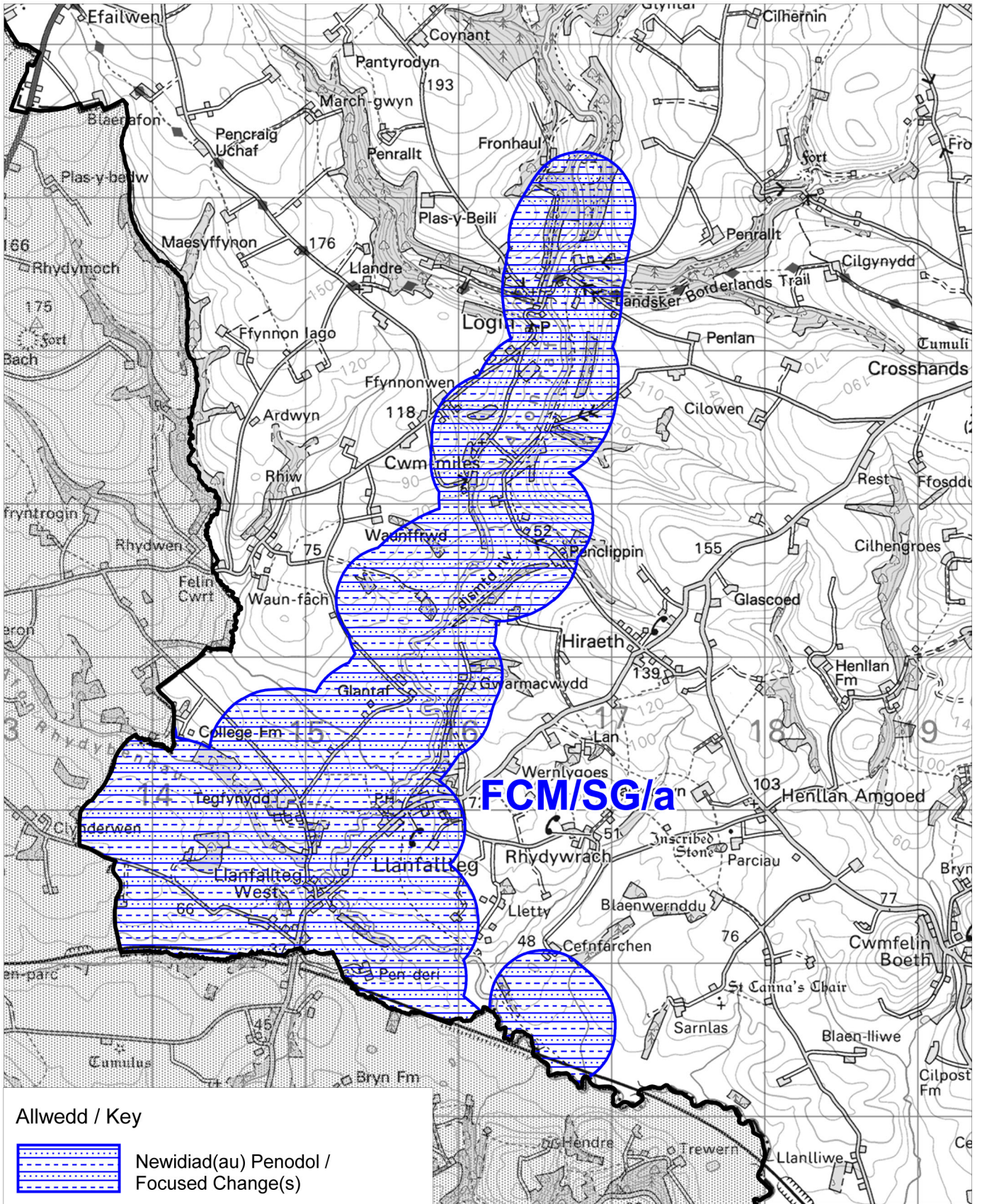
Cyf. Newidiad(au) Penodol: **FCM/Sec20/a**  
Focused Change(s) Ref.:

# Ardal Chwilio Tywod a Graean / Sand and Gravel Area of Search

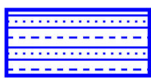
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Deposit Revised Carmarthenshire Local Development Plan 2018-2033

Newidiadau Penodol / Focused Changes

Scale 1:35000



Allwedd / Key



Newidiad(au) Penodol / Focused Change(s)

Cyf. Newidiad(au) Penodol: **FCM/SG/a**  
Focused Change(s) Ref.:



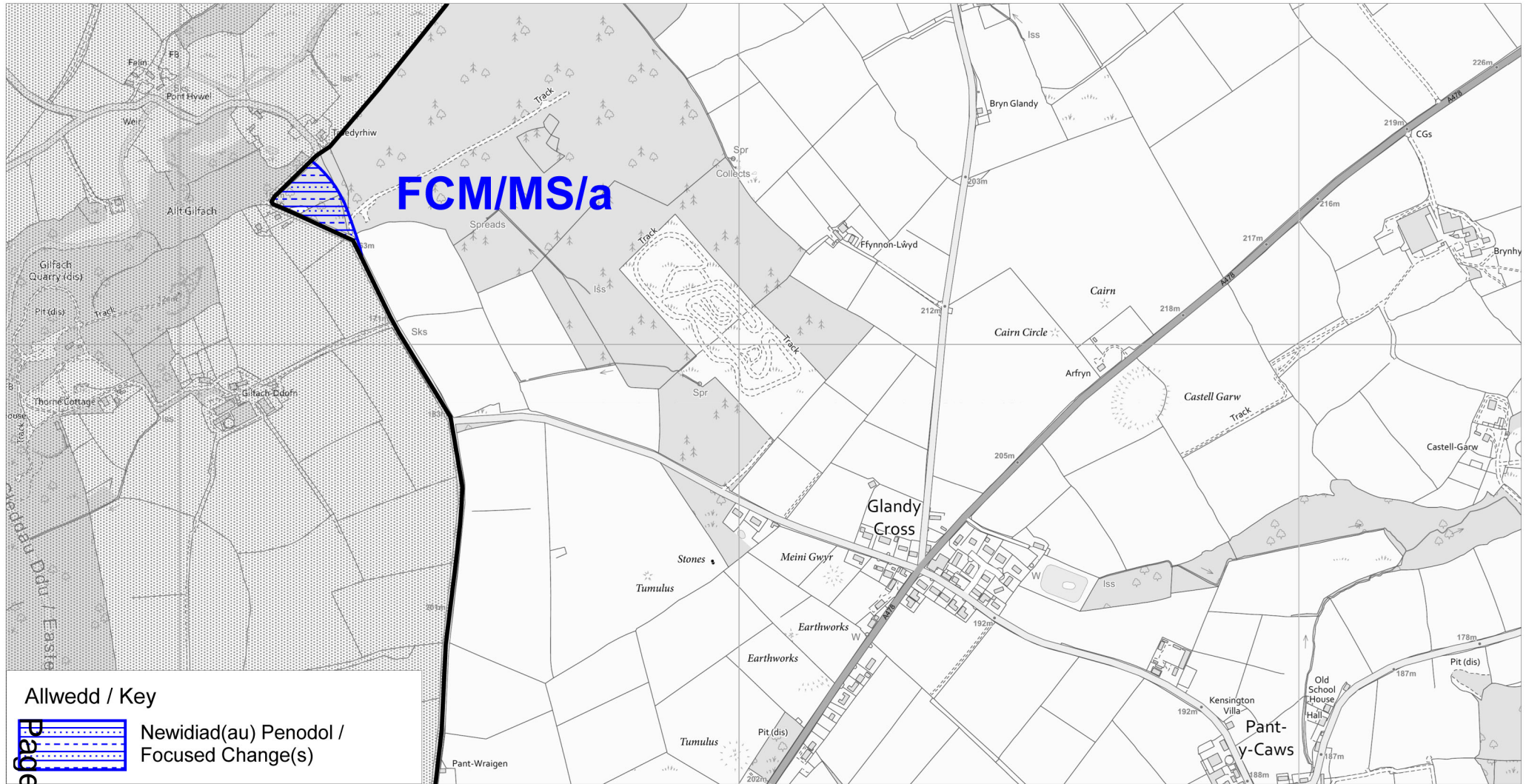
# Clustogfeydd Cysylltiedig Chwarel Gilfach / Gilfach Quarry Buffer Zone

Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
 Deposit Revised Carmarthenshire Local Development Plan 2018-2033  
 Newidiadau Penodol / Focused Changes




Scale 1:10000

Carmarthenshire County Council,  
 Environment Department,  
 3 Spilman Street, Carmarthen, SA31 1LE  
 Cyngor Sir Gaerfyrddin, Adran Yr Amgylch  
 3 Heol Spilman, Caerfyrddin, SA31 1LE



Allwedd / Key

 Newidiad(au) Penodol / Focused Change(s)

Ref. Newidiad(au) Penodol:  
 Focused Change(s) Ref.:

**FCM/MS/a**

Change Ref	Settlement reference	Site Ref (where applicable)	Description of Change	Reason/Comment	Source	
					Representation	Council Change
<b>Proposals Map</b>						
FCM/S/a	N/A	LSA – S2	Remove Local Search Area for Solar – S2	To reflect the findings in the Revised Renewable Energy Assessment.		✓
FCM/S/b	N/A	LSA – S1	Amend the boundary of the Local Search Area for Solar – S1.	To reflect the findings in the Revised Renewable Energy Assessment.		✓

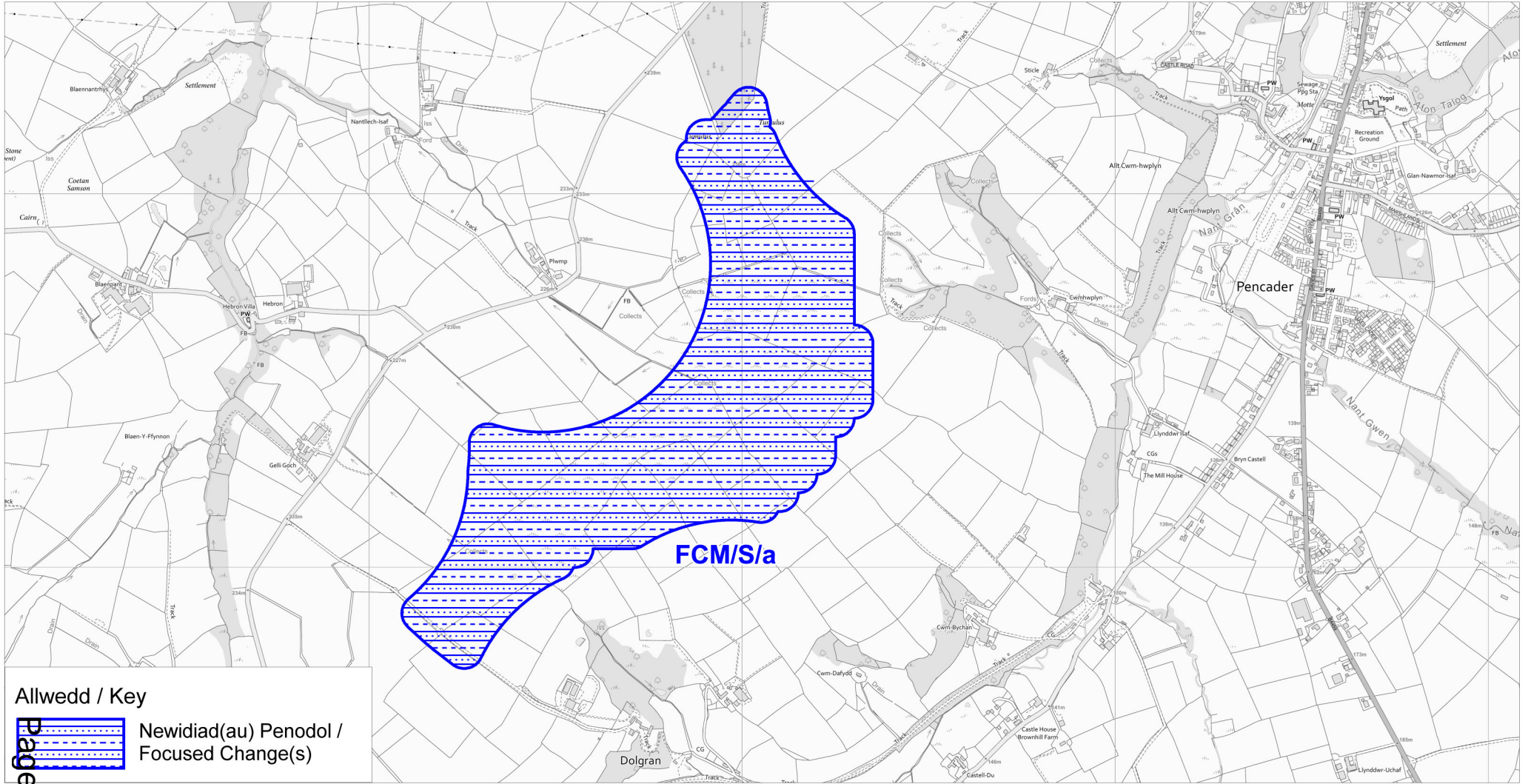
# ACL (Ardaloedd Chwilio Lleol) Solar / LSA (Local Search Area) Solar

Cynllun Datblygu Lleol Adneuo Diwygiedig Sir Gaerfyrddin 2018-2033  
Deposit Revised Carmarthenshire Local Development Plan 2018-2033  
Newidiadau Penodol / Focused Changes




Scale 1:15000

Carmarthenshire County Council,  
Environment Department,  
3 Spilman Street, Carmarthen, SA31 1LE  
Cyngor Sir Gaerfyrddin, Adran Yr Amgylchedd  
3 Heol Spilman, Caerfyrddin, SA31 1LE



Allwedd / Key

 Newidiad(au) Penodol / Focused Change(s)

Cyf. Newidiad(au) Penodol:  
Focused Change(s) Ref.:

**FCM/S/a**

# ACL (Ardaloedd Chwilio Lleol) Solar

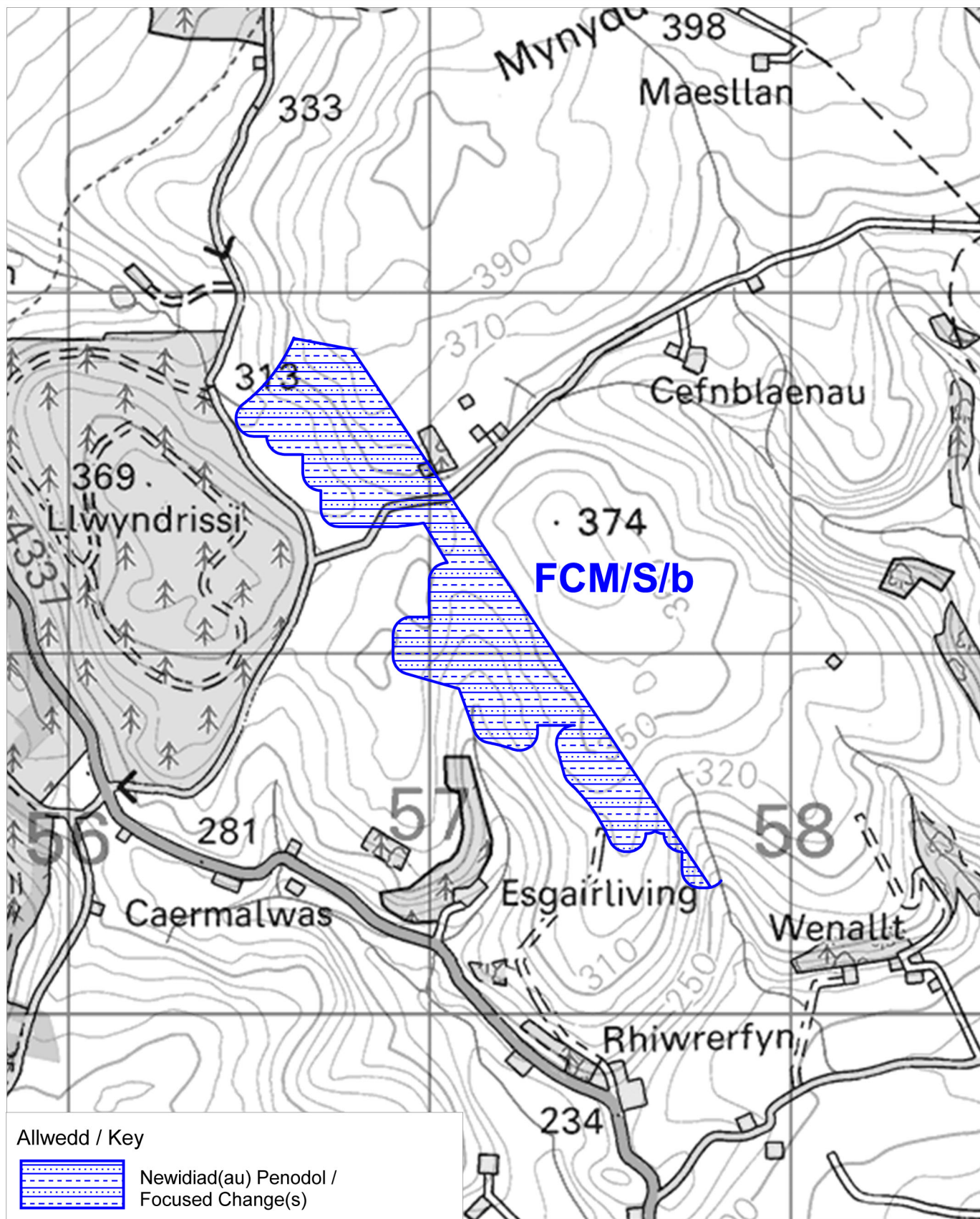
## LSA (Local Search Area) Solar

Cynllun Datblygu Lleol Adnewo Diwygiedig Sir Gaerfyrddin 2018-2033

Deposit Revised Carmarthenshire Local Development Plan 2018-2033

Newidiadau Penodol / Focused Changes

Scale 1:15000



Cyf. Newidiad(au) Penodol: **FCM/S/b**  
Focused Change(s) Ref.:

## **Appendix 10 – Revised Carmarthenshire LDP Preparatory Considerations**

Whilst the LDP plays a key role in shaping decision making and the location and nature of developments within the County, it is prepared and operated within the national framework set through legislation and by Planning Policy Wales and accompanying Technical Advice Notes. In this respect the Plan must have regard to National Planning Policy and legislation including the Well-being and Future Generations Act 2015, Planning (Wales) Act 2015 and the Environment (Wales) Act 2016.

The process for the preparation of the LDP is set within statutory regulations, with further procedural guidance contained within the LDP Manual as prepared by the Welsh Government. The preparation and content of the LDP at the Examination in Public will be assessed against three tests of soundness set out in national policy, namely:

1. Does the plan fit?
2. Is the plan appropriate?
3. Will the plan deliver?

Failure of the Revised LDP to comply with the 3 tests of soundness will result in it not being adopted. The full content of the tests of soundness are set out below.

It should also be noted that the Inspector's findings following the Examination are binding on the Authority.

Due regard will also need to be had to the emerging Future Wales: the National Plan 2040 for Wales and the requirements for LDPs to conform to its content.

### **Submission Documents**

In accordance with LDP Regulation 22 the Council must publicise and advertise the submission and both publish and make available the relevant documentation. It must send simultaneously to the Planning Inspectorate and the Welsh Government (Planning Directorate) paper copies and an electronic copy of the following documents.

- the Deposit LDP
- the Addendum: schedule of Focussed Changes (FCs)
- the SA report
- the Review Report
- the Candidate Sites Register (where applicable)
- all other supporting evidence-base material and technical documents such as the HRA and issue/topic-based evidence/technical documents
- the DA incorporating the CIS
- the Consultation Report (which should update and expand upon the initial consultation report, see previous section)
- Statements of Common Ground (SoCG)
- A copy of all representations made to the deposit plan and FCs where relevant (required only for Planning Inspectorate)

## Tests of Soundness

### Preparation Requirements:

- Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, CIS, SEA Regulations, SA, HRA etc.?)
- Is the plan in general conformity with the NDF and/or SDP? (when published or adopted respectively)

### Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

#### Questions

- Does it have regard to national policy (PPW) and the WSP (NDF when published)?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the LPA demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

### Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?) Questions

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

**Test 3: Will the plan deliver?** (Is it likely to be effective?)

Questions • Will it be effective?

- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

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## EXECUTIVE BOARD

21 DECEMBER 2020

### REGIONAL TECHNICAL STATEMENT FOR AGGREGATES – SOUTH WALES – SECOND REVIEW (RTS2)

**Recommendations / key decisions required:**

That the Executive Board formally endorse the Regional Technical Statement for Aggregates – South Wales – Second Review (RTS2)

**Reasons:**

The RTS2 provides a reasonable approach to setting out the apportionments and allocations required to ensure an adequate supply of minerals in South Wales over a 25-year period.

Relevant scrutiny committee to be consulted No

Exec. Board Decision Required	YES 21 <sup>st</sup> December 2020
Council Decision Required	YES 13 <sup>th</sup> January 2021

**EXECUTIVE BOARD MEMBER PORTFOLIO HOLDER:-** Cllr. Mair Stephens

Directorate: Environment Name of Head of Service: Llinos Quelch Report Author: Hugh Towns	Designations: Head of Planning  Regional Minerals & Waste Planning Manager	Tel: 01267 228918  01558 825373 Email addresses: <a href="mailto:LQuelch@sirgar.gov.uk">LQuelch@sirgar.gov.uk</a> <a href="mailto:AHTowns@sirgar.gov.uk">AHTowns@sirgar.gov.uk</a>
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# EXECUTIVE SUMMARY EXECUTIVE BOARD

21 DECEMBER 2020

## REGIONAL TECHNICAL STATEMENT FOR AGGREGATES – SOUTH WALES – SECOND REVIEW

### Background

The Regional Technical Statement (RTS) is a requirement of Minerals Technical Advice Note 1: Aggregates (MTAN1). It requires both the South Wales and North Wales Regional Aggregates Working Parties to produce a RTS and for it to be reviewed every 5 years. The initial document was produced in 2008 and was reviewed in 2014. A second review was due in 2019 but its completion has been delayed.

The South Wales Aggregates Working Party, for which this Authority provides the Chair and the Technical Secretary, is a technical group consisting of officers from the 18 constituent Local Planning Authorities in South Wales, Natural Resources Wales, Welsh Government, and representatives of the minerals industry.

The Regional Technical Statement: Second Review (RTS2) has been produced by a consultant under contract to Welsh Government. However, the project was managed by a Steering Group containing officers from Welsh Government, Local Planning Authorities, Natural Resources Wales, and representatives of the minerals industry drawn from the South Wales and North Wales Regional Aggregates Working Parties. The Authority was represented on the Steering Group.

The purpose of the RTS2 is to provide a strategy for the future supply of construction aggregates within each region (North and South Wales) taking into account the latest information in relation to the balance of supply and demand and current notions of sustainability as enshrined in the Wellbeing of Future Generations (Wales) Act 2015. It provides a mechanism for encouraging the sustainable management of natural resources within a region for a 25-year period for crushed rock and 22 years for land-won sand and gravel. The document also considers the impact of the proximity principle, environmental capacity and a number of other supply and demand factors.

A draft RTS2 was issued for consultation between 30th September to 25th November 2019. The Authority responded to the consultation raising a number of concerns. The Steering Group considered all the consultation responses and produced a Consultation Report setting out their response to consultation. The RTS2 has subsequently been finalised and each Authority is being requested to endorse it.

## Methodology

The starting point is the calculation of the 3-year and 10-year historical annual sales average for each Local Planning Authority (LPA) area and selecting the highest of the two figures so as to avoid potential under-provision of mineral resources required for economic growth in the future.

The 1<sup>st</sup> stage of the methodology is based around the high statistical correlation between housing completions and aggregate sales. Both markets have been identified as being very closely aligned even though housing consumes only 30% of supply. As planned housing within adopted Local Development Plans (LDP's) was double the historical average housing completions it is proposed to double the 30% supplied for house construction. A number of LPA's (including Carmarthenshire) queried this on the basis that up to date housing figures produced in the National Development Framework (NDF) consultation draft, and lower than planned actual housing completion figures, suggested that the 30% 'uplift' is not required. The Steering Group considered the position but was unable to identify another set of consistent data to use as a baseline. It was therefore considered by the Steering Group that LDP data was the only dataset the RTS2 could realistically use. The conclusion of the Steering Group is understood and accepted.

Stage 2 of the process splits the national figure into figures for North Wales (38.26%) and South Wales (61.74%) based on the average proportional split over the base line period.

Stage 3 splits the Regional requirements down to sub-regions and individual LPA's. The split to sub-regions was supported by the Authority in its consultation response but drilling down another level to individual LPA's was not supported as it is not the option that provides for the most Sustainable Management of Natural Resources. However, the steering group had to accept that a figure for each LPA is a requirement of PPW10. It is accepted that the provision of Sub-regional figures and the requirement to produce a Statement of Sub-regional collaboration (discussed further below) do provide an acceptable framework to plan for minerals at a more strategic level in future.

Stage 4 splits the apportionments between crushed rock and land-won sand and gravel based on the proportion of historic sales. Only Ceredigion, Carmarthenshire and Pembrokeshire Coast National Park have land-won reserves of sand and gravel and together with Pembrokeshire RTS2 requires (as did RTS1) that they work together to identify future resources of 3.626 million tonnes. It is important to note that Carmarthenshire is not required to make any allocations for crushed rock quarries in the LDP review.

## Next Steps

A Sub-Regional Statement of Collaboration (SSRC) is required to be produced in each sub-region and Carmarthenshire will be required to work with the West Wales LPA's in relation to land-won sand and gravel and with 'Swansea City' (Swansea and Neath Port Talbot) in relation to crushed rock. This split is due to the differences in the nature and location of resources within Carmarthenshire.

The RTS2 Consultation draft suggested that the SSRC should be approved by the Regional Aggregate Working Party (RAWP) but the Authority pointed out in its consultation response that this is outside the remit of a RAWP. This has now been deleted from RTS2. SSRC's will now only have to be approved by the constituent LPA's following consultation with stakeholders.

The Authority also considered that SSRC's should be provided with a set timeframe so that the whole of Wales is working on them simultaneously and consistently. However, it is accepted that some LPA's are further ahead on LDP Review than others so the requirement that each SSRC is agreed prior to the first LPA within a sub-region attending its LDP Examination is accepted. The SSRCs can be signed off according to the Council's delegation protocols and does not need to go back the Council for endorsement.

The timetable for the Carmarthenshire Replacement LDP is that it will be Reported to the Exec. Board on 21<sup>st</sup> December 2020 – setting out the focussed changes, report on consultation and the Deposit Plan - and be reported to Full Council on Council 13<sup>th</sup> January 2021. If the Replacement LDP is agreed by Council in January 2021 it is envisaged that the Plan will be submitted to Welsh Government in May 2021.

## Conclusion and Recommendations

The RTS2 has been fully consulted upon and the responses fully considered by the Steering Group.

**It is recommended that the Executive Board formally endorse the Regional Technical Statement for Aggregates – South Wales – Second Review (RTS2)**

DETAILED REPORT ATTACHED?

YES

## IMPLICATIONS

I confirm that other than those implications which have been agreed with the appropriate Directors / Heads of Service and are referred to in detail below, there are no other implications associated with this report:

Signed: L Quelch

Head of Planning

Policy, Crime & Disorder and Equalities	Legal	Finance	ICT	Risk Management Issues	Staffing Implications	Physical Assets
<b>YES</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>

### Policy, Crime & Disorder and Equalities

- RTS2 is the output of collaborative working between Local Planning Authorities, Welsh Government, and the minerals industry. The document has been consulted upon in order to seek to involve people with an interest. The document considers the strategic importance of minerals and seeks to plan for minerals supply over a 25-year period for crushed rock and 22 years for sand and gravel in order to prevent the under-provision of minerals that the economy needs to underpin growth. It is therefore considered to be a good example of following the 5 ways of working enshrined in the Well-being of Future Generations Act 2015.
- RTS2 contributes to the Sustainable Management of Natural Resources as required under the Environment (Wales) Act 2016.
- The RTS2 provides part of the evidence base for the Replacement LDP and the Council will be expected to integrate the strategic objectives into the LDP. The adequate supply of minerals the construction industry needs to support economic growth in Carmarthenshire is a key element which underpins the Councils well-being objective of creating more jobs and growth throughout the county.

## CONSULTATIONS

I confirm that the appropriate consultations have taken in place and the outcomes are as detailed below

Signed: L Quelch

Head of Planning

- 1. Scrutiny Committee - N/A
- 2. Local Member(s) - N/A
- 3. Community / Town Council - N/A
- 4. Relevant Partners - N/A
- 5. Staff Side Representatives and other Organisations - N/A

**EXECUTIVE BOARD PORTFOLIO  
HOLDER AWARE/CONSULTED**

**YES  
Councillor M. Stephens**

**Section 100D Local Government Act, 1972 – Access to Information  
List of Background Papers used in the preparation of this report:**

Title of Document	Locations that the papers are available for public inspection
Regional Technical Statements for the North Wales and South Wales Regional Aggregate Working Parties - 2nd Review - Report on Consultation Responses With Steering Group Recommendations	The South Wales Regional Aggregates Working Party Website - <a href="http://www.swrawp-wales.org.uk/Html/publications.html">http://www.swrawp-wales.org.uk/Html/publications.html</a>
Regional Technical Statement for the North Wales and South Wales Regional Aggregates Working Party (1 <sup>st</sup> Review)	The South Wales Regional Aggregates Working Party Website - <a href="http://www.swrawp-wales.org.uk/Html/publications.html">http://www.swrawp-wales.org.uk/Html/publications.html</a>
Regional Technical Statement for the area covered by the South Wales Aggregates Working Party – October 2008	The South Wales Regional Aggregates Working Party Website - <a href="http://www.swrawp-wales.org.uk/Html/publications.html">http://www.swrawp-wales.org.uk/Html/publications.html</a>

# **REGIONAL TECHNICAL STATEMENT FOR THE NORTH WALES AND SOUTH WALES REGIONAL AGGREGATES WORKING PARTIES – 2<sup>ND</sup> REVIEW (RTS2) - (SEPTEMBER 2020)**

## **Introduction**

Minerals Technical Advice Note 1: Aggregates – March 2004 (MTAN1) requires the preparation of Regional Technical Statements (RTS) for the areas covered by the North Wales and South Wales Aggregates Working Parties and for these to be reviewed every 5 years. The Initial RTS was produced in 2008 and the RTS: 1<sup>st</sup> Review (RTS1) was published in 2014. It therefore fell to be reviewed again in 2019.

A Consultation Draft of RTS2 was published in August 2019. The Council submitted a response. Responses were considered by the Steering Group and the final version of RTS2 was issued in September 2020. A copy of RTS2 is attached as Appendix 1.

The Authority is requested to formally endorse the document before it is endorsed by Welsh Government as an outcome of collaborative working.

## **The Purpose and Objectives of the RTS**

The purpose of the RTS is to provide a strategy for the future supply of construction aggregates within each Region, taking account of the latest available information regarding the balance of supply and demand, and current notions of sustainability as enshrined in the Wellbeing of Future Generations (Wales) Act 2015. The overarching objective being to ensure the Sustainable Management of Natural Resources. This means that supply is managed in a sustainable way so that the best balance between environmental, economic, social and cultural considerations is struck, while making sure that the environmental and amenity impacts of any necessary extraction are kept to a level that avoids causing demonstrable harm to interests of acknowledged importance.

The RTS provides a mechanism for encouraging national sustainability objectives to be met by individual planning authorities within each region for a period of 25 years (crushed rock) and 22 years (sand and gravel). This reflects the periods required in order to comply with the requirements set out in Planning Policy Wales: Edition 10 (PPW10) to have at least 10 years supply of crushed rock and 7 years supply of sand and gravel over the entire period of the development plan. This process is referred to as **apportionment**.

Where there is an identified shortfall of supply then Local Planning Authority's (LPA's) will be expected to make **allocations** for new sites or extensions to existing sites within their development plans unless new evidence becomes available which suggests that Local Planning Authorities would be justified in departing from the allocations without undermining the overall strategy provided in the RTS.

## **Key Principles and Approach**

A key principle which underpins the approach taken by RTS1 and RTS2 is the need to move away from the old demand-led system of 'Predict and Provide' to the more modern concept of 'Plan, Monitor and Manage'. An assessment of demand will still be required but once a reasonable estimate has been obtained it is also necessary to consider the contribution that can be made from secondary and recycled sources and also to incorporate two key principles of sustainability: the proximity principle and the notion of environmental capacity.

The **Proximity Principle** relates simply to the objective of minimising unnecessary transportation of construction aggregate, particularly by road, by ensuring that sources of supply are located as close as possible to the main centres of demand. The original RTS aimed to accomplish this by providing 'per capita' apportionments for future aggregate provision as a proxy for demand. It was however established during the RTS1 review that a major drawback of this approach was that there is no statistical correlation between population and demand for aggregate. Therefore, RTS1 considered variations in population density instead of the 'per capita' approach together with a range of other influences including access routes and transport distances. The main criticism of that approach is that it relied primarily on historical sales figures as indicators of demand, which inevitably perpetuated the historical pattern of supply and gave very limited scope to change this pattern over time to achieve improvements in sustainability. The RTS2 review has therefore sought to introduce housing completion data and future housing provision forecasts as part of the overall assessment of demand.

It also needs to be recognised that certain types of high specification aggregate (HSA), e.g. the Pennant Sandstone outcrop in South East Wales, serve quite different markets (high skid resistance material for roads) and therefore require distribution throughout England and Wales as that type of material is scarce in the UK context. The proximity principle needs to be modified in such cases.

The notion of **environmental capacity** is a more controversial issue. The basic principle is that quarrying should be focussed on areas which have the greatest capacity to absorb the environmental impacts associated with quarrying activity. However, there is a lack of consensus in terms of how environmental capacity should be defined, and from the way in which the concept has influenced the allocation targets within the previous RTS documents.

Two previous research projects - Establishing a Methodology for Assessing Aggregate Demand and Supply (EMAADS 2004) and Implementing the Methodology for Assessing the Environmental Capacity for Primary Aggregates (IMAECA 2005) resulted in a traffic light system for areas of Wales where potential resource existed and coloured each km square red, amber or green to reflect relatively low, relatively neutral or relatively high environmental capacity respectively. One of the difficulties



with this approach was that the existence of a quarry within a km square instantly turned the square 'red' indicating relatively low environmental capacity. This suggested that it would be better in environmental terms to start up a new quarry in an area coloured 'green' than to look at extending an existing quarry in an area coloured 'red'. However, extensions to existing quarries are often preferable to establishing new quarries on Greenfield sites so there were clear limitations to this research even at the strategic RTS level at which it was intended to be used.

When considering issues such as environmental capacity the joint consideration by LPA's of the relationship between mineral resources and environmental designations on a sub-regional basis would potentially allow more detailed consideration to be given to identifying the most sustainable locations for mineral development at an appropriate spatial scale which extends beyond the administrative boundaries of an individual local planning authority.

### **Analysis of Existing Supply Patterns**

As well as balancing supply and demand, consideration must also be given to the adequacy or otherwise of the existing pattern of supply from a sustainability perspective.

As stated above, the original RTS only considered proximity in terms of a 'per capita' demand analysis and the concept of environmental capacity was considered only in terms of providing qualitative descriptions for each LPA from the IMAECA analysis.

In the RTS1 review, a determined attempt was made to use the proximity principle, and environmental capacity to better effect, in conjunction with an understanding of resource availability and historical supply patterns, in order to enhance, if possible, the spatial distribution of future supply sources.

The distribution of suitable geological resources is of fundamental importance in understanding the distribution of existing quarries and in understanding the limitations involved in locating potential new ones. The starting point for this is the Minerals Resource Map of Wales published by British Geological Survey (BGS) as clearly minerals can only be worked where they are found and are commercially viable to extract.

Typically most general aggregate has an economic radius of distribution of up to 50km. However, RTS1 and RTS2 demonstrate that the vast majority of Wales is located within 20km of a source of aggregate located within one of the identified resource blocks. In these terms alone it would suggest that there is no great problem with the existing pattern of supply and that significant change is not necessary.

However, more careful consideration is needed in future to ensure that minerals development is guided to the most suitable locations irrespective of the historical supply pattern. This would suggest that planning for minerals should be carried out

at a more strategic level i.e. sub-regional areas based on market areas rather than at individual LPA level.

### **Changing the Pattern of Supply**

Minerals Technical Advice Note 1: Aggregates (MTAN1) suggests that the existing pattern of supply is largely a historical residual and will need to gradually change to reflect current notions of sustainability. However, the RTS1 review found that the historical patterns of supply have much to commend them: they reflect the spatial distribution of available resources and the economic imperative of industry to establish quarries as close as possible to areas of demand. Quarries which have become uneconomic have naturally fallen into disuse and those which remain are generally well placed to serve current markets. However, where there is conflict with environmental designations it may not be appropriate to use historical supply as a proxy for future supply.

The implementation of the proximity principle and the notion of environmental capacity may gradually induce changes to the overall pattern of supply if alternatives have clear advantages in terms of sustainability but in any event this change will not be immediate as existing sites will continue to work until they run out of reserve or become uneconomic to work.

The RTS can help to influence the process where it is deemed to be desirable by adjusting the apportionments given to individual Planning Authorities.

### **Methodology for RTS 2<sup>nd</sup> Review**

The starting point in each RTS for the apportionment of future aggregates provision has been to make an assessment of likely future demand. The methodology in RTS1 was primarily based on historical sales averages for each local planning authority over the 10 year period 2001-2010, combined with a limited assessment of various 'drivers' of potential future change.

The RTS2 review has taken the historical sales for each local planning authority averaged over a 3 year (2014-2016) and a 10 year period (2007-2016) and selected the highest of these figures so as to avoid potential under-provision in some areas. This has resulted in an identified national requirement (based on these historical sales) of 15.557 million tonnes of aggregate per annum (down from 17.69 million tonnes in RTS1 due to the economic recession). It is important to note that this is the residual demand requirement as it has been assumed that marine, secondary and recycled aggregate will continue to be provided at similar rates to previously.

However, the RTS2 methodology has made a deliberate attempt to reflect planned future requirements for housing construction as identified in each of the Local Development Plans (LDP's). The reason for this is that there is a very high statistical correlation between housing completions and aggregate sales at a national level, even though it is accepted that housing only makes up 30% of overall aggregate

use. There is no such statistical correlation between other construction activity and aggregate sales. This is not to say that housing completions are a predictor of demand, merely the trends in both markets are reflective of each other.

Stage 1 of the RTS2 review identified that planned annualised housing provision in Local Development Plans across Wales was more than double the average annual housing completions between 2007-2016. On the basis that the historic housing completions had sustained 30% of aggregate supply over the past 10 years then it is logical to assume that if the planned housing was set to double then the 30% element of aggregate demand associated with it should also be doubled. This is not to say that housing completions will double, but if housing is planned to double then aggregate provision must be made for that planned level of demand.

The RTS2 therefore proposes to add 30% to the historical sales average at the national level which increases the identified national requirement to 20.224 million tonnes per annum. There was a clear inescapable logic to this approach as the housing provision in LDP's has been tested at Examination and found to be sound.

However, the population forecasts on which LDP's housing requirements were based have been found to be too high and the Draft National Development Framework (NDF) issued for consultation by Welsh Government estimates a national housing requirement of 5,700 additional homes per annum up to 2038. This is less than the average annual completions (2007-2016) of 6,424. This would suggest that although the methodology is sound, there is information now available which would suggest that the 30% uplift is no longer necessary. In its response to consultation the Council suggested that the methodology needed to be revisited. The Steering Group did consider the issue in detail but was unable to identify another source of consistent data on which to base an assessment. As it is critical that there is a consistent dataset on which to base an assessment it is accepted that the LDP has to be used.

Stage 2 of the review assessed the appropriate split of the national requirement between North and South Wales. The average split over the baseline period was 38.26% for North Wales and 61.74% for South Wales and these proportions were applied to the 20.224 national requirement. The result is an annual requirement for North Wales of 7.738 million tonnes and for South Wales of 12.486 million tonnes.

Stage 3 of the review seeks to sub-divide the regional figures between identified sub-regions and to individual LPAs. In South Wales there are 5 sub-regions based on market areas. These are identified as **Powys**, **'West Wales'** (Pembrokeshire, Pembrokeshire Coast National Park and Ceredigion), **'Swansea City'** (Swansea, Neath Port Talbot and Carmarthenshire), **'Cardiff City'** (Cardiff, Rhondda Cynon Taf, Merthyr, Caerphilly, Bridgend, Vale of Glamorgan and Brecon Beacons National Park) and **'former Gwent'** (Blaenau Gwent, Torfaen, Newport and Monmouthshire).

The methodology for undertaking the sub-division of the regional requirement to the sub-regions is based on a combination of quantitative calculations and qualitative judgements.

The quantitative calculations for annualised apportionments for each LPA are based on two 'theoretical' sets of figures –

- Option A, in proportions which are based solely on the highest of the 3-year or 10-year average historic annual sales and
- Option B, in proportions which reflect the annualised housing completion data for each LPA expressed as a percentage of the sub-regional housing requirement totals (for this purpose 'Cardiff City' and 'former Gwent' were combined).

Option A has the advantage of reflecting the existing distribution of supply sources and is therefore realistic in terms of deliverability. However, it has the disadvantage of perpetuating historical supply patterns and the potential inequalities contained therein. It represents the preferred option in areas where the historical supply pattern appears to provide a sensible balance between the availability of resources and the location of demand but requires modification elsewhere.

Option B theoretically provides a way of changing the pattern of supply to one that is more equitable in terms of proximity and the use of resources. However, it takes no account of the spatial pattern of geological resources or existing quarries. Therefore, on its own this would be wholly inappropriate as a future supply strategy as it would not be deliverable within the timescales required. It does however give a useful indication of the required direction of travel that may be needed in order to improve existing patterns of supply from a sustainability perspective.

In practice, where the supply pattern was considered to be in need of adjustment, qualitative judgement has been applied and the two sets of figures were averaged to produce a preferred option which reflected the need for gradual change but also had an element of deliverability. This approach is supported at a sub-regional level.

However, the same methodology is applied in order to generate individual apportionments to each LPA. The basis for this seems to be that Paragraph 5.14.10 of Planning Policy Wales: Edition 10 (PPW10) states that:

*Each mineral planning authority should ensure that it makes an appropriate contribution to meeting local, regional and UK needs for primary minerals which reflects the nature and extent of resources in the area and their best and most appropriate use, subject to relevant environmental and other planning considerations.*

However, Paragraph 5.14.16 also states that:

*Planning authority boundaries may form a suitable area basis on which to base a land-bank policy, however for some authorities the administrative area may be too small, the environmental constraints too important, or the availability of a workable resource too limited to enable an individual land-bank policy to be applied. In these circumstances, authorities must agree a joint approach with neighbouring authorities in line with current regional arrangements and may require liaison with relevant mineral planning authorities in England.*

It is a long established view that 'minerals' are an important natural resource and that by its very nature mineral planning is or should be 'strategic'. It also follows from Paragraph 5.14.16 of PPW10 that it is acknowledged that planning for minerals at an LPA level may not be possible, especially in South Wales because many LPA's are just too small or do not have the natural resources.

In the Councils response to the consultation it considered the RTS2 to be an opportunity to plan sustainably and strategically over sub-regional areas rather than the outdated concept of managing the supply of minerals at an LPA level. However, the Steering Group had to accept that PPW10 requires each LPA to be provided with an apportionment in order to 'make an appropriate contribution'. The sub-regional figures and the Statements of Sub-regional collaboration provide a mechanism for sub-regions to work together.

The Statements of Sub-Regional of Collaboration are a new requirement of RTS2 and are required to be agreed by each of the LPA's within a sub-region. There was a requirement in the consultation draft and for this to be approved by the RAWP prior to the Examination of any LDP within that sub-regional area. The Council pointed out in its consultation response that the SRAWP is a technical group and has no remit in approving such documents. This has been accepted by the Steering Group.

The purpose of the Sub-Regional Statement of Collaboration is to allow the constituent LPA's to depart from their specific allocation provided the overall sub-regional apportionment is met elsewhere within the sub-region.

The idea of a Sub-Regional Statement of Collaboration has been supported in principle but the Council considered that there should be a set timescale for them so that they were all being done at the same time. However, the Steering Group considered that as all LDP's are not on the same timescale it would be difficult for some LPA's. Therefore, the SSRC will be required before the first LPA in a sub-region has its LDP examination. This is an acceptable position.

### **Swansea City Sub-region**

The preferred annualised apportionment for the 'Swansea City' sub-region is currently shown in the draft as 1.716 million tonnes per annum, of which 1.105 million tonnes per annum is shown as coming from Carmarthenshire and 0.305 million tonnes per annum coming from Swansea and Neath Port Talbot respectively.

The 1.105 million tonnes per annum for Carmarthenshire essentially equates to its percentage share of regional sales. There is little prospect of changing the supply pattern within the sub-region as Carmarthenshire is the only producer of limestone and the only 'alternatives' within the sub-region are within the Gower Area of Outstanding Natural Beauty. On that basis, Carmarthenshire would need 27.566 million tonnes up until 2041 and has permitted reserves at active/inactive sites of 59.9 million tonnes with a further 13.82 million tonnes at dormant sites. No allocations for crushed rock are therefore required in Carmarthenshire in the current LDP Review.

There are high specification aggregate sandstone reserves within Neath Port Talbot at two sites with planning permission (16.48 million tonnes) but no reserves within Swansea, although some resources exist in the northern part of the County. The RTS2 seeks to re-allocate some of the 'demand' on Neath Port Talbot's sites to hitherto unknown sites in Swansea although there is no clear need to do so.

The requirement for Neath Port Talbot is reduced by 50% of the historical sales to 7.636 million tonnes and Swansea is allocated the other 7.636 million tonnes even though the full amount (15.272 million tonnes) can already be provided from Neath Port Talbot's existing sites up until 2041. These changes in apportionment will need to be reviewed in the Statement of Sub-regional Collaboration.

Stage 4 of the review sub-divides the apportionment by aggregate type (crushed rock or land-won sand and gravel) based on the historical average sales split for that LPA. The annualised figure is then multiplied by 25 years for crushed rock and 22 years for land-won sand and gravel to arrive at the apportionment figure. The vast majority of LPA's do not have any land-won sand and gravel production so their allocations are purely crushed rock. However, Ceredigion, Pembrokeshire Coast National Park and Carmarthenshire have some sites and some identified resources on the Mineral Resources Map of Wales. It is therefore recommended in RTS2 that these LPA's, together with Pembrokeshire, work collaboratively in respect of future provision and seek to move sand and gravel provision outside of the National Park if possible. Allocations of a minimum of 3.626 million tonnes are required across these LPA's in the period up to 2038.

Carmarthenshire would therefore join with the 'West Wales' LPA's for the Sub-Regional Statement of Collaboration for sand and gravel but would remain with 'Swansea City' (Swansea and Neath Port Talbot) for crushed rock. This is a sensible approach given the location and market areas of the resources concerned.

### **Conclusion and Recommendations**

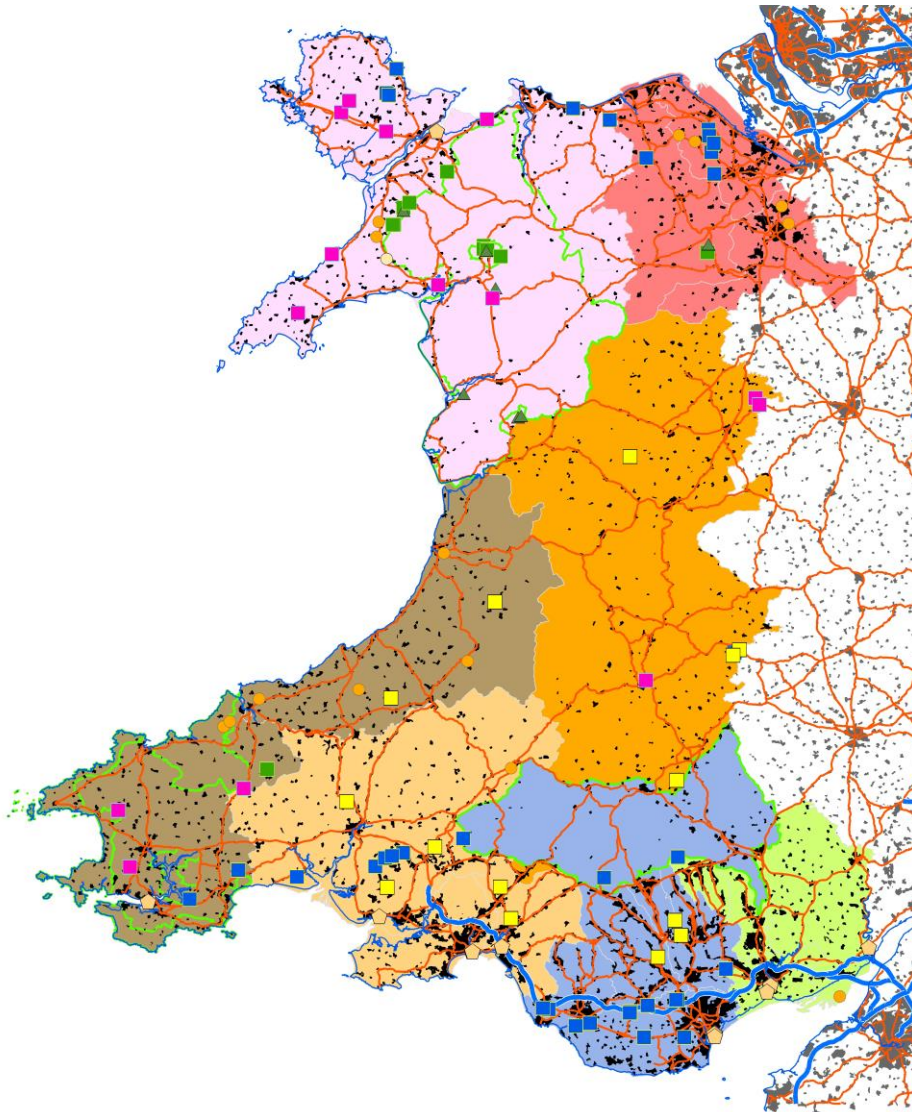
The Councils Consultation response has been adequately considered by the Steering Group and therefore it is recommended that the Executive Board formally endorse the RTS2.

# Regional Technical Statements

for the North Wales and South Wales

Regional Aggregate Working Parties

**- 2<sup>nd</sup> Review -**  
(Main Document)



*Final - September 2020*

North Wales  
Regional  
Aggregates  
Working Party



Llywodraeth Cymru  
Welsh Government

South Wales  
Regional  
Aggregates  
Working Party

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Prepared, on behalf of the Welsh Government and the North Wales and South Wales Regional Aggregate Working Parties

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## Foreword

Since the original Regional Technical Statements (RTS) were issued in October 2008, forward planning for minerals has formed an intrinsic part of the Local Development Plan (LDP) process. The LDPs have benefited from the clear direction the RTS has provided on the sustainable approach to mineral development in Wales. There is almost full LDP coverage and all have embraced the principal objectives of the RTS to provide adequate reserves of aggregate for the construction and other industries in the most sustainable manner reasonably achievable.

It is particularly satisfying to see certain elements of the RTS, such as the safeguarding of mineral resources, now enshrined in development plans to ensure such resources are protected for future generations. More importantly, new allocations, defined areas of search and preferred areas have also been incorporated into some LDPs.

As was the case with the First Review of the RTS, this Second Review has been prepared, on behalf of the North Wales and South Wales RAWPs, by Cuesta Consulting Ltd., with advice and peer review from a Steering Group which included representatives from both Regional Aggregate Working Parties (RAWPs), the Mineral Products Association and industry, Natural Resources Wales, officers from local government and the Welsh Government. The Steering Group provided vital technical information, updating and refining that given in previously published RAWP reports and in the original Regional Technical Statements. The Steering Group also provided or confirmed expert judgement, where this was called for in situations where precise factual detail was not available, and has provided a consensus endorsement of the various recommendations.

The Second Review RTS covers the 25 year period up to 2041, but further reviews will still be initiated every 5 years, in accordance with MTAN1, to ensure that the RTS can react to any significant change in circumstances. This will ensure that any major changes to supply and demand can be addressed and the RTS changed or modified as appropriate. This process underpins the plan, monitor and manage approach to aggregate planning in the UK. The new edition will continue to be considered as a strategic document for the purposes of Development Plan preparation and may be a material consideration when determining planning applications. We remain confident that all authorities will continue to embrace and implement the recommendations of the revised RTS in their development plans on a voluntary basis, and that Welsh Government (WG) will not need to have recourse to its powers of direction.

We would like to take this opportunity to gratefully acknowledge the considerable amount of work that has been undertaken to complete the Second Review, which includes the significant efforts of the RTS steering group and the diligent work of the consultant appointed to undertake and complete the work on schedule on behalf of the Welsh Government, and the participation of key stakeholders.

The Second Review has built on the foundation of the original RTS and the First Review and has been further refined and now offers greater clarity and is more concise. Most importantly, it provides a strong and improved statement of the desire to ensure that sustainability is at the heart of all future mineral planning in Wales.

*Llinos Quelch*

Chair of the South Wales Regional Aggregates Working Party.

*Andrew Farrow*

Chair of the North Wales Regional Aggregates Working Party.

Date 22<sup>nd</sup> July 2020

## **Statement from the Minister for Energy, Planning & Rural Affairs**

To be Added.

## Executive Summary

Minerals Technical Advice Note 1: Aggregates (2004) (MTAN 1) requires the preparation of Regional Technical Statements (RTS) for the areas covered by both the South Wales and North Wales Regional Aggregates Working Parties (RAWPs). Whereas MTAN1 develops the national policy set out originally in Minerals Planning Policy Wales (now part of Planning Policy Wales - PPW), the RTS provides the supporting detail which allows this to be implemented.

The original RTS documents for both regions were completed in 2008 and are required, by MTAN 1, to be reviewed every five years. The First Review was undertaken in 2013/2014 and this, the Second Review, commenced in 2018.

In contrast with the former guidelines for aggregate provision issued for England and Wales, prior to devolution, the RTS process has always avoided any attempt to make detailed forecasts of future demand based on econometric modelling. In the past, these had been found to be unreliable and were criticised for their lack of transparency. Instead, a series of alternative approaches have been used in Wales and each 5-yearly review of the RTS provides opportunities for further refinement.

The methodology used in the previous (First) Review, in 2014, had been based primarily on historical sales averages, combined with an assessment of the various ‘drivers’ of potential future change. For the Second Review, this has been combined with an attempt to reflect *planned* future requirements for housing construction activity, and to avoid perpetuating historical supply patterns in areas where there is scope to encourage more sustainable patterns of supply. Data used for this purpose have been the housing requirement figures established for existing, adopted, Local Development Plans (LDPs) for each individual Local Planning Authority (LPA). Given that LDP progress has varied from one authority to another, some of the earlier figures are now several years old, but all of them were valid for (or beyond) the ‘baseline’ period (2007 – 2016) covered by this Review. The Steering Group considered that these were the best available consistent source of data for this purpose, with the benefit of having been scrutinised by Inspectors at individual LDP Examinations.

A key factor in the new methodology has been recognition that these housing requirements, in all Local Authority areas in Wales, are more than double the average levels of house completions seen over the last 10 years, and that a corresponding increase in the planned provision of construction materials associated with house construction should therefore be allowed for. This is not necessarily a prediction of future demand, since the housing figures set out in adopted Development Plans will only materialise if economic conditions allow. There is, however, a clear logic in land use planning terms in linking the planned provision of aggregates with that for housing, to ensure that housing plans are not thwarted by an under-provision of aggregates.

Of course, housing accounts for only part of overall construction activity. At a national scale, however, Welsh statistics have revealed a very high degree of correlation between housing completions and aggregate sales. Other statistics (for Great Britain as a whole) show that housing accounts for approximately 30% by value of all new construction. Putting both of these observations together, the implication is that a doubling of house construction would

necessitate a doubling of that 30% element of aggregate sales. At a national level, therefore, and on the basis of being consistent in terms of planned provision for both housing and aggregates, the RTS Steering Group<sup>1</sup> agreed that the provision required for aggregates should be guided by a 30% uplift on historical sales figures.

A further consideration agreed by the Steering Group was that the historical sales figures should reflect, not just the 10-year average (as had been used in the First Review, and as required by the NPPF, in England), but the highest of the 10-year and 3-year averages for each individual LPA. This reflects the fact that in some parts of Wales – notably in the Cardiff City Region – there has been a marked upsurge in construction activity in recent years, and a corresponding growth in aggregate sales.

In **STAGE 1** of the RTS process, the 30% uplift is applied to this composite historical sales figure to obtain an overall **National Guideline** figure for future aggregate production. The uplift is applied only at the national level, because the relationship between construction activity and aggregate sales breaks down at more detailed levels (this being primarily because of the spatial differences between areas of supply and demand).

In **STAGE 2** of the process, the National figure is broken down into two **Regional Guideline** figures (based simply on the historical split of total land-won primary aggregate sales between North and South Wales, which has remained reasonably consistent over many years).

In **STAGE 3**, the regional figures are then apportioned between a series of seven '**sub-regions**', as shown below and, *provided that it is feasible to do so*, between each of the constituent Local Planning Authorities (LPAs). The sub-regions were created, at Welsh Government's suggestion, for the specific purpose of facilitating strategic minerals planning and collaborative approaches between LPAs. They each represent distinctive 'market areas' between which there is relatively little movement of aggregates, except for exports to England, and within which detailed, strategic consideration can be given as to the most appropriate patterns of supply.

In most cases, the distribution of apportionments within each sub-region is achieved through a combination of *quantitative* and *qualitative* judgements, exercised by the RTS Steering Group and facilitated by the appointed consultant. The judgements seek to reflect the Steering Group's collective understanding of market requirements (reflecting both historical sales and the distribution of planned housing activity) together with considerations of existing landbanks, the proximity principle and environmental capacity.

In the final **STAGE 4** of the process, the total apportionments for each LPA are separated into figures for sand & gravel and crushed rock production (based on historical sales proportions in each LPA). Those figures are then multiplied by the number of years required (22 years for sand & gravel, and 25 years for crushed rock) to obtain the total provision required, in millions of tonnes. Comparison of those figures with existing landbanks and existing unworked

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<sup>1</sup> comprising Welsh Government, the two RAWP secretaries, National Resources Wales, the Mineral Products Association, the British Aggregates Association and representatives of one local authority from each Region.

allocations then determines the extent to which any new permissions and/or allocations for future working are required within each authority.

The outcome of this exercise has been a deliberate attempt to control, and in some cases to modify, the future pattern of supply of land-won primary aggregates in Wales, in line with sustainability principles. In a small number of areas, notably where there has been no production of land-won aggregates for many years, with no permitted reserves and zero apportionments, the Steering Group accepted that there may be insufficient evidence, at present, to determine the precise levels of apportionment and resulting allocations required for individual LPAs. In such cases, more detailed analysis will be required, at the local level, through collaboration between adjoining LPAs and consultation with industry, in order to confirm realistic figures for those particular LPAs and (*in exceptional circumstances*) to consider the possibility of alternative patterns of supply within the sub-region concerned.

To this end (and more generally, to ensure that the regional and sub-regional totals recommended by the RTS are achieved), this Review introduces a requirement for all LPAs within each sub-region to produce Statements of Sub-Regional Collaboration (SSRCs), in consultation with industry, through the RAWPs, prior to the Examination of any individual LDP within that area. Specific guidelines relating to the preparation of SSRCs, including details of the circumstances under which alternative patterns of supply may be justified, are provided at Annex A of this document.

More generally, it must be emphasised that the RTS recommendations are intended to be of a **strategic** nature. The recommendations do not provide site-specific information or guidance. It is for the individual LPAs to determine how the strategic requirements identified in the new RTS should be met within their areas. This includes identifying the size and location of new allocations (where these are required by the RTS or, in some cases, by other local factors), and setting out corresponding policies within their LDPs to guide the Development Management process for future mineral extraction.

Moreover, where it is justified by new (e.g. more up to date, more detailed or more precise) evidence, it is open for individual LPAs to depart from the apportionment and allocation figures recommended by the RTS when preparing their LDP policies. In doing so, however, an LPA would need to demonstrate that their intended departure would not undermine the overall strategy provided by the RTS itself (e.g. by working together with other LPAs within the same sub-region to ensure that sub-regional and regional totals are still achieved) and this would need to be reflected in the SSRC agreed with all other constituent LPAs within that sub-region, prior to Examination.

Where the local authorities involved are unable to reach agreement, or if individual local authorities do not accept the revised Regional Technical Statement, the Welsh Government will, as a last resort, consider its default powers to intervene in the Development Plan process (MTAN 1, paragraph A3).

# 1. The Purpose and Objectives of the RTS

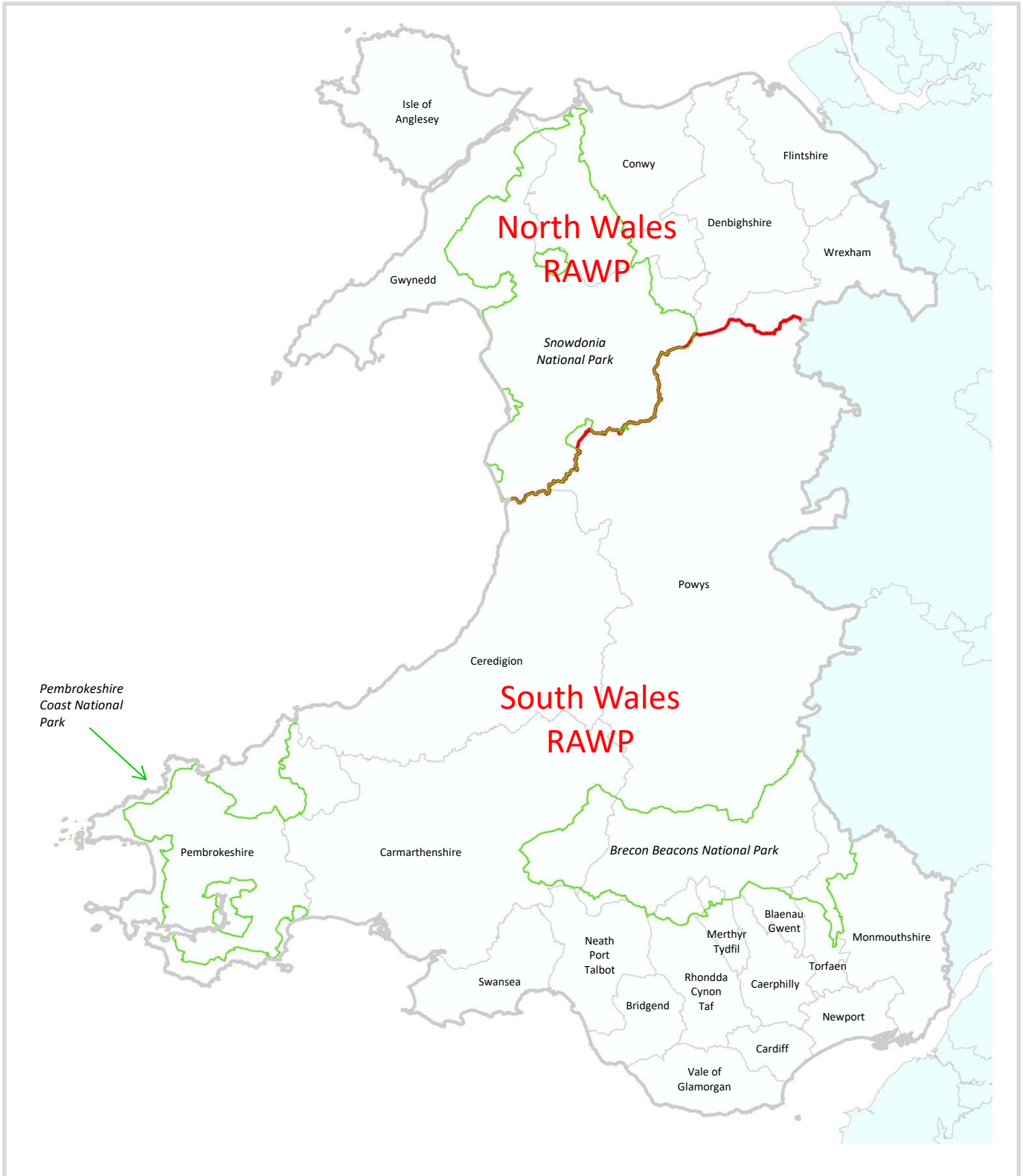
## *Introduction*

- 1.1 Minerals Technical Advice Note 1: Aggregates (2004) (MTAN 1) requires the preparation of Regional Technical Statements (RTS) for the areas covered by both the South Wales and North Wales Regional Aggregates Working Parties (RAWPs) – as shown in Figure 1.1, below. The original RTS documents for both regions were completed in 2008 and are required, by MTAN 1, to be reviewed every five years. The First Review was undertaken in 2013/2014 and this, the Second Review, commenced in 2018.
- 1.2 The Review comprises this main document and the Regional Appendices for North Wales and South Wales, which are issued separately. The two components of the new RTS for each Region (i.e. the main document and the relevant Appendix) are intended to provide a strategy for the future supply of construction aggregates within that Region, taking account of the latest available information regarding the balance of supply and demand, and current notions of sustainability (see below). Together, the two revised RTSs aim to ensure that an adequate and steady supply of aggregates can be maintained throughout Wales (and beyond, in the case of materials that are exported), taking into account the key objectives of sustainable supply outlined in MTAN 1.

## *Policy Context and Sustainability Objectives*

- 1.3 Since the First Review of the RTS was completed in 2014, there have been some important changes in National legislation and Policy within Wales which have a bearing on mineral development. MTAN 1 – and thus the requirement for Regional Technical Statements to be produced and periodically updated – remains extant, but the former Minerals Planning Policy Wales (MPPW) is now subsumed within Planning Policy Wales (PPW), which itself has been updated several times in response to changing legislation and other factors.
- 1.4 The most significant legislative change since 2014 has been the **Well-being of Future Generations (Wales) Act 2015**. This places a statutory duty on public bodies in Wales to consider sustainable development in their decision-making. Whilst sustainability has been at the heart of PPW since it was first published in 2002, the concept has been expanded so that it now incorporates, more explicitly, cultural heritage and well-being.
- 1.5 **Sustainable Development** (in Wales) is now defined, by the 2015 Act, as meaning: *“the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”*.
- 1.6 This is linked to the more traditional definition by the explanation that: *“Acting in accordance with the sustainable development principle means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs”*.

**Figure 1.1: The Distribution of Local Planning Authorities (LPAs) between the two Regional Aggregate Working Parties (RAWPs) in Wales**





- 1.7 The 2015 Act requires public bodies to set out plans as to how they will take decisions in order to meet seven well-being goals that are set out in law. These relate to **prosperity, resilience, health, equality, community cohesion, vibrant culture** (including a thriving Welsh language) and **global responsibility**.
- 1.8 The Act also outlines five ways of working which authorities need to demonstrate they have carried out in undertaking their sustainable development duty. These require consideration to be given to **long term** visions; the **prevention** of adverse impacts; the **integration** of policies to promote balanced decision-making; **collaboration** between public bodies and the private and third sectors; and the built-in **involvement** of the public and stakeholders in the planning system through statutory consultation and engagement. The Regional Technical Statements have always reflected all five of these ways of working, with the concepts of policy integration and collaborative working being enhanced further still in this Review.
- 1.9 In 2018, the Welsh Government updated **Planning Policy Wales** to assist in the delivery of the new act through the planning system. The latest version (Edition 10) was published in December 2018. This introduced five new Key Planning Principles linked variously to the five ways of working. One of these: **Making the Best Use of Resources**, is clearly of direct relevance to mineral planning and thus to the Regional Technical Statements. This principle is explicitly linked, in PPW, to the concept of maintaining a 'long-term' vision with regard to climate change, decarbonisation and the circular economy. The Proximity Principle, which plays an important role in the RTS methodology, is highlighted as a means of ensuring that problems are solved locally rather than passing them on to other places or future generations, and so that the use of land and other resources are sustainable in the long term.
- 1.10 The fifth key planning principle: **Maximising Environmental Protection and Limiting Environmental Impact** is also of direct relevance. This refers explicitly to the need for respecting environmental limits (thereby supporting the notion of Environmental Capacity as used within the RTS). It also highlights the importance of the precautionary principle in ensuring that cost-effective measures to prevent possibly serious environmental damage are not postponed just because of uncertainty regarding the seriousness of potential risks. Whilst this is not explicitly part of the RTS process, it may nevertheless have a bearing on the spatial planning of future allocations.
- 1.11 Specific **minerals planning policies** are now incorporated within PPW (in paragraphs 5.14.1 to 5.14.57), rather than being in the separate Minerals Planning Policy Wales document, as had previously been the case (before 2016). Although the sequence and structure of these policies has been modified, not least to embrace certain aspects of the cultural environment now included within the definition of sustainable development, there are no significant changes in policy requirements that have a bearing on the present Review.
- 1.12 In this regard it is worth noting that one change, which had been introduced in versions 8 and 9 of PPW, has been reversed in the latest edition. This relates to the treatment of Sites of Special Scientific Interest (SSSIs) and National Nature Reserves

(NNRs). In versions 8 and 9 of PPW, these areas were included, along with National Parks and Areas of Outstanding Natural Beauty, as locations where minerals development should not take place, save in exceptional circumstances (whereas previously, in MPPW, that had not been the case). Version 10 has reversed that change, so that SSSIs and NNRs are now included (along with SPAs, SACs and Ramsar sites) within para. 5.14.37, where the requirement is for proposals to be ‘carefully examined’, rather than in para. 5.14.35, which retains the ‘exceptional circumstances’ test. Had this not been reversed, it would have had major implications on the allocation of sites for future working – significantly reducing the scope for finding such sites in areas where the available geological resources are highly constrained.

- 1.13 Overall, the new PPW changes nothing with regard to the RTS process, other than reinforcing the principles which are already enshrined within it.
- 1.14 **The Environment (Wales) Act 2016** introduced the Sustainable Management of Natural Resources (SNMR) and set out a framework to achieve this as part decision-making. The main objective is to maintain and enhance the resilience of ecosystems and the benefits they provide.
- 1.15 The Act requires the Welsh Government to prepare, publish and implement a statutory **Natural Resources Policy** (NRP) setting out its priorities in relation to the sustainable management of natural resources, while Natural Resources Wales (NRW) is required to produce a ‘**State of Natural Resources Report**’ and to prepare ‘**Area Statements**’ to inform place-based action.
- 1.16 The NRP sets out three National Priorities, linked directly to achieving goals within the Well-being of Future Generations (Wales) Act. These are: **delivering nature-based solutions; increasing renewable energy and resource efficiency; and taking a place-based approach.**
- 1.17 The first of these focuses on maintaining and enhancing the ecosystem services derived from natural resources. As well as the more obvious biodiversity-related resources, these include services associated with both mineral extraction and the restoration of former mineral workings. Though not mentioned in the NRP, these are examined in detail in reports for Natural England and Defra on an ecosystems approach to long-term mineral planning in the Mendip Hills (Thompson & Birch 2009; Thompson *et al.* 2010). Ecosystem services have an important bearing on site-specific aspects of mineral development, though probably not at the more strategic regional level being considered within the RTS.
- 1.18 Minerals are more explicitly noted in relation to the second priority (resource efficiency), both in relation to the promotion of recycled and secondary aggregates and the optimal utilisation of primary aggregates. These imperatives are already enshrined within the minerals policies of PPW, however, and are therefore fully incorporated in the methodology for producing apportionments within the RTS.

- 1.19 The third priority – taking a place-based approach – can also be very applicable to mineral development (e.g. through community involvement in planning decisions and restoration proposals). By definition, however, this again is a site-specific issue and is not something which can be addressed at the wider strategic level of the RTS.
- 1.20 It is concluded that, as with the Well-being of Future Generations (Wales) Act 2015 and the revision of PPW, the Environment (Wales) Act 2016 appears to reinforce the principles already enshrined within the RTS process, without imposing any new or different requirements.
- 1.21 In line with those requirements, ***the overarching objective in planning for aggregates provision***, as set out in paragraph 7 of MTAN1 is “*to ensure supply is managed in a sustainable way so that the best balance between environmental, economic and social considerations is struck, while making sure that the environmental and amenity impacts of any necessary extraction are kept to a level that avoids causing demonstrable harm to interests of acknowledged importance*”.
- 1.22 Subsidiary objectives in paragraph 29 of MTAN1, which relate to delivering a more sustainable pattern of supply include:
- examining very carefully existing (permitted) reserves on a national and regional basis to see if they are adequate in the short, medium and long term;
  - only granting permission for future extraction to take place in the most environmentally acceptable locations, in accord with development plans that are informed by the Regional Technical Statement which in turn is based on the environmental capacity assessment;
  - actively reducing the proportion of primary aggregates used in relation to secondary, recycled or waste materials;
  - minimising the transportation of aggregates by road;
  - seeking self-sufficiency within regions, thereby avoiding the need to transfer the environmental costs of aggregates extraction to other areas; and
  - careful and continual assessment of existing and anticipated future exports of aggregates to areas outside Wales (in consultation with those importing regions outside Wales) to determine whether that supply is the best environmental and practicable option for all.
- 1.23 These various objectives, combined with the increased emphasis on collaborative, sub-regional working embedded within this 2<sup>nd</sup> Review, are fully in line with the Sustainable Management of Natural Resources principles enshrined within the Environment (Wales) Act 2016.

### ***The Scope and Purpose of RTS Recommendations***

- 1.24 Each RTS Review provides a mechanism for encouraging the national sustainability objectives relating to minerals to be met by the individual Local Planning Authorities (LPAs) within each Region over a period of up to 25 years (for crushed rock) or 22 years, in the case of land-based sand & gravel (sufficient to cover the MTAN1 requirements for maintaining minimum landbanks of 10 years and 7 years,

respectively, throughout the full 15-year term of each LDP). In the case of Cardiff, which has a 20-year Plan Period, these durations are increased to 30 years (for crushed rock) and 27 years for sand & gravel.

- 1.25 The RTS provides specific recommendations to the constituent LPAs regarding the quantities of aggregate which need to be supplied from each area (**apportionments**) and the nature and size of any **allocations** which may need to be made in their Local Development Plan (LDP) to ensure that adequate provision is maintained throughout the relevant Plan Period. In this Review, the basic recommendations are set out within this document with further details being given in the Regional Appendices.
- 1.26 Paragraph 50 of MTAN1 specifically requires the relevant parts of the RTS strategy (principally, the RTS apportionments and allocation requirements) to be incorporated into individual LDPs. In the present Review, however, apportionment figures are also identified for sub-regional groupings of LPAs and, in a small number of cases, the requirements for individual LPAs within those areas may need to be adjusted, subject to more detailed investigation by the LPAs involved and to industry responses to future calls for sites. Further details of the sub-regional groupings and the apportionment methodology are set out in Chapter Five of this Review.
- 1.27 *In exceptional circumstances*, sub-regional analysis may result in the possibility of alternative patterns of supply being considered within a particular sub-region. In order to facilitate this, and to ensure that the regional and sub-regional totals recommended by the RTS are achieved, this Review introduces a requirement for all LPAs within each sub-region to produce Statements of Sub-Regional Collaboration (SSRCs), in consultation with industry, prior to the Examination of any individual LDP within that area. Specific guidelines relating to the preparation of SSRCs, including of the circumstances under which alternative patterns of supply may be justified, are provided at Annex A of this document.
- 1.28 It must be emphasised that the RTS recommendations are intended to be of a **strategic** nature. The recommendations do not provide site-specific information or guidance. It is for the individual LPAs to determine how the strategic requirements identified in the new RTS should be met within their areas. This includes identifying the size and locations of new allocations (where these are required by the RTS or, in some cases, by other local factors), and setting out corresponding policies within their LDPs to guide the Development Management process for future mineral extraction.
- 1.29 Moreover, where it is justified by new (e.g. more up to date, more detailed or more precise) evidence, it is open for individual LPAs to depart from the apportionment and allocation figures recommended by the RTS when preparing their LDP policies. In doing so, however, an LPA would need to demonstrate that their intended departure would not undermine the overall strategy provided by the RTS itself (e.g. by working together with other LPAs within the same sub-region to ensure that sub-regional and regional totals are still achieved) and this would need to be reflected in

the SSRC agreed with all other constituent LPAS within that sub-region, prior to Examination.

- 1.30 MTAN 1, paragraph A3, notes that “*If the local authorities reach no agreement or if individual local authorities do not accept the Regional Technical Statement, the Welsh Assembly Government will consider its default powers to intervene in the planning process as a last resort*”.
- 1.31 For each Region, Sub-region and individual LPA, the RTS recommendations are informed by the analysis of:
- available resources, permitted reserves, sales and landbanks of primary land-won aggregates;
  - the availability and supply of marine, secondary and recycled materials;
  - levels of demand upon the region for the supply of aggregates, including exports;
  - levels of imports of aggregate into the region;
  - the proximity principle, in relation to the transportation of aggregates; and
  - the environmental capacity of areas to accept the impacts of future quarrying
- 1.32 Further details of the key principles and approaches used within this analysis are set out in the next chapter.

### ***Aims and Objectives of the RTS 2<sup>nd</sup> Review***

- 1.33 The Welsh Government’s **aims** of the 2nd Review have been:
- (i) to confirm or refine the existing methodology and update the current data/information inputs of the current RTS documents; and
  - (ii) to prepare new apportionments and an updated RTS for each RAWP region
- 1.34 These are precisely the same as the aims for the 1st Review.
- 1.35 The **guiding principles** for the review (changed only very slightly from those relating to the 1<sup>st</sup> Review) were identified by Welsh Government as follows:
- (i) *The RTS will be reviewed at 5-year intervals, in line with policy, with a second review to be completed in 2019. The plan period for each RTS will be 25/22 years;*
  - (ii) *To utilise data for the latest year for which information is available as baseline information for the purposes of the review;*
  - (iii) *To have regard to recent research which may identify any issues that need to be covered in the review;*
  - (iv) *The review itself needs to be transparent, engage appropriate stakeholders but recognise that the exercise is largely technical and aimed at providing*

*information and evidence to be utilised in planning processes and therefore consultation and governance should be proportionate,*

- (v) *The review will result in an updated statement for each region which is clear, concise and user friendly;*
- (vi) *Recognise that WG is supportive of collaboration between authorities in negotiating how need, as represented by RTS apportionments, is met, if appropriate;*
- (vii) *The reviews will not start from scratch but will build on the current RTS documents.*

1.36 In order to consider what further adjustments might be needed to the guiding principles and/or the methodology to be used, an RTS Technical Group was convened by the South Wales and North Wales RAWPs. Following internal consultation among RAWP members, the Group's final recommendations were as follows:

- 1) The **base year** for calculation of the apportionment and allocations should be the date of the latest year for which information is available;
- 2) The RTS 2nd Review should calculate the **3-year average** annual production figure and the **10-year average** annual production figure and use the higher of the two figures as the basis for apportionment calculations;
- 3) There should not be a separate landbank for **high PSV rock** but there should be a narrative included in the RTS setting out the considerations to be undertaken if high PSV rock is part of the crushed rock landbank in a particular MPA area;
- 4) Regarding the question of whether **regional groupings of LPAs** should be used for the calculation of landbanks, the Technical Group supported this in principle but considered that identifying appropriate regional groupings should be a task undertaken by an independent Consultant as part of the RTS Review process. The Consultant should also consider whether apportionment should be for a regional area only or whether this should be broken down to each LPA area;
- 5) Regarding the treatment of **ongoing quarrying activity within National Parks**, the Group considered that the position is adequately covered in National Policy. There should therefore be no change to the way in which production within National Parks is monitored and reported. This question specifically relates to current production. It does not relate to landbanks for National Parks as they are subject to the 'exceptional circumstances' test;
- 6) Regarding the issue of **maintaining production capacity** within a particular area, the Group resolved that the consultant appointed to produce the RTS should be asked to consider this for each LPA or region and to identify where there is a danger of under provision within the lifetime of the RTS 2<sup>nd</sup> Review, even though the apportionment figure may be met arithmetically.

- 1.37 Concern was also expressed by the Technical Group about the **potential impact of major projects** on landbanks and the ability of the quarrying industry in Wales to respond to these potential spikes in demand. It therefore advised that one of the considerations to be addressed in carrying out the 2<sup>nd</sup> Review is whether the apportionment calculations for each LPA or region need to be adjusted to reflect these major ‘spikes’ in demand and, if so, how that could be done.
- 1.38 The first of these recommendations is now embedded within the Guiding Principles note above. The second, third and fifth recommendations are also regarded as settled matters and form part of the methodology for the determination of apportionments and allocations within the 2<sup>nd</sup> Review. The fourth and sixth recommendations, together with the additional concern regarding major projects, noted above, were discussed at a series of Stakeholder meetings in Stage 1 of the Review, and are incorporated in the adopted methodology.
- 1.39 Whether or not **Strategic Environmental Assessment** (SEA) should be undertaken was considered as part of the original development of the Regional Technical Statements. It was felt, however that, as the RTS documents primarily represent a collaboratively prepared evidence base and are neither required nor constitute a plan or programme for the purposes of the SEA Directive, such an assessment was not necessary. As with the original RTS documents and the First Review, therefore, at this broad level, and given the further detailed analysis and Plan-making that will be required to implement the RTS through Local Development Plans (where SEA is a formal requirement), it was not considered appropriate or required that SEA should be conducted as part of the Second Review.
- 1.40 Several of the terms used above (e.g. apportionments, allocations, landbanks, permitted reserves and resources) have very specific meanings with respect to minerals planning, which need to be understood. These are all defined in the **Glossary of Terms** at the back of this report. Similarly, a number of commonly-used abbreviations, although explained in the text where they are first introduced, are summarised in the list which follows the glossary.

## 2. Key Principles

### *The RTS Approach*

- 2.1 A key principle which underpins the overall approach within the RTS and MTAN1 is the need to move away from the old, demand-led system of '**Predict and Provide**' to the more modern concept of '**Plan, Monitor and Manage**'. These terms originated in relation to the planning for housing provision but can also be applied to minerals.
- 2.2 It is important to recognise, however, that the Plan, Monitor and Manage system still depends, crucially, on an assessment of demand. At the heart of MTAN1 is the aspiration that, once a reasonable estimate of demand has been obtained, any subsequent fluctuations above that level should be accommodated by increased supplies from secondary and recycled sources (see glossary for definitions), rather than being seen as a justification for granting new planning permissions for primary aggregate extraction. Whilst that aspiration is widely supported, there is evidence to suggest that the percentage contribution available from secondary and recycled sources, having risen from around 10% of the total aggregates market in the 1990s to around 28% during the last decade (as a direct result of financial incentives and promotional work to increase acceptability) is now likely to have peaked. As a consequence of this, the future use of recycled/secondary materials is likely to depend mainly on the level of future construction output (since the availability of recycled materials is closely dependent on rates of new construction). It is therefore perhaps more reasonable to assume that secondary and recycled aggregates will continue to provide a high proportion of total aggregate production but will not be able to be relied upon to fulfil any future peaks in demand on their own: there may also need to be increased contributions from primary aggregate sources.
- 2.3 The RTS process supports this approach by investigating the likely continued availability of secondary and recycled aggregates from all available sources within each area, and factoring this in to an assessment of the residual demand for land-won primary aggregates, as informed primarily by historical sales data and the consideration of planned future construction activity. That residual level of demand is then translated into **apportionments** for each local authority, subject to the consideration of other sustainability issues including proximity and environmental capacity (see below).
- 2.4 An important tool in the ongoing management of the supply of aggregates is the monitoring of **landbanks**. A landbank, as defined in paragraph 45 of MTAN1, is the stock of planning permissions for the winning and working of minerals at *active* and *inactive* sites<sup>2</sup>, at any given point in time and for a given area. Where there is an insufficient landbank of permitted reserves in a particular area to meet the identified demand, over a sustained period of time, the RTS recommends the need for **allocations** for future working to be identified in LDPs. Provided that the

<sup>2</sup> Detailed definitions of active, inactive, dormant and suspended sites are given in the **Glossary of Terms** at the back of this report, as are the full definitions of resources, permitted reserves, apportionments, landbanks, allocations and provision.



reserves at *dormant* sites have not already been included in the landbank calculations<sup>3</sup>, and where a Local Planning Authority considers that such reserves are likely to be capable of being worked within the relevant period (subject to the agreement of modern conditions) it is suggested here that these may be offset against the requirement for new allocations. The same logic applies to sites where permission has been *suspended*, following a stalled IDO or ROMP review (see **Glossary** for full explanations of these various terms).

- 2.5 Thereafter, by virtue of the Plan-led approach, additional applications for new permitted reserves are unlikely to be granted except within allocated sites or areas, unless there are compelling reasons why fluctuations in demand cannot be met from those locations or from alternative (secondary and recycled) sources. The situation is monitored annually by the RAWPs and managed, as required, through periodic (5-yearly) revisions of the Regional Technical Statements.
- 2.6 In terms of its overall approach, the RTS concept represents an important modification of the more general Managed Aggregate Supply System (MASS) which had previously operated across both England & Wales for many years. The main difference is that the Welsh system explicitly seeks to incorporate two key principles of sustainability with respect to aggregates supply: the ***proximity principle*** and the notion of ***environmental capacity***, as explained in the following sections.

### ***The Proximity Principle***

- 2.7 This relates simply to the objective of minimising unnecessary transportation of bulk materials, particularly by road, by ensuring that sources of supply (e.g. aggregate quarries) are located as closely as possible to the main centres of demand (primarily centres of population and major infrastructure projects). The minerals planning system has only limited controls on this: it cannot dictate where aggregates are supplied to, from any given source, and it cannot dictate where suitable sources exist (since minerals can only be worked where they are found). The planning system can, however, provide strong guidance in terms of where planning permissions are likely to be given for new quarries (or extensions to existing quarries) within areas of suitable geology, and it can take account of transportation factors in deciding where these ought to be. In the long term the RTS process has a key role to play in this, by gradually modifying the overall pattern of supply, where this is needed.
- 2.8 The proximity principle needs to be modified, in some cases, by recognition that certain types of ‘high specification aggregate’ (HSA) serve quite different markets and are therefore required for distribution over much greater distances. This applies especially to the skid-resistant aggregates derived from the Pennant Sandstones of South Wales and from a range of other formations within Powys and elsewhere, which are essential for road surfacing applications throughout England and Wales (Thompson, Greig & Shaw, 1993; Thompson *et al.*, 2004). Indigenous sources of HSA

<sup>3</sup> There are differences of interpretation (of MTAN1 guidance) regarding whether or not the permitted reserves at dormant sites should be included in landbank calculations that are used for the purpose of assessing the need, or otherwise, for new allocations. As explained in the **Glossary**, for the purposes of this review, such reserves, and those at suspended sites, have been excluded.

materials within England are very limited, and many are constrained by their location within National Parks. HSA exports from Wales are therefore of major significance. Separate consideration also needs to be given to the issue of high purity limestone production for use as a metallurgical flux, for chemical production and for the manufacture of cement. Whilst these are all non-aggregate end-uses, they are frequently produced from the same geological resources as crushed rock aggregates, but the quarry locations may be determined or justified primarily by the requirements for the higher value industrial products.

- 2.9 The proximity principle is further modified by the requirement in MTAN 1 (paragraph 49) that landbanks do not need to be maintained, and that there should therefore be no future allocations, within National Parks or Areas of Outstanding Natural Beauty (AONBs). This is in line with Planning Policy Wales, which states (at para. 5.14.35) that mineral extraction should not take place in National Parks and AONBs, except in very exceptional circumstances.
- 2.10 The original Regional Technical Statements aimed to reflect the Proximity Principle by providing ‘per capita’ apportionments for future aggregate provision (i.e. proportionate to the population within a given LPA area, as a surrogate for the likely distribution of demand). Major drawbacks of this approach, however, were found to be the lack of correlation between existing population figures and either the demand for, or availability of, aggregate supplies.
- 2.11 In the 1<sup>st</sup> Review of the RTSs, general consideration was given, instead, to variations in *population density*, but account was also taken of a range of other influences, including access routes and transport distances, which neither population nor population density figures are able to reflect. That analysis was, necessarily, of a qualitative nature because of the complexities involved, and to avoid the spurious precision associated with inappropriate quantitative analysis. It allowed the Proximity Principle to be acknowledged but relied primarily on historical sales figures as indicators of demand. This recognised that the demand for supplies from a particular quarry must inevitably be influenced (very strongly) by transport distances, since these constitute a major element of the delivered price. Local sources of supply will therefore always be preferred to those from more distant locations, provided that the material supplied is fit for purpose. Equally, more remote sources would only maintain their commercial viability if they are capable of supplying aggregates of a type that are in high demand but not available from sources located nearer to the markets.
- 2.12 The main criticism of that approach has been that reliance on historical sales figures inevitably perpetuates the historical pattern of supply, giving very limited scope for this to be changed, over time, to achieve any improvement in sustainability. In the present Review, an attempt has therefore been made to use recent data on housing completions and planned future housing provision, both as part of the overall assessment of future demand, and to influence the sub-regional apportionment of future aggregates provision. This is explained more fully in Chapter 3.

## ***Environmental Capacity***

- 2.13 By comparison, the notion of environmental capacity has always been a more controversial issue. The basic principle is clear enough: i.e. that quarrying should be focused, as far as possible, on areas which have the greatest capacity to ‘absorb’ the environmental impacts that are (or may be) associated with quarrying activity, and thus to contribute to future supply with a minimum of adverse impacts. The controversy derives from the lack of consensus in terms of how ‘environmental capacity’ should be defined, and from the way in which this has influenced the allocation targets within the Regional Technical Statements.
- 2.14 In Wales, two previous research projects provided the evidence base for the system that is currently used: **EMAADS** (Establishing a Methodology for Assessing Aggregates Demand and Supply - Arup, 2004) and **IMAECA** (Implementing the Methodology for Assessing the Environmental Capacity for primary Aggregates - Enviros, 2005). These projects resulted in a set of ‘traffic light’ maps (as they are often referred to) being issued to each LPA within Wales to indicate areas of *relatively* high (green), medium (amber) and *relatively* low (red) environmental capacity. The thresholds between these categories were arbitrarily set, but the differentiation between them does at least provide a starting point for the consideration of environmental capacity and thereby enables nationally consistent *strategic* decisions to be made, by the RAWPs, with respect to future aggregates provision.
- 2.15 The colours shown on these maps reflect combined scores from the assessment of twelve different ‘national environmental indicators’ for each square kilometre. These comprised:
- (i) Settlements
  - (ii) Roads
  - (iii) Land Use
  - (iv) SSSIs
  - (v) Heritage
  - (vi) Public Enjoyment
  - (vii) Landscape
  - (viii) Local Landscape
  - (ix) Watercourses
  - (x) Spheres of Influence
  - (xi) Existing Workings
  - (xii) Cumulative Effects
- 2.16 It is important to understand that the IMAECA tool was designed to be used *only* to inform the Regional Technical Statements and explicitly *not* to be used directly in Local Development Plans, Development Management processes and decisions or planning appeal decisions.

- 2.17 The consideration of Environmental Capacity at this strategic level deliberately avoids the direct use of more detailed ‘primary’ environmental information such as the locations of individual designations (other than National Parks and AONBs). Once again, this is to avoid being site-specific and to avoid prejudging issues which need to be addressed in more detail through LDP and Development Management processes at a local level - either within individual local authorities and/or through joint working between neighbouring authorities. Joint consideration of the relationship between mineral resources and environmental designations on a sub-regional basis would potentially allow more detailed consideration to be given to these important issues at a spatial scale which extends beyond the boundaries of an individual local authority. This could tie-in well with the Area-Based Natural Resource Management Approach being promoted by Welsh Government through the **Environment (Wales) Act 2016**.
- 2.18 However, despite this information being available, and being described for each LPA within the original RTs, the environmental capacity results from the IMAECA study had no influence at all on setting the apportionment figures within those reports. That may partially have been due to concerns about not prejudging matters that should properly fall to be dealt with through the Local Development Plan process. This certainly applies to any site-specific judgements but, at a more strategic level, there is both scope and wide support for environmental capacity data to inform and potentially influence the bigger picture.

### ***Changing the Pattern of Supply***

- 2.19 Important consideration also needs to be given to existing patterns of supply. MTAN 1 suggests that these patterns are largely a historical residual and ‘...will need to gradually change to reflect current notions of sustainability’. That may, or may not be the case, however, since the historical supply patterns already have much to commend them: they reflect the **spatial distribution of available resources** (which is of fundamental importance, since minerals can only be worked where they are found) and the **economic imperative** of industry to establish quarries as close as possible to areas of demand (in order to minimise transport costs), subject to a range of environmental designations, planning policies and other constraints. Over many decades, quarries which have become uneconomic because of changing demand or outdated transport networks and rising costs have naturally fallen into disuse. Those which remain are generally (though not always) well-placed to serve the current markets although some remain in conflict with designations, environmental concerns or neighbouring land uses which, in many cases, post-date the mineral planning permissions involved. Where this is the case then, unless there are no sensible alternatives in terms of the availability of resources, it may not be appropriate for the historical supply pattern from a given area to be used as a proxy for future supply from that area.
- 2.20 Together, the implementation of the proximity principle and the notion of environmental capacity, as described above, may gradually induce changes to the existing patterns of supply. But this would only be justified if it is found that, once all aspects of sustainability are taken into account, alternative patterns are seen to

have clear advantages over those which currently exist. Even where changes are clearly justified, these cannot generally be immediately implemented, since (unless Prohibition Orders are issued) existing quarries will be able to continue until their existing planning permissions expire and/or until they run out of permitted reserves.

- 2.21 Nevertheless, the RTS can help to influence future changes in supply pattern, where this is found to be desirable, by adjusting the apportionments given to individual LPAs. This, in turn, will then help to focus new allocations in the areas required, and should eventually result in a shift towards a more sustainable pattern of supply. Chapter 4 of this report presents an overview of the existing supply pattern, highlighting the need for limited adjustments in certain areas, drawing on the more detailed analyses presented in the two Regional Appendices (A and B).

### 3. Methodology for the 2<sup>nd</sup> Review of the RTS

#### *Introduction*

- 3.1 In the original and First Review of the Regional Technical Statements, the starting point for the apportionment of future aggregates provision<sup>4</sup> was to make an assessment of the likely future demand. However, in contrast with the former guidelines for aggregate provision issued for both England and Wales, prior to devolution, the RTS process has always avoided any attempt to make detailed forecasts of future demand based on econometric modelling. In the past, these had been found to be unreliable and were criticised for their lack of transparency. Instead, a series of alternative approaches have been used in Wales and each 5-yearly review of the RTS provides opportunities for further refinement.
- 3.2 The methodology used in the previous (First) Review, in 2014, had been based primarily on historical sales averages, combined with an assessment of the various ‘drivers’ of potential future change – much like the methodology for producing Local Aggregate Assessments in England, but carried out at a national scale. For the present Review, this has been combined with an attempt to reflect planned future requirements for construction activity (particularly housing)<sup>5</sup>, and to avoid perpetuating historical supply patterns in areas where there is scope to encourage more sustainable patterns of supply.
- 3.3 Given the importance of the Plan-led system, there is a need for joined-up thinking between planned construction activity and the planned provision of associated construction materials. This resonates strongly with the integration of policies to promote balanced decision-making: one of the five key ways of working identified in the Well-being of Future Generations (Wales) Act 2015. The concept applies irrespective of whether the planned construction (e.g. housing or major infrastructure projects) materialises. If the planned activity *does* take place, then it will not be hampered by a shortage of materials; if it does not, then there will have been an over-provision of aggregates, but that would not equate to excess production (since aggregates will only be quarried as and when the demand occurs).

#### *Preliminary Research*

- 3.4 In developing the methodology to be applied in the 2<sup>nd</sup> Review, it was first necessary to undertake some preliminary analysis of the source data. This is briefly outlined below under five headings: historical sales data, housing data, economic forecasts, availability of alternative materials and the balance between imports and exports.

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<sup>4</sup> This analysis relates only to the requirements for primary, land-won aggregates. As noted in the original RTS documents, targets for the production of alternative aggregates (i.e. secondary aggregates, recycled materials and marine-dredged aggregates) have traditionally been ‘top-sliced’, leaving a residual demand for land-won primary aggregates. As with the First Review, it was agreed with the Steering Group that the proportion of total aggregates supply provided from secondary and recycled aggregate sources would remain approximately constant, with the actual quantities rising and falling in relation to overall levels of economic activity.

<sup>5</sup> Although planned housing construction may be no more reliable, as an indicator of future demand, than the former aggregate guidelines were, the justification for using such figures is different: it is not an attempt to predict demand, only to ensure consistency in the planning process and to give tangible recognition to the link between construction and aggregates.

Historical Sales Data

- 3.5 The Annual Reports of the South Wales and North Wales Regional Aggregate Working Parties provide an important source of data regarding annual sales and annual updates to the stock of permitted reserves of land-won primary aggregates. They also provide information on secondary aggregates and on landings of marine-dredged aggregates.
- 3.6 The published reports for South Wales currently provide data up to the end of 2016. Those for North Wales provide data up to 2015 but, for the purpose of this Review, the previously published figures have been refined and updated (to include 2016), by the RAWP secretary. The resulting annual totals for the period 2007 to 2016 are presented in Table 3.1, below. This represents the main 'baseline' period for use in the Second Review. All figures are given in millions of tonnes (mt).

**Table 3.1: Annual Sales of Land-won Primary Aggregate in North Wales and South Wales, from RAWP reports.**

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
North Wales Crushed Rock (mt)	6.298	6.225	3.674	4.381	4.348	3.938	4.052	4.626	5.003	5.023
North Wales Land-won Sand & Gravel (mt)	1.063	0.711	0.599	0.664	0.641	0.588	0.529	0.892	0.940	0.726
<b>NW Total (mt)</b>	<b>7.361</b>	<b>6.936</b>	<b>4.273</b>	<b>5.045</b>	<b>4.989</b>	<b>4.526</b>	<b>4.581</b>	<b>5.518</b>	<b>5.943</b>	<b>5.749</b>
South Wales Crushed Rock (mt)	12.51	10.35	8.13	7.20	7.73	7.39	7.55	7.87	8.31	8.41
South Wales Land-won Sand & Gravel (mt)	0.24	0.03	0.14	0.12	0.11	0.27	0.28	0.20	0.27	0.16
<b>SW Total (mt)</b>	<b>12.75</b>	<b>10.38</b>	<b>8.28</b>	<b>7.32</b>	<b>7.84</b>	<b>7.66</b>	<b>7.83</b>	<b>8.07</b>	<b>8.58</b>	<b>8.57</b>
<b>Wales Total (mt)</b>	<b>20.11</b>	<b>17.32</b>	<b>12.54</b>	<b>12.37</b>	<b>12.83</b>	<b>12.19</b>	<b>12.41</b>	<b>13.59</b>	<b>14.52</b>	<b>14.32</b>
NW/SW Split (%)	37/63	40/60	34/66	41/59	39/61	37/63	37/63	40/60	41/59	40/60

SOURCE: Annual RAWP reports, updated (for North Wales) by the RAWP Secretary, for the purposes of this review<sup>6</sup>.

- 3.7 It is important to remember that the historical sales figures represent only the residual demand for land-won primary aggregates, since the overall demand over this period was also satisfied, to varying degrees, by supplies from secondary, recycled and marine aggregate sources, as well as by small amounts of imports from primary aggregate sources in England. By default, therefore, using historical sales data as part of the basis for estimating future demand assumes that the supply of secondary, recycled, marine and imported aggregates will continue as before (with different levels of contribution from each source in each of the various LPAs).

<sup>6</sup> Whilst the data presented in Table 3.1 are useful in showing the year-to-year variations, the totals are slightly different from those presented in all subsequent tables in this report, which were derived from new, and more accurate figures collated by both RAWP secretaries for the specific purpose of this review.

- 3.8 In the First Review, historical sales data were represented by the average sales over the preceding 10-year baseline period. For the present Review, it was decided that consideration should also be given to average sales over the most recent 3-year period (2014 to 2016), in recognition of the fact that for some areas (notably Cardiff, and the three main 'exporting' LPAs of Flintshire, Wrexham and Powys), there has been a sharp increase in recent production. The RTS Steering Group's view was that the highest of the 10-year and 3-year averages, for each LPA, should be used in calculating a more representative National total. Table 3.2, below, presents the figures for each LPA and the derived total. The LPAs are listed simply in alphabetical. Their geographical distribution and arrangement into the North Wales and South Wales RAWP areas, are shown in Figure 1.1, above.

**Table 3.2: 10-year and 3-year Total Land-Won Primary Aggregates Sales Averages (to 2016) for each LPA.**

<b>Unitary Authority</b>	<b>10-yr Average Aggregate Sales (total) (mtpa)</b>	<b>3-yr Average Aggregate Sales (total) (mtpa)</b>	<b>Highest of 3-yr and 10-yr ave. sales in each LPA (mtpa)</b>
Blaenau Gwent	0.170	0.180	0.180
Brecon Beacons National Park	0.490	0.540	0.540
Bridgend	0.580	0.600	0.600
Caerphilly	0.390	0.100	0.390
Cardiff	0.830	1.060	1.060
Carmarthenshire	0.832	0.821	0.832
Ceredigion	0.300	0.240	0.300
Conwy + Snowdonia NP	0.955	0.813	0.955
Denbighshire	0.329	0.043	0.329
Flintshire	2.663	3.204	3.204
Gwynedd	0.868	0.898	0.898
Isle of Anglesey	0.236	0.255	0.255
Merthyr Tydfil	0.150	0.010	0.150
Monmouthshire	0.070	0.060	0.070
Neath Port Talbot	0.460	0.300	0.460
Newport	0.000	0.000	0.000
Pembrokeshire	0.510	0.360	0.510
Pembrokeshire Coast NP	0.330	0.270	0.330
Powys	2.470	2.650	2.650
Rhonda Cynon Taf	0.610	0.670	0.670
Swansea	0.000	0.000	0.000
Torfaen	0.000	0.000	0.000
Vale of Glamorgan	0.660	0.580	0.660
Wrexham	0.435	0.514	0.514
<b>TOTAL, Wales</b>			<b>15.557</b>

(SOURCE: RAWP Secretaries, 2018)

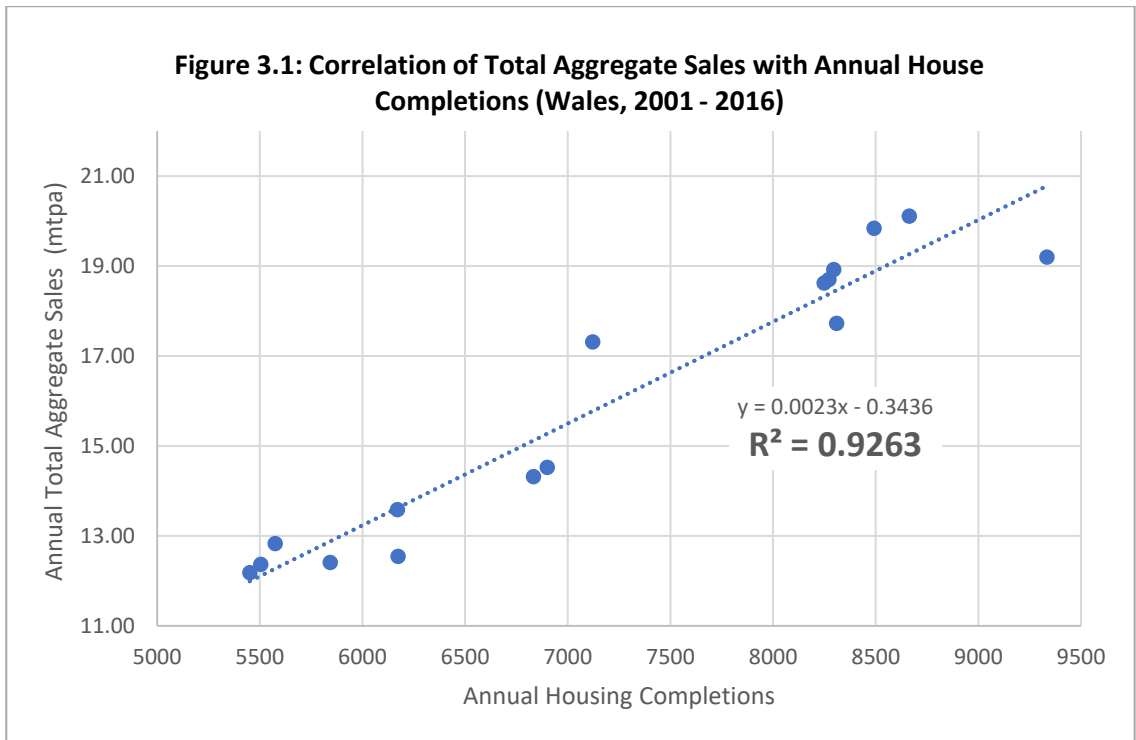
- 3.9 This National total of 15.557mt compares with an equivalent figure of 17.69 mt for the First Review (based on the 10-year average, only, for the period 2001 to 2010).



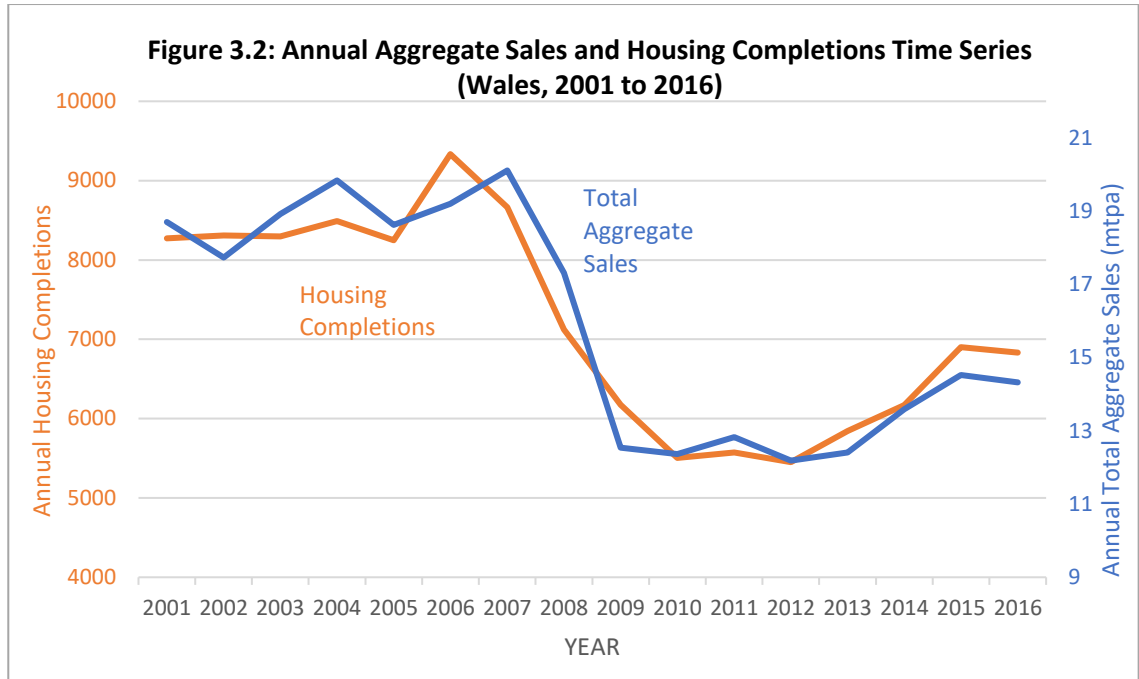
This marked reduction reflects the fact that the baseline for the present Review includes the whole of the recent economic recession, whereas the previous baseline period incorporated only part of the recession together with a preceding period of significantly higher sales.

Housing Data

- 3.10 Statistics on housing completions (and housing starts) for each LPA in Wales are reported on the Welsh Government’s ‘StatsWales’ website<sup>7</sup>. The data are reported in financial, rather than calendar years, so are not directly compatible with aggregate sales data, but comparisons over time can nevertheless reveal important trends. In doing so, two particular findings clearly emerged.
- 3.11 Firstly, an extremely high degree of correlation was revealed, at a national level, between annual house completions and annual sales of aggregates, with a correlation coefficient ( $R^2$ ) of 0.9236. This is illustrated in Figure 3.1 below. The two time series are compared in Figure 3.2, demonstrating their very close similarity of responses to the recent sharp recession and subsequent faltering recovery.



<sup>7</sup> <https://statswales.gov.wales/Catalogue/Housing/New-House-Building/newdwellingscompleted-by-area-dwellingtype-numberofbedrooms>



- 3.12 In considering the correlation shown in these diagrams, it is important to note that, whilst there is obviously a causal link between house building and aggregate consumption, the apparent strength of that correlation may be at least partly explained by the fact that both factors are governed by a separate, completely independent variable – that of economic growth.
- 3.13 It must also be recognised that housing accounts, directly, for only a proportion of aggregate sales. A projection of future housing growth (or decline), however reliable, could not be used with any confidence to predict the exact growth or decline of aggregate sales (at most it could only help to predict the proportion of those sales which are directly associated with house construction).
- 3.14 Similar analyses at regional and sub-regional levels were attempted but produced much weaker correlations – particularly in areas where a significant proportion of demand is associated with exports to England, rather than with domestic construction activity (as is the case in north-east Wales, for example, and in Powys).
- 3.15 The second observation relates to the comparison between annualised figures for future housing requirements<sup>8</sup>, derived from the totals set out in adopted Local Development Plans throughout Wales, and actual housing completions data over the 10-year baseline period, as recorded by the Welsh Government. This comparison is presented in Table 3.3. below, with the LPAs again listed in alphabetical order.

<sup>8</sup> The data used here relates specifically to housing **requirements**, as objectively assessed for each LPA, rather than the figures for housing **provision** adopted in LDPs which are usually higher, following the inclusion of variable allowances in each LPA for ‘flexibility’. The requirement figures were agreed, at a meeting of the two RAWPs, in July 2019, to be a more reliable basis for analysis. Given that LDP progress has varied from one authority to another, some of the earlier figures are now several years old, but all of them were valid for (or beyond) the ‘baseline’ period (2007 – 2016) covered by this Review. The Steering Group considered that these were the best available, consistent source of data for this purpose, with the benefit of having been scrutinised by Inspectors at individual LDP Examinations.

**Table 3.3: Comparison of Housing Requirements in Local Development Plans with average Annual Housing Completions in Wales (as of December 2018)**

Unitary Authority	Plan Status	Plan period	Planned Future Housing Requirements	Annualised Future Housing Requirements	Average House Completions per year (2008 – 2017)
Blaenau Gwent	Adopted	2006-2021	3,500	233	99.1
Bridgend	Adopted	2006-2021	9,690	646	365
Caerphilly	Adopted	2006-2021	8,625	575	335.2
Cardiff	Adopted	2006-2026 <sup>9</sup>	41,415	2,761	825.3
Carmarthenshire	Adopted	2006-2021	15,197	1,013	517.8
Ceredigion	Adopted	2007-2022	6,000	400	126.1
Conwy	Adopted	2007-2022	6,520	435	178.6
Snowdonia	Adopted	2016-2031	770	51	
Denbighshire	Adopted	2006-2021	7,500	500	156.2
Flintshire	in Progress	2015-2030	6,950	463	288.6
Gwynedd	Joint LDP Adopted	2011-2026	7,184	479	170.4
Isle of Anglesey					109.6
Merthyr Tydfil	Adopted	2006-2021	2,250	150	133.2
Brecon Beacons N.P.	Adopted	2007-2022	1,990	133	
Monmouthshire	Adopted	2011-2021	4,500	450	228.6
Neath Port Talbot	Adopted	2011-2026	7,800	520	274.3
Newport	Adopted	2011-2026	10,350	690	527.5
Pembrokeshire	Adopted	2006-2021	5,700	380	240
Pembrokeshire Coast NP	Adopted	2006-2021	1,599	107	
Powys	Adopted	2011-2026	4,500	300	191.7
Rhonda Cynon Taf	Adopted	2006-2021	14,385	959	373.9
Swansea	Adopted	2010-2025	15,600	1,040	519.4
Torfaen	Adopted	2006-2021	4,700	313	174.6
Vale of Glamorgan	Adopted	2011-2026	9,460	631	284.3
Wrexham	at Examination	2013-2028	7,750	517	304.2
<b>TOTAL, Wales</b>			<b>203,935</b>	<b>13,746</b>	<b>6,423.6</b>

3.16 It is evident from Table 3.3 that in every local authority, the levels of future housing requirements are substantially greater than recent levels of completion. For the country as a whole, the planned figures are more than double the average level of annual completions.

3.17 In reality, notwithstanding the fact that the housing figures have been scrutinised in terms of their 'deliverability' as part of the Local Plan process, and should therefore

<sup>9</sup> Although Cardiff's adopted LDP covers the period 2006 to 2026, work on the plan actually commenced in 2011 following withdrawal of the previous LDP (which covered the period 2006 to 2021). The start date remained at 2006 because much of the evidence base for the withdrawn plan was used to inform the new plan in order to avoid unnecessary expenditure in preparing new evidence where it was not required. This effectively means the plan is a 15-year plan (as for all others), expiring in 2026.

be 'sound', the planned delivery of new houses will only be achieved if economic and other conditions allow. The figures are therefore not predictions and cannot be used as a basis for predicting future demand.

- 3.18 There is, nevertheless, a clear logic behind the notion that levels of housing requirements that are accepted for inclusion in adopted LDPs should be underpinned by a planned sufficiency of construction aggregates. As noted in para. 3.3, above, this ties-in with, and is supported by, the notion of integrating policies to promote balanced decision-making: one of the five key ways of working identified in the Well-being of Future Generations (Wales) Act 2015. **A decision was therefore made to move away from any attempt to predict future demand and to focus, instead, on making sure that future aggregates provision is reasonably matched to the planned requirements for housing construction.**

#### Economic Forecasts

- 3.19 Notwithstanding that decision, it is still useful to give at least some consideration to established economic forecasts, since these may have a bearing on whether or not the planned construction activity is able to be delivered.
- 3.20 In the First Review, it was found that there was a degree of correlation between past aggregate sales and the annual change (% growth or decline) in **Gross Domestic Product** (GDP), as a measure of economic activity. GDP out-turn figures are readily available (on the Eurostat website) and GDP forecasts are published regularly in the Economic and Fiscal Outlook reports from the Office of Budget Responsibility. Table 3.4, below, compares land-won aggregate sales in Wales, over each of the last 16 years (again combining data for the last review period as well as this one), against published data on the annual percentage change in GDP for the UK.
- 3.21 The resulting graphs (Figures 3.3 and 3.4) reveal the a relatively limited degree of correlation between the two datasets and a noticeable disconnect between the speed of recovery of aggregate sales following the recession, compared with that of GDP growth. This may be at least partly because the GDP figures are available only for the UK as a whole, and not specifically for Wales. It is concluded that these offer very limited insight regarding future aggregate requirements in Wales, and that GDP data should not be used in the assessment of future requirements for aggregates provision.

#### Availability of Alternative Aggregates

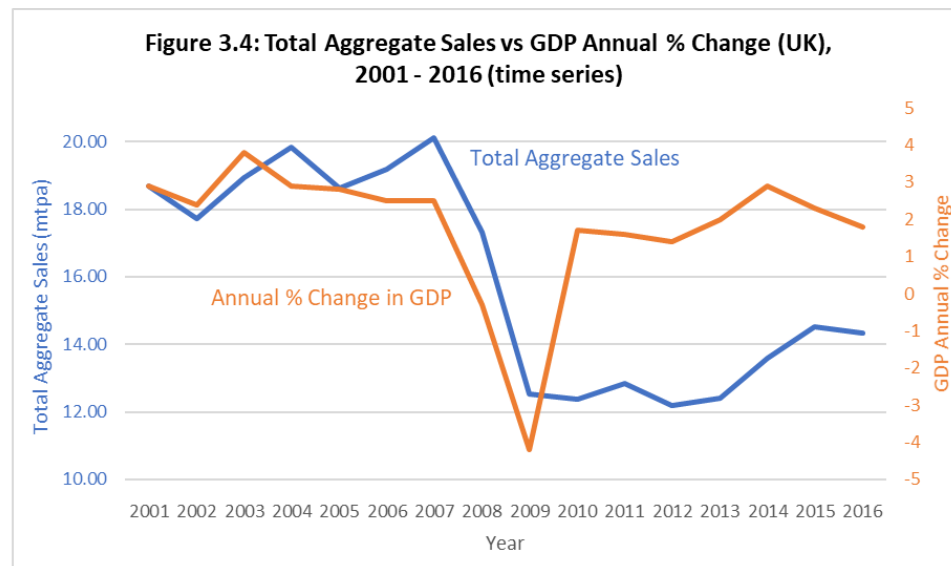
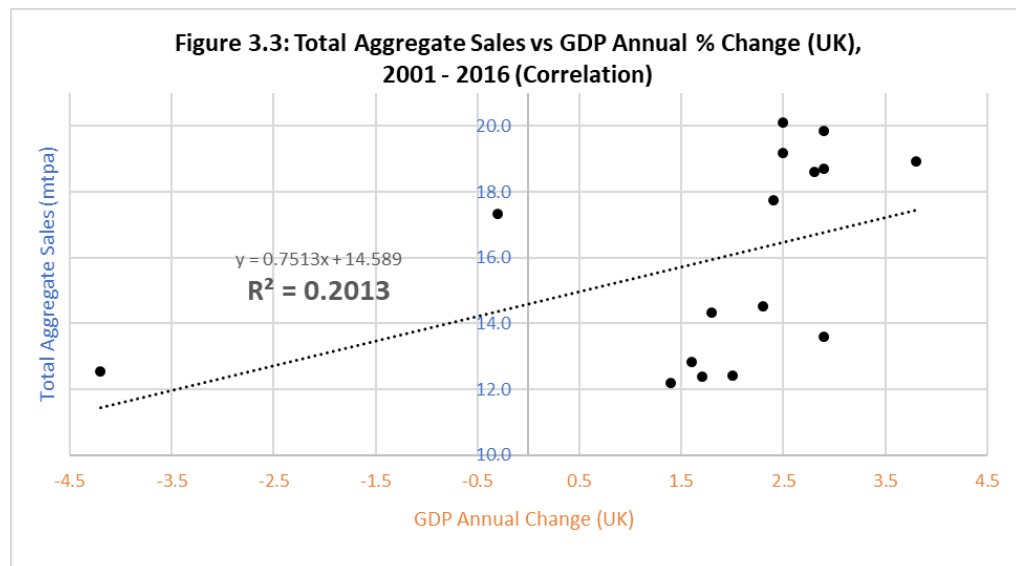
- 3.22 In considering possible trends in the demand for land-won primary aggregates, consideration needs to be given to the availability of alternative (particularly secondary and recycled but also marine) aggregate sources. Such materials are 'top sliced' in terms of policy preferences, such that only the 'residual' demand needs to be supplied from primary, land-won materials.

**Table 3.4: Annual Aggregate Sales and GDP Data.**

	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Crushed Rock * (mt)	16.97	16.18	17.46	18.30	16.95	17.75	18.81	16.58	11.8	11.58	12.08	11.33	11.6	12.5	13.31	13.43
Land-won Sand & Gravel * (mt)	1.73	1.55	1.47	1.54	1.68	1.45	1.3	0.74	0.74	0.78	0.75	0.86	0.81	1.09	1.21	0.89
<b>Total * (mt)</b>	<b>18.70</b>	<b>17.73</b>	<b>18.92</b>	<b>19.84</b>	<b>18.62</b>	<b>19.20</b>	<b>20.11</b>	<b>17.32</b>	<b>12.54</b>	<b>12.37</b>	<b>12.83</b>	<b>12.19</b>	<b>12.41</b>	<b>13.59</b>	<b>14.52</b>	<b>14.32</b>
GDP (UK) – Annual % change **	2.9	2.4	3.8	2.9	2.8	2.5	2.5	-0.3	-4.2	1.7	1.6	1.4	2	2.9	2.3	1.8

\* SOURCE: Annual RAWP reports, updated (for North Wales) by the RAWP Secretary, for the purposes of this review.

\*\* SOURCE: ([https://ec.europa.eu/eurostat/data/database?p\\_p\\_id=NavTreeportletprod\\_WAR\\_NavTreeportletprod\\_INSTANCE\\_nPqeVbPXRmWQ&p\\_p\\_lifecycle=0&p\\_p\\_state=normal&p\\_p\\_mode=view&p\\_p\\_col\\_id=column-2&p\\_p\\_col\\_pos=1&p\\_p\\_col\\_count=2](https://ec.europa.eu/eurostat/data/database?p_p_id=NavTreeportletprod_WAR_NavTreeportletprod_INSTANCE_nPqeVbPXRmWQ&p_p_lifecycle=0&p_p_state=normal&p_p_mode=view&p_p_col_id=column-2&p_p_col_pos=1&p_p_col_count=2))



### Secondary Aggregates

- 3.23 Secondary aggregates comprise the by-products of various industrial processes, including metallurgical slags and power station arisings, but also the by-products from certain types of non-aggregate mineral extraction, such as colliery spoil and slate waste, and from the recycling of glass, ceramics, asphalt planings and rail ballast<sup>10</sup>.
- 3.24 Aggregate production from metallurgical slags occurs only in South Wales. Port Talbot continues to produce both blast furnace (iron) and steel slag, whilst electric arc furnace steel slag is still produced from one site in Cardiff. The processing of older stockpiles of blast furnace slag at the former Llanwern steel works is now understood to have ceased. Secondary aggregates are produced from all of these materials although volumes are thought to be declining, with a consequent increase in the demand for primary aggregates.
- 3.25 Coal-fired power station arisings, comprising pulverised fuel ash (PFA) and furnace bottom ash (FBA) are currently produced only at the Aberthaw Power Station, in South Wales. With the planned closure of all coal-fired power stations by 2025, this production will cease. Whether or not historic PFA stockpiles will be able to be worked in future remains to be seen.
- 3.26 Small amounts of aggregate minerals (sandstone and occasionally sand) arise adventitiously from the reworking of former colliery spoil tips or from the working of opencast coal. The amounts and their suitability for use as construction aggregates are highly unpredictable, however, and quantities can vary greatly over time. Many former colliery waste tips in Wales have either been landscaped as part of reclamation schemes or utilised for base fill material. Volumes still available are very limited in North Wales but more significant in parts of the South Wales coalfield. The overall potential for producing aggregate from this material is considered to be small, for a combination of local, fiscal and regulatory reasons, but could be locally significant, particularly within Torfaen and Blaenau Gwent. Here, there may be opportunities for the material to make up for the very limited existing and potential sources of primary aggregate production, although the quality of the material and the quantities available for anything other than low grade fill, have yet to be demonstrated.
- 3.27 Sandstone arisings from new opencast workings have been important as ‘windfall’ resources at a number of sites within the South Wales coalfield, but these are classed as primary aggregates and are therefore not considered further here.
- 3.28 Crushed slate, derived either from slate waste (as a by-product of roofing material production) or quarried specifically for use as aggregate, features significantly in the overall pattern of supply with in North Wales (particularly in Gwynedd), but not in South Wales. Slate is included in the overall figures for crushed rock production

<sup>10</sup> it might appear more logical to group these recycled materials with aggregates produced from recycled construction, demolition and excavation wastes (CD&EW). However, the coverage of CD&EW is already well defined in terms of survey returns, so those items are included here as secondary aggregates.

within the North Wales RAWP reports though not in the AM Surveys. Although output fell during the recent recession, the proportions have remained high, suggesting an underlying increase in the market for slate aggregate. However, given that slate production is already included in the crushed rock statistics, this trend has no implications for the overall level of future demand for primary aggregates, only for the balance between slate and other types of crushed rock.

- 3.29 The various sources of secondary aggregate noted above, together with recycled aggregates, as discussed below, are currently exempt from the Aggregates Levy, in a deliberate attempt to minimise the use of primary aggregates. During 2019 and 2020, the Aggregates Levy was comprehensively reviewed by HMRC, but no changes have been made to those exemptions.

#### **Recycled Aggregates**

- 3.30 Aggregates produced from the recycling of construction, demolition and excavation wastes (CD&EW) form an important contribution to the overall supply of construction aggregates. The 2008 RTSs identified a total output for the whole of Wales of 3.97mt, based on 2005 survey data, and suggested a roughly 3 to 1 split between South Wales and North Wales, based on earlier surveys and population ratios. They also noted that, despite the lack of quantitative detail, it is inevitable that the greatest volumes of CD&EW arisings and usage are in the urban areas. The RTS documents emphasised, however, that all statistics for this sector need to be used with a high degree of caution, because of the low rate of response to the surveys.
- 3.31 The situation, in terms of available data, has not improved since the original RTSs were published. No new survey data is available, so any observations on recent or future trends can only be regarded as broad approximations. If anything, the efficiency of recycling is likely to have increased, and the introduction of WRAP's (2005) 'Quality Protocol' for the production of aggregates from inert waste may have increased the proportion and usage of higher value products derived from the various recycled sources. Such improvements, however, represent only small increments on the progress which had previously been made - primarily as a consequence of the price advantages resulting from the landfill tax and, to a lesser extent, the aggregates levy. The view of the Mineral Products Association (MPA), which is not disputed by the NRW, remains that there is little opportunity for significant further increase in the proportion of construction aggregate likely to be derived from this sector. As noted earlier, the future availability of recycled aggregates seems likely to be inextricably linked to the overall rates of construction activity and economic growth, so the safest assumption is that it will rise and fall in a very similar way to overall demand, and will thus have a neutral impact on the demand for primary aggregates, compared to the baseline period (2007 to 2016).

#### **Marine-dredged Aggregates**

- 3.32 Marine-dredged aggregates are of major importance in South Wales, with supplies being sourced from the Severn Estuary and the Bristol Channel, but are of very limited importance in North Wales. In south east Wales, marine-dredged material

accounted for 100% of all sand & gravel production over the baseline period (2007 to 2016), reflecting the complete lack of historical (or current) land-based sand & gravel extraction in that area, despite the existence of potential land-based resources.

- 3.33 For the time being, it seems reasonable to suppose that marine-dredged aggregates will continue to supply a similar proportion of overall demand as they have done over the last decade, so the demand for land-won aggregates in any of the sub-regions of either South Wales or North Wales is not likely to be affected.

#### Imports and Exports

- 3.34 The periodic Aggregate Mineral (AM) Surveys usefully include data on the distribution of aggregates from supply areas to destinations, and on the mode of transportation used. Such data is far from perfect, not least because it is only the initial destination that is recorded. In many cases this may be simply an intermediate processing and/or distribution depot, from which the products travel further. Nevertheless, it is the only available source of distribution data, and is therefore very important to the RTS process.
- 3.35 Table 3.5, on the following page, derived from information presented in Tables 4j and 4k of the AM Reports, reveals the extent to which aggregates produced in North Wales and South Wales are exported (either between those regions or, primarily, to England).
- 3.36 In North Wales, the main aggregate exports, by far, are those of Carboniferous Limestone which primarily are supplied to North West England. The AM Survey figures for North Wales generally show that, as overall sales fell during the recent recession – between 2005 and 2009, the proportion (as well as the totals) of exports also fell. This implies that, during periods of recession, for general-purpose limestone aggregates, there is a reduced dependence by importing regions on supplies from more distant sources, as would be expected. But the reverse is also true: as the economy has recovered from recession, since 2009, the demand for exports from North Wales has increased once again, and more quickly than the overall rate of economic growth.
- 3.37 In South Wales, the main export is of sandstone, the vast majority (almost 90%) of which is High Specification Aggregate (HSA) - skid-resistant road surfacing material with a Polished Stone Value (PSV) of 58 or above, and generally much higher (Thompson, Greig & Shaw 1993; Thompson *et al*, 2004). As noted earlier, these exports are of major importance because of the limited sources of unconstrained HSA materials within England. Reference to Table 3.5 shows that, although there was a reduction in sandstone exports between 2005 and 2009, the difference was much less marked than was the case for limestone exports from North Wales, especially in percentage terms. This reflects the fact that the market for skid-resistant road aggregate held up better, during the recession, than was the case for more general-purpose limestone aggregate (presumably because of the safety imperative of continuing to maintain skid resistance on major roads).



**Table 3.5: Summary of Regional-scale export data from recent AM Surveys**

<i>Note: all figures exclude sales for non-aggregate use</i>	<b>AM2001</b> (mt)	<b>AM2005</b> (mt)	<b>AM2009</b> (mt)	<b>AM2014</b> (mt)
<b>North Wales</b> (data from Table 4k of the AM reports)				
Land won Sand & Gravel Sales	1.342	1.192	0.589	0.897
S&G Exports*	0.544	0.508	0.128	0.158
<b>Exports as % of S&amp;G total</b>	<b>41%</b>	<b>43%</b>	<b>22%</b>	<b>18%</b>
Limestone Sales	6.062	4.641	2.636	3.508
Limestone Exports*	3.344	2.973	1.116	2.226
<b>Exports as % of Limestone total</b>	<b>55%</b>	<b>64%</b>	<b>42%</b>	<b>64%</b>
Igneous Sales	1.136	1.022	0.610	0.660
Igneous Exports*	0.091	0.277	0.064	0.054
<b>Exports as % of Igneous total</b>	<b>8%</b>	<b>27%</b>	<b>10%</b>	<b>8%</b>
Sandstone Sales	0	0	0	0
Sandstone Exports*	0	0	0	0
<b>Exports as % of Sandstone total</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>
Total Crushed Rock Sales**	7.198	5.663	3.245	4.168
Total CR Exports*	3.436	3.251	1.178	2.280
<b>North Wales CR Exports as % of CR total</b>	<b>48%</b>	<b>57%</b>	<b>36%</b>	<b>55%</b>
<b>South Wales</b> (data from Table 4j of the AM reports)				
Land won Sand & Gravel Sales	0.115	0.304	0.144	0.205
S&G Exports*	0.001	0.011	0	0
<b>Exports as % of S&amp;G total</b>	<b>1%</b>	<b>4%</b>	<b>0%</b>	<b>0%</b>
Limestone Sales	6.536	6.137	4.554	4.540
Limestone Exports*	0.262	0.154	0.052	0.332
<b>Exports as % of Limestone total</b>	<b>4%</b>	<b>3%</b>	<b>1%</b>	<b>7%</b>
Igneous Sales	0.838	1.238	1.025	1.577
Igneous Exports*	0.572	0.430	0.694	0.829
<b>Exports as % of Igneous total</b>	<b>68%</b>	<b>35%</b>	<b>68%</b>	<b>53%</b>
Sandstone Sales	2.648	3.498	2.605	1.709
Sandstone Exports*	1.457	1.941	1.258	0.852
<b>Exports as % of Sandstone total</b>	<b>55%</b>	<b>55%</b>	<b>48%</b>	<b>50%</b>
Total Crushed Rock Sales**	10.310	10.873	8.185	7.825
Total CR Exports*	2.302	2.527	2.003	2.013
<b>South Wales CR Exports as % of CR total</b>	<b>22%</b>	<b>23%</b>	<b>24%</b>	<b>26%</b>

\* 'exports' are primarily to England but include some movement between South Wales and North Wales.

\*\* Unlike the figures used elsewhere in this Review, crushed rock sales in the AM reports exclude slate

3.38 Wales has always been a net exporter of construction aggregates and imports of land-based aggregates from England are very minor, by comparison with exports. In North Wales, imports in 2014 (from Table 5k of the AM 2014 report) amounted to just 0.023mt of land-won sand & gravel, and only 0.128mt of crushed rock, most of which comprised igneous rock from neighbouring South Wales and Limestone from South West England. In South Wales in 2014 (from Table 5j), land-based imports amounted to 0.042mt of sand & gravel and 0.079mt of crushed rock, primarily limestone from South West England.

- 3.39 Imports and exports of marine-dredged sand and gravel between England and Wales are only relevant to the RTS apportionment exercise if they affect the continuity of supply of these materials to Wales and thus give rise to increased demand on land-based resources. This is potentially an issue in South East Wales which, as noted earlier, is heavily dependent upon marine aggregates. At the time of the First Review, Wales was a net importer of marine sand & gravel, dredged from the English side of the median line in the Bristol Channel and the Severn Estuary. This was noted in the Review as being likely to change, subject to the approval of new licence applications within Welsh waters. By 2019, the relative balance between imports and exports has shifted as a consequence of a new licence that has been recently permitted across the median line between English and Welsh waters. However, significant trade continues from English licences to Welsh markets as well as vice versa. In Liverpool Bay, the only licence area in Welsh waters remains a net exporter to north west English markets.
- 3.40 Recent AM Surveys have also included information on aggregate movement between sub-regions. In Wales the sub-regions used for this purpose<sup>11</sup> comprise:
- **North-East Wales** (Conwy, Denbighshire, Flintshire and Wrexham);
  - **North-West Wales** (Isle of Anglesey, Gwynedd & the Snowdonia National Park);
  - **South-East Wales** (Swansea, Neath Port Talbot, Bridgend, Rhondda Cynon Taf, Merthyr Tydfil, Caerphilly, Blaenau Gwent, Torfaen, Monmouthshire, Newport, Cardiff and the Vale of Glamorgan); and
  - **‘the Remainder of South Wales’** (Pembrokeshire, Pembrokeshire Coast National Park, Ceredigion, Carmarthenshire, Powys and the Brecon Beacons National Park).
- 3.41 Table 3.6, below, shows the results for crushed rock, for each mineral planning authority. In each case, figures are given for sales within the same sub-region, sales to directly adjoining sub-regions within Wales, and sales to other sub-regions, including those in England.
- 3.42 Similar data is available for sand & gravel aggregates, although the quantities involved are extremely small, except in the case of Wrexham, where 51% is sold within NE Wales, 27% in NW Wales and 22% elsewhere (primarily England).

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<sup>11</sup> The sub-regions used for the AM Surveys should not be confused with those used for the analysis of future apportionments in this Review, as described on page 53 and shown in Figure 5.2.

**Table 3.6: Sub-Regional export data for crushed rock aggregates\* from the AM 2014 Survey report (Mankelov et al, 2016), expressed as percentages of total sales.**

<i>Note: all figures exclude sales for non-aggregate use</i>	Sales within sub-region	Sales to adjoining sub-regions in Wales	Sales to other sub-regions and to England
<b>North Wales</b> (data from Table 9k of the AM report)			
Conwy	25%	40%	35%
Denbighshire**	(44%)	(0%)	(56%)
Flintshire	33%	0%	66%
Gwynedd	77%	21%	3%
Isle of Anglesey	70%	17%	12%
Wrexham	-	-	-
<b>South Wales</b> (data from Table 9j of the AM report)			
Blaenau Gwent	100%		0%
Brecon Beacons National Park	2%	98%	0%
Bridgend	100%	0%	0%
Caerphilly	54%	46%	
Cardiff	39%	61%	0%
Carmarthenshire	23%	77%	0%
Ceredigion	100%	0%	0%
Monmouthshire	-	-	-
Neath Port Talbot	11%	57%	32%
Newport	-	-	-
Pembrokeshire	66%	34%	0%
Pembrokeshire Coast National Park			
Powys	26%	6%	68%
Rhondda, Cynon, Taf	80%	0%	20%
Swansea	-	-	-
Torfaen	-	-	-
Vale of Glamorgan	65%	35%	0%

\* Unlike the figures in Tables 3.3 and 3.4, above, crushed rock sales exclude slate

\*\* Denbighshire was omitted from Table 9k of the AM 2014 report, so the figures shown here are from AM 2009.

### **Agreed Methodology**

- 3.43 The foregoing analysis indicates that there is very little clarity in terms of likely future trends in the demand for construction aggregates in Wales. As noted earlier, a decision was therefore made that the RTS should focus on matching future aggregates provision with a combination of historical sales data and the planned requirements for housing construction in Local Development Plans, rather than relying on any kind of detailed econometric forecasting.
- 3.44 Given that the relationship, such as it is, between house construction and aggregate sales is demonstrable at the national level, but not at regional or sub-regional levels, it is logical that figures for future provision should be set at the national level, and subsequently cascaded down to the regions, sub-regions and individual LPAs.

3.45 Following a detailed consideration of several options and permutations, the methodology agreed with the RTS Steering Group<sup>12</sup> was that this should entail four sequential stages, as set out below.

**STAGE 1: National Provision**

- Calculate the overall level of future aggregates provision in Wales at a national level by combining the historical sales average (taking the highest of the 10-year and 3-year averages for each LPA, for the reasons given in para. 3.8 above) with a factor which reflects the planned level of future housing construction activity, compared with that seen over the same 10-year baseline period (for details, see Chapter 5);

**STAGE 2: Regional Split**

- Divide the national figure between North Wales and South Wales, on the basis of the historical sales split between those regions which, as noted in paragraph 24 of MTAN1, has remained reasonably consistent over many years;

**STAGE 3: Sub-Regional and LPA Apportionments**

- Sub-divide the regional figures between a series of seven **sub-regions** (defined for the purpose of this Review<sup>13</sup>) and, *provided that it is feasible to do so*, between each of the constituent Local Planning Authorities (LPAs).
- In most cases, the distribution of apportionments within each sub-region is to be achieved through a combination of quantitative and qualitative judgements, exercised by the RTS Steering Group and facilitated by the appointed consultant. The judgements should aim to reflect the Steering Group’s collective understanding of market requirements (reflecting both historical sales and the distribution of planned housing activity) together with considerations of existing landbanks, the proximity principle and environmental capacity.
- In a few areas, notably where there has been no production of land-won aggregates for many years, with no permitted reserves and zero apportionments, it might sometimes be more appropriate for the RTS apportionments to be subject to more detailed investigation by all of the LPAs within that particular sub-region and to industry responses to future calls for sites within those LPAs. In such cases, LPA apportionments will still be recommended but the possibility of alternative (more sustainable) sub-regional patterns of supply being found through sub-regional collaboration between LPAs and industry will be noted;

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<sup>12</sup> comprising Welsh Government, the two RAWP secretaries, National Resources Wales, the Mineral Products Association, the British Aggregates Association and representatives of one local authority from each Region

<sup>13</sup> The sub-regions were created, at Welsh Government’s suggestion, for the specific purpose of facilitating strategic minerals planning and collaborative approaches between LPAs. They each represent distinctive ‘market areas’ between which there is relatively little movement of aggregates, except for exports to England, and within which detailed, strategic consideration can be given as to the most appropriate patterns of supply.

#### **STAGE 4: Sand & Gravel / Crushed Rock Split, and Allocations**

- Sub-divide each LPA apportionment by aggregate type (sand & gravel or crushed rock), based on the recent historical sales split for that LPA and/or resource availability;
- Then determine the requirements for new allocations within individual LPAs by comparing the apportionment requirements over 22 years (for sand & gravel) or 25 years (for crushed rock)<sup>14</sup> with existing landbanks.

3.46 Further details regarding the implementation of this methodology are presented in Chapter 5, below but first, to inform the qualitative element of Stage 3, it is useful to review the nature and adequacy, or otherwise, of the existing pattern of supply.

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<sup>14</sup> These derive from the minimum landbank requirements of 7 years for sand & gravel and 10 years for crushed rock, being required throughout an *entire* 15-year plan period, as set out in MTAN 1.

## 4. Analysis of the Existing Supply Pattern

### *Introduction*

- 4.1 Planning Policy Wales, paragraph 5.14.1 requires that, in order to provide for society's ongoing needs there should be a steady and adequate supply of construction-related minerals and mineral products. Paragraph 5.14.2 highlights the need to balance this fundamental requirement with the protection of amenity and the environment. This goes to the heart of the RTS process and requires that, as well as balancing supply and demand, consideration is given to the adequacy or otherwise of the existing pattern of supply, from a sustainability perspective. As explained in Chapter 2, this requires at least qualitative assessment of the pattern with respect to both proximity and environmental capacity.
- 4.2 In the original (2008) RTS, proximity was only considered in terms of the 'per capita' demand analysis which, as noted earlier, is difficult to justify. There is little, if any, correlation between aggregate sales and population size. Population density, together with the location of existing urban development, were examined, qualitatively, in the First Review, to provide some indication of the geographical areas where new construction is most likely to be concentrated. Proximity to such areas was seen as one measure of the sustainability of existing quarries, and a desirable factor in the location of new ones - subject, of course, to the availability of resources in those locations and to the consideration of other practical and environmental factors. In the present review, as well as population density, the additional factor of planned housing construction is also being considered.
- 4.3 The concept of environmental capacity was considered, in the original RTSs, only in terms of providing qualitative descriptions for each LPA, based on outputs from the IMAECA analysis. It had no influence at all on the resulting apportionments or allocations (although future working within National Parks was discouraged as a more general matter of Policy - paragraphs 21 and 22 of the former MPPW; and paragraphs. 46, 49, 51, 52 & 53 of MTAN1).
- 4.4 In the course of the First Review, a determined attempt was made to use both the proximity principle and environmental capacity to better effect, in conjunction with an understanding of resource availability and historical supply patterns, in order to enhance, if possible, the spatial distribution of future supply sources. That process is continued in this Review, taking account of the additional information now available on the spatial distribution of planned future housing provision.
- 4.5 In considering such enhancement, it must be remembered that supply patterns are crucially dependent on the availability of suitable resources and on the commercial viability of working them. Minerals can only be worked where they are found. Moreover, they can only be worked on a commercial scale where quarry operators are willing to invest in their extraction, and in the procedures necessary to avoid (or minimise) potential adverse environmental impacts. In most cases, the detailed economic and commercial factors involved for individual sites cannot adequately be assessed at the strategic level represented by the RTS.

- 4.6 It must also be remembered that improved proximity might sometimes be at the expense of reduced environmental capacity; whilst improved capacity might be at the expense of increased transportation distances, with consequential increases in carbon emissions and traffic impacts. The two factors therefore need to be considered in combination.
- 4.7 Consideration also needs to be given to other factors, including the relative merits of extensions to existing quarries as opposed to new ‘greenfield sites’; the need to avoid stifling competition between different operators; and the need to maintain productive capacity – both to maintain a healthy degree of competition between different operators and to ensure that the supply pattern has the necessary resilience to be able to cope with periodic spikes in demand (as, for example, may be associated with major infrastructure projects or other large-scale development initiatives).
- 4.8 These detailed issues can most effectively be dealt with at a local level, however, once the overall strategy has been established. For this reason, the following analysis begins with a consideration of the broad, national and regional picture, with more detail being provided in the sub-Regional analyses presented in Appendices A and B. The key findings are then carried through to the assessment of future apportionments and allocations, in Chapter 5.

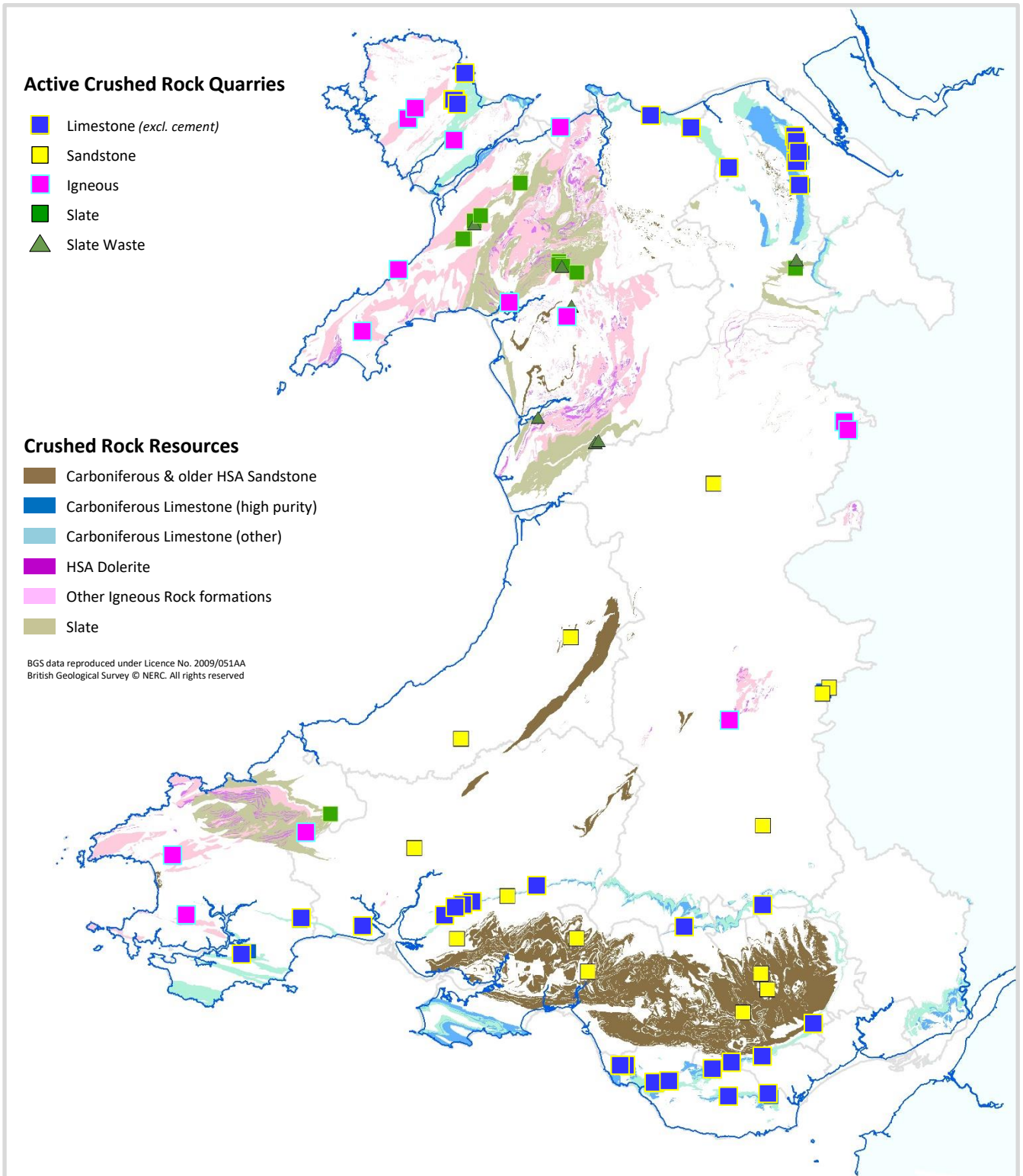
### ***National and Regional Analysis***

#### Distribution of Quarries and Resources

- 4.9 As noted above, the distribution of suitable geological resources is of fundamental importance in understanding the distribution of existing quarries, and in understanding the limitations involved in locating potential new ones. Once again, it is important to stress that minerals can only be worked where they are found.
- 4.10 Figure 4.1, below, shows the distribution of crushed rock quarries in Wales which were active in 2018, together with the outcrops of the key resources. The quarry locations are taken from an updated edition of the BGS ‘Britpits’ database<sup>15</sup>, limiting the selection to those which produce hard rock aggregates, either as a primary product or (in the case of slate waste tips) as a secondary material. Larger scale maps, which show the locations of inactive and dormant, as well as active quarries, are presented in the more detailed analysis contained within the Regional Appendices (A and B).

<sup>15</sup> A 2018 edition of the Britpits database was supplied by the BGS at the outset of this study but was then updated by the RAWP secretaries, particularly in terms of current operational status and ownership.

**Figure 4.1: Active Crushed Rock Aggregate Quarries and Resources in Wales, 2018**



4.11 The resource outcrops on Figure 4.1 are taken directly from the digital dataset produced for the BGS Mineral Resources Map of Wales (Humpage & Bide, 2010), but are limited to those resources which are important for the production of crushed rock aggregates. These include all ‘Category 1’ resources, as identified on the BGS



maps, and some (but not all) 'Category 2' resources. They fall into seven main groups, as follows:

- Carboniferous HSA sandstones (Category 1)
- Pre-Carboniferous HSA sandstones (Category 2)
- High Purity Carboniferous Limestone (Category 1)
- Other Carboniferous Limestone (Category 2)
- HSA dolerites (Category 1)
- Other igneous rock formations (Category 2)
- Slate (Category 2)

4.12 The term 'HSA' refers to 'High Specification Aggregate', which is suitable for use as skid-resistant road surfacing aggregate as defined in the original 'Travers Morgan' report on these materials for the former Department of the Environment (Thompson, Greig & Shaw, 1993). They are characterised by a high Polished Stone Value (PSV $\geq$ 58) in combination with a low Aggregate Abrasion Value (AAV $\leq$ 16) and tend to command a premium price compared with other types of road aggregate. They are also transported over much greater distances in order to meet specification requirements in areas which have no comparable indigenous resources (which includes most of eastern and southern England). HSA aggregates in Wales include certain types of hard sandstone (particularly the Carboniferous 'Pennant' Sandstones of the South Wales coalfield, and some older sandstones - mainly within Powys), and certain types of dolerite (a particular variety of igneous rock) which occurs within various parts of south-west, north-west and mid-Wales.

4.13 It should be noted that some of the extensive sandstone formations within mid-Wales and North Wales that were identified as potential HSA resources within the 1993 Travers Morgan report have since been refined by the most recent and more detailed BGS resource mapping, such that only parts of those resources are now identified as potential sources of HSA material on a commercial scale.

4.14 The usual caveat should be added that not all of the outcrops, of any of the rock types or formations listed at para. 4.11, above, will necessarily be suitable for commercial quarrying. This is because all geological materials are inherently variable, from one part of their outcrop to another. Moreover, the commercial viability of extraction is also influenced by a large number of other practical issues including the local extent of the deposit, land ownership, access, and distance from market, as well as planning and environmental constraints.

4.15 Above all, it must be emphasised that Figure 4.1 (and Figure 4.2 below) displays the extent of potential **resources** and not **permitted reserves**. Resources are geological materials, including rock formations and naturally occurring sand & gravel deposits, which have the *potential* to be used for a particular purpose (in this case as construction aggregates). Reserves, in the broadest sense, are those parts of a resource which are *known* to be suitable for this purpose (usually as a result of detailed ground investigations and laboratory testing) and permitted reserves are

those which have valid planning permission for the winning and working of the materials in question.

- 4.16 Excluded from Figure 4.1 are a range of weaker sandstones and limestones, including some 'Category 2' resources, which are not currently exploited as sources of crushed rock aggregate on anything other than an extremely local scale (e.g. for use on farms etc.), and where this is most unlikely to change in future, because of their inherent unsuitability for more commercial applications. Such resources include all Devonian sandstones and all post-Carboniferous sandstones and limestones. Whilst many of these have been identified by the BGS as being worthy of safeguarding within Local Development Plans (Wrighton & Humpage, 2012), they do not represent practical alternatives to the resources listed above, in terms of their ability to meet the same commercial specifications and are therefore not considered further here.
- 4.17 Figure 4.2, below, provides a similar map of the distribution of land-based sand & gravel pits, together with the corresponding potential resources. The latter are once again taken largely from the BGS Mineral Resources Map of Wales and include a wide range of sediments which have potential as sources of natural aggregate. The same caveats apply as for the crushed rock resources noted above.
- 4.18 Figure 4.2 also shows, within NW Wales and SE Wales, more specific potential resource blocks which were identified in more detailed studies carried out for the National Assembly for Wales (Thompson et al., 2000; University of Liverpool, 2003). These are not necessarily the only potential worthwhile resources, but they are the most rigorously assessed, within the areas concerned.
- 4.19 Figure 4.3, which follows, shows the areas which are within an illustrative 20km radius of one or more currently active crushed rock quarries; and Figure 4.4 provides a similar illustration in respect of both land-based sand & gravel quarries and ports which receive marine-dredged aggregates (principally sand).
- 4.20 In most cases, the economic radius of distribution from these locations is considerably greater than 20km: typically up to 50km for 'ordinary' graded aggregate or further in the case of value-added products (e.g. ready-mixed concrete and asphalt materials) that are often produced at remote depots for onward distribution, and much further still in the case of High Specification Aggregates or High Purity limestone.
- 4.21 The diagrams merely illustrate that the existing pattern of supply within Wales already conforms reasonably well to the Proximity Principle: very few parts of the country (those shown in black on Figure 4.3) are more than 20km from a source of crushed rock aggregate and many of those which are further away fall within 20km of either a land-based sand & gravel pit or a wharf which imports marine-dredged aggregates. Elsewhere, the distances are more than 20km but rarely more than 30km, and in most cases these are remote rural areas which are unlikely to generate significant levels of demand.

**Figure 4.2: Land-based Sand & Gravel Pits and Resources in Wales, 2018**

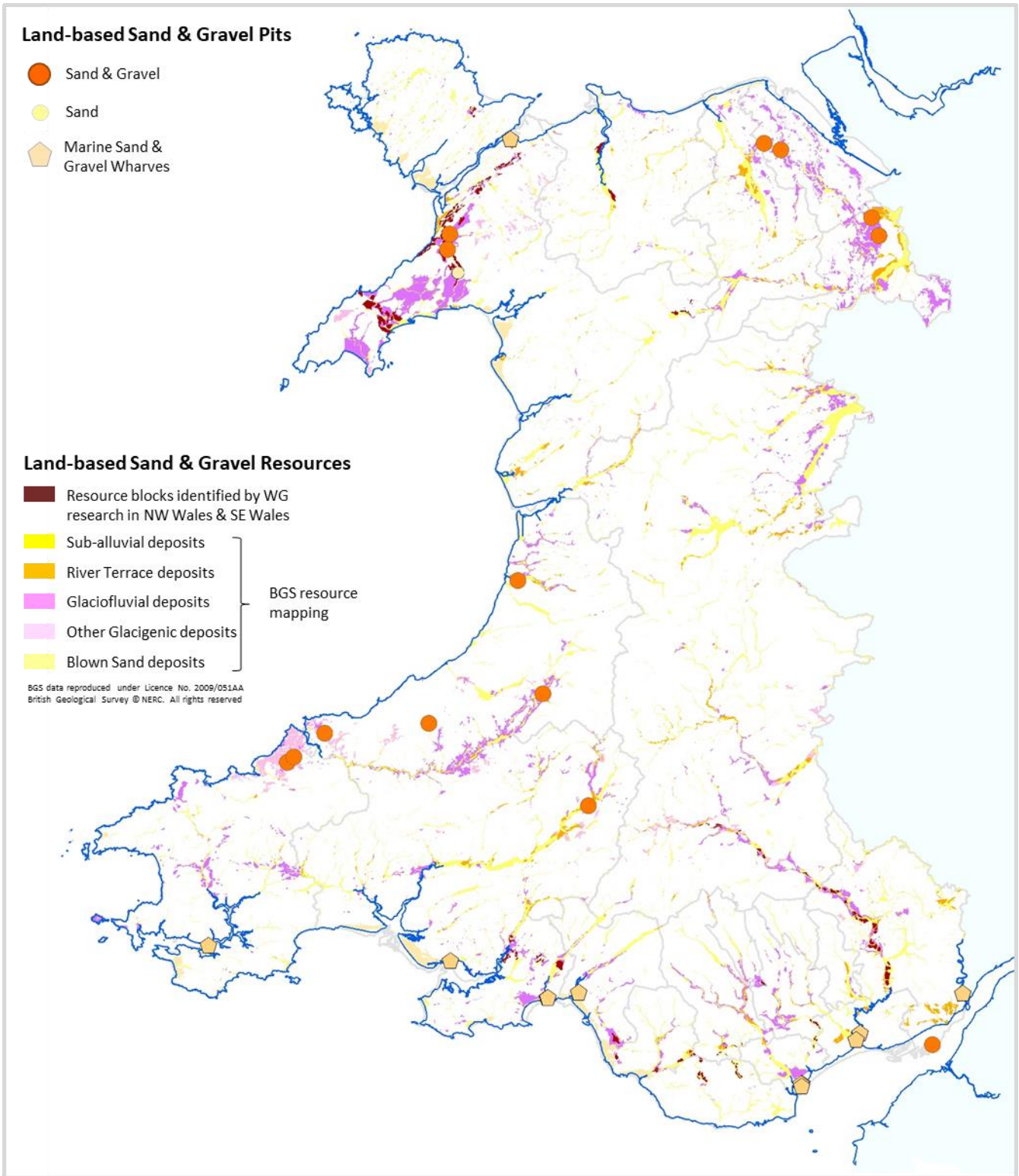
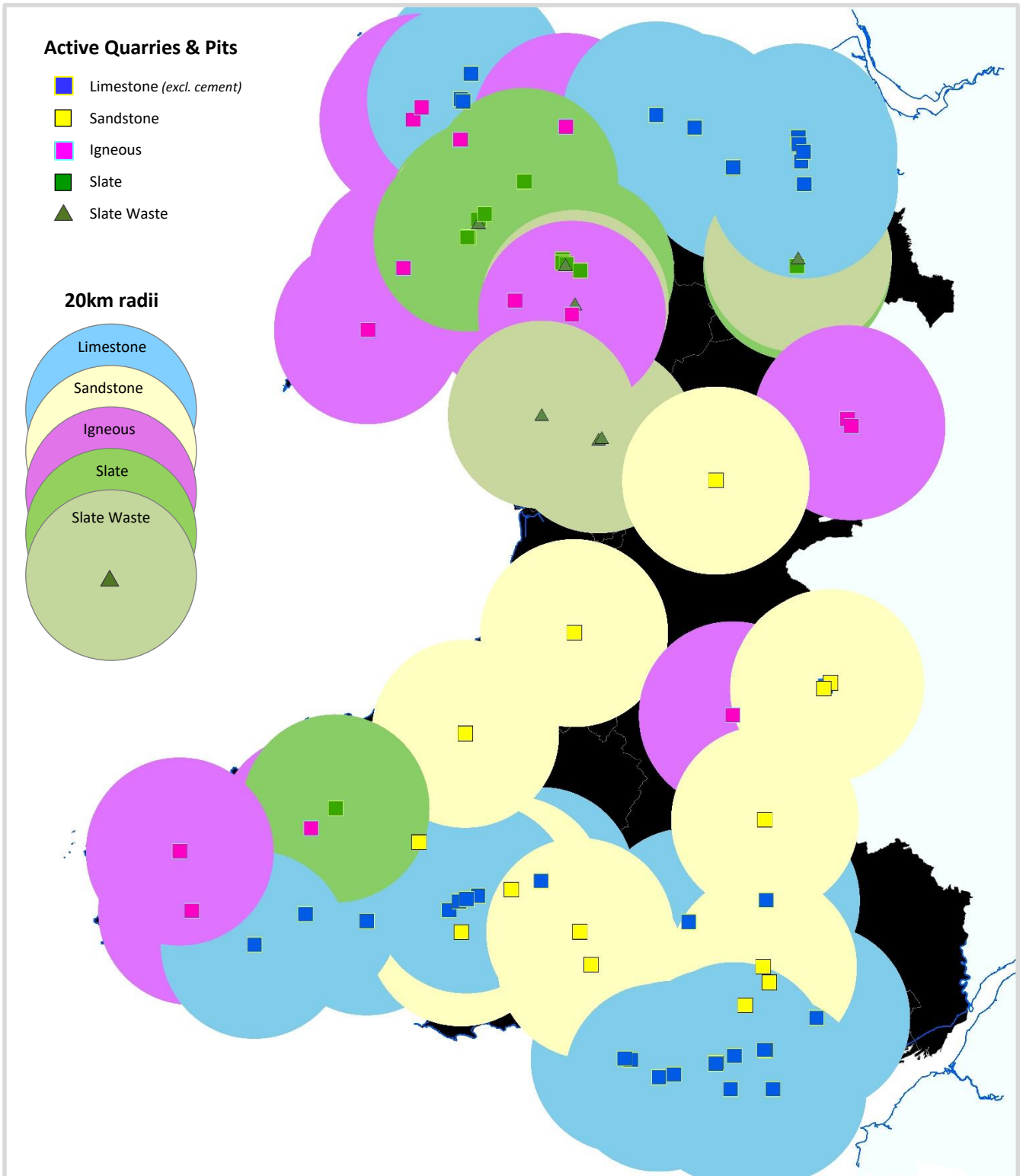
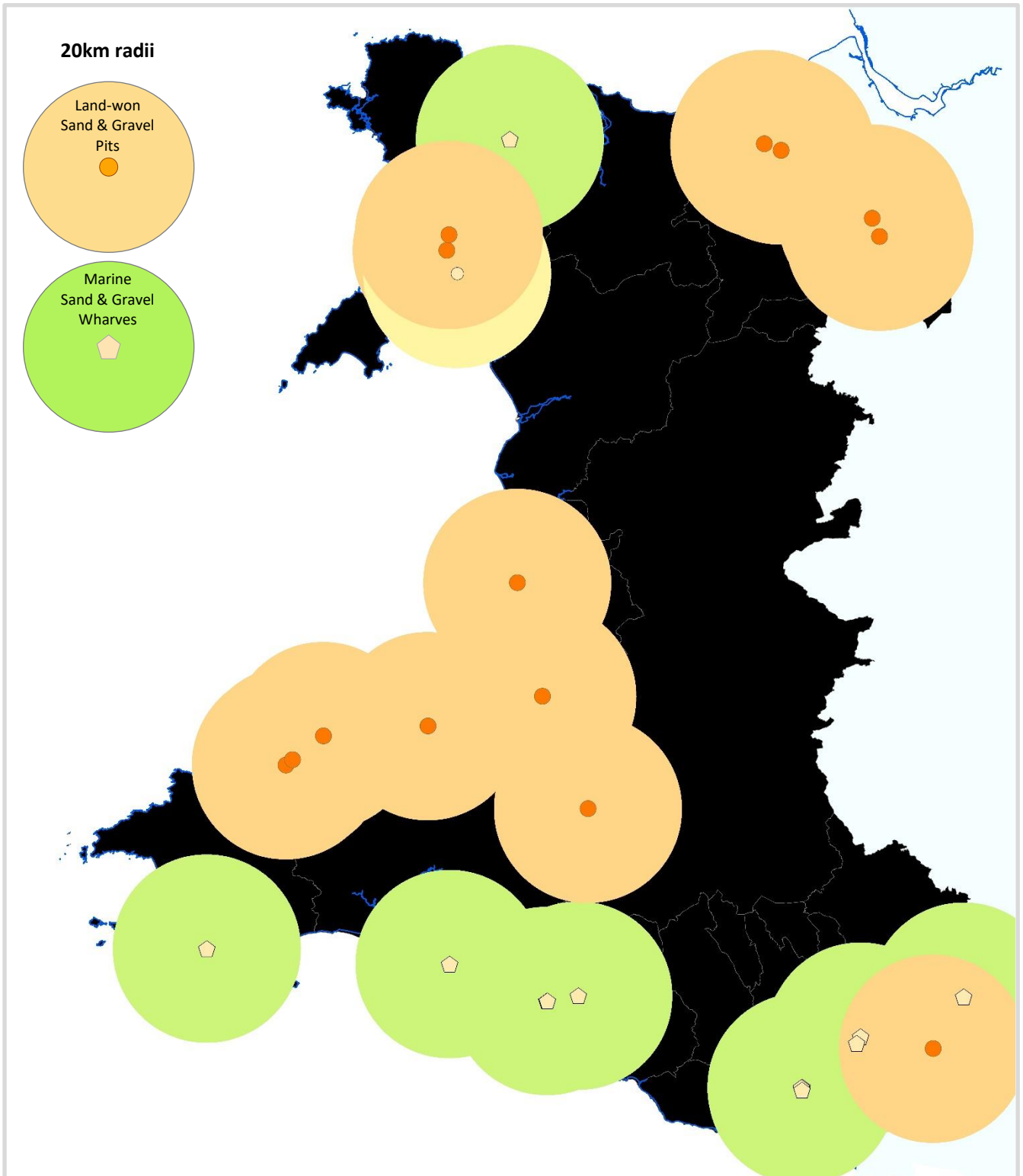


Figure 4.3: illustrative 20km radii from all active crushed rock quarries in Wales, 2018.



**Figure 4.4: illustrative 20km radii from all active sand & gravel pits & wharves in Wales, 2018.**



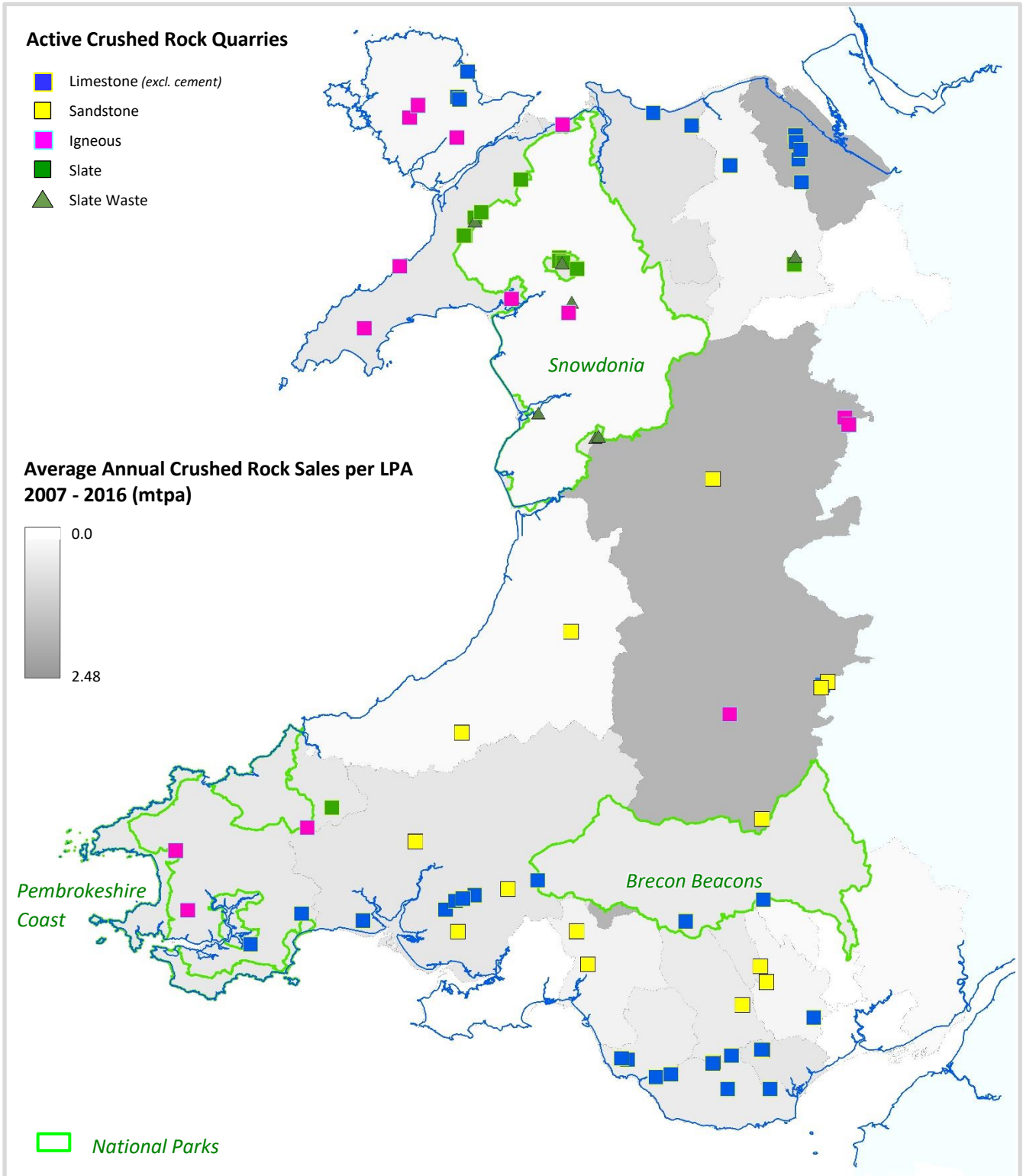
4.22 Figure 4.5, below, shows the distribution of crushed rock quarries in relation to the scale of crushed rock aggregate production, as measured by average historical sales figures for each LPA over the baseline period (2007-2016). The shading corresponds

to the figures given in Tables 5.4 and 5.6 in Chapter 5<sup>16</sup>. It is emphasised that this illustrates variations in production, not demand, and therefore includes both domestic consumption and exports to adjoining areas, including England. Figure 4.6 then provides a similar map for land-based sand & gravel production, displaying the data from Tables 5.3 and 5.5.

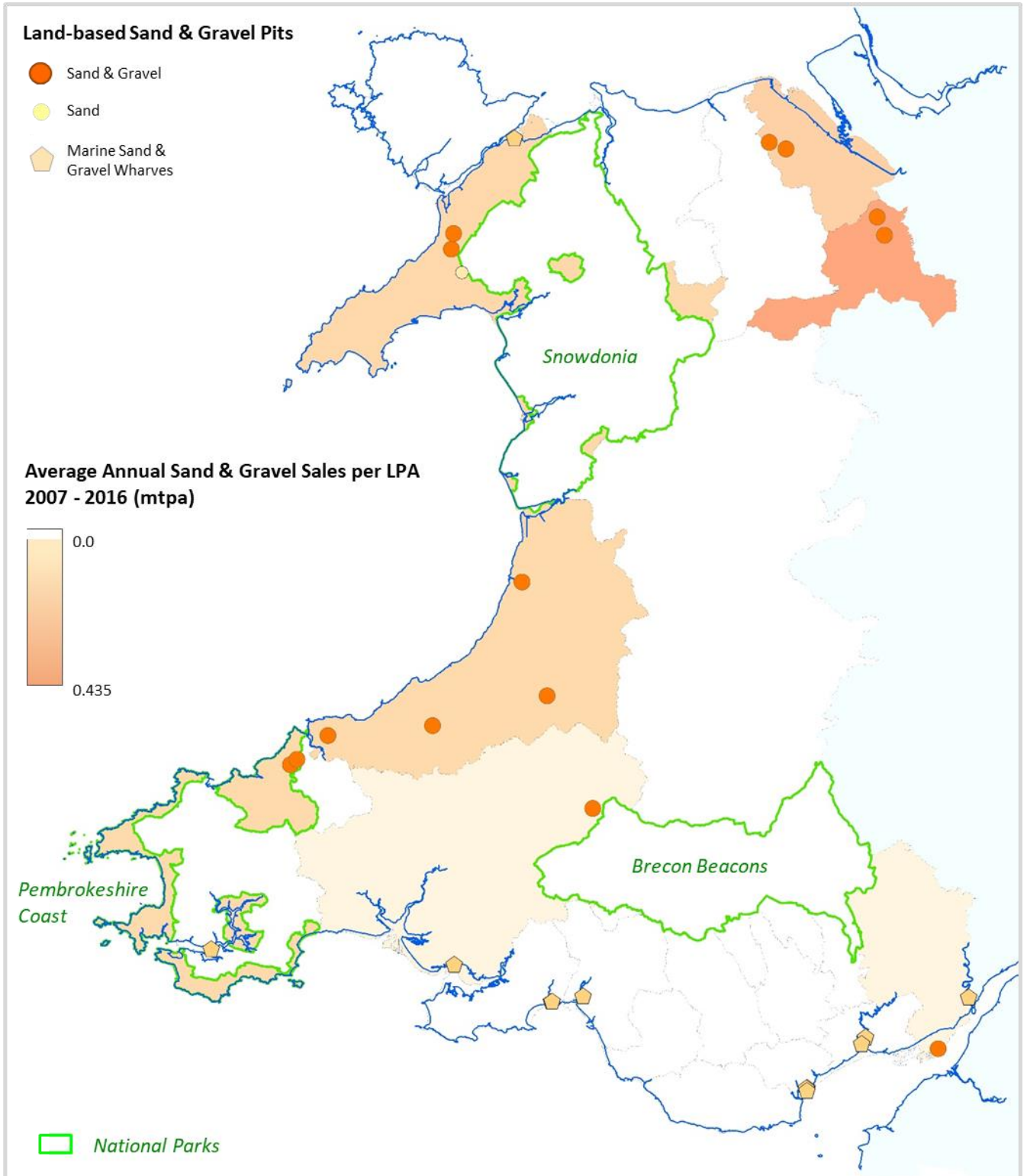
- 4.23 The focus of production for crushed rock is clearly seen, from Figure 4.5, to be in North-East Wales - particularly Flintshire (which is where most of the exporting Carboniferous Limestone quarries are located); and in Powys, where a number of sandstone and igneous rock quarries supply HSA material to England - particularly to adjoining parts of the West Midlands. In the rest of South Wales the picture is distorted by the much smaller size of many of the individual unitary authorities, particularly in the south-east, where the totals for each LPA are less than for the much larger county of Powys, even though overall production within SE Wales is double the total for Powys.
- 4.24 Historical crushed rock sales in South Wales have been concentrated within the Carmarthenshire, Bridgend, Vale of Glamorgan, Rhondda Cynon Taf and Cardiff LPAs (which is where most of the larger Carboniferous Limestone quarries in South Wales are located), and in the adjoining LPAs of Caerphilly and Neath Port Talbot, where additional HSA sandstone quarries are also located. Whereas much of the crushed rock production within NE Wales is supplied to the neighbouring parts of North West England, particularly Merseyside, most if not all of the limestone production in South East Wales appears to be utilised locally, within the producing areas, and within the adjoining LPAs of Swansea and Neath Port Talbot, to the west, and those of Merthyr Tydfil, Caerphilly and the 'Former Gwent' authorities to the east. Although Carboniferous Limestone resources do exist in these adjoining areas, they are either less extensive and/or more heavily constrained (see Appendix B for more detailed analysis).
- 4.25 The fact that little or none of the limestone from South Wales is exported further east, into England, is evidenced by the fact that additional Carboniferous Limestone from the Forest of Dean in Gloucestershire is currently being imported into the former Gwent area to make up for what would otherwise be an overall shortfall of supply. Although SE Wales has significant exports of crushed rock to England, most if not all of those exports are of HSA from the Pennant Sandstone formations of the South Wales Coalfield.
- 4.26 Overall, the pattern of crushed rock aggregate production outlined above relates largely to the availability of resources, the location of established supply units and the proximity of these to the main areas of construction activity and/or to major transport routes such as M4 corridor. Further analysis of the supply pattern, including the relationships between quarry locations, resources, markets, major designations and environmental capacity, is provided in paragraphs 4.30 *et seq.*, below, and in the two Regional Appendices.

<sup>16</sup> The exception being Snowdonia National Park, which is combined with Conwy in Table 3.1, for confidentiality reasons, but which in fact had very limited production over the baseline period, from a single site.

**Figure 4.5: Spatial Distribution of Crushed Rock Production within each LPA, based on Average Sales 2007 - 2016, with locations of Active Crushed Rock Aggregate Quarries (2018)**



**Figure 4.6: Spatial Distribution of Land-won Sand & Gravel production within each LPA, based on Average Sales 2007 - 2016, with locations of Sand & Gravel Pits (2018)**



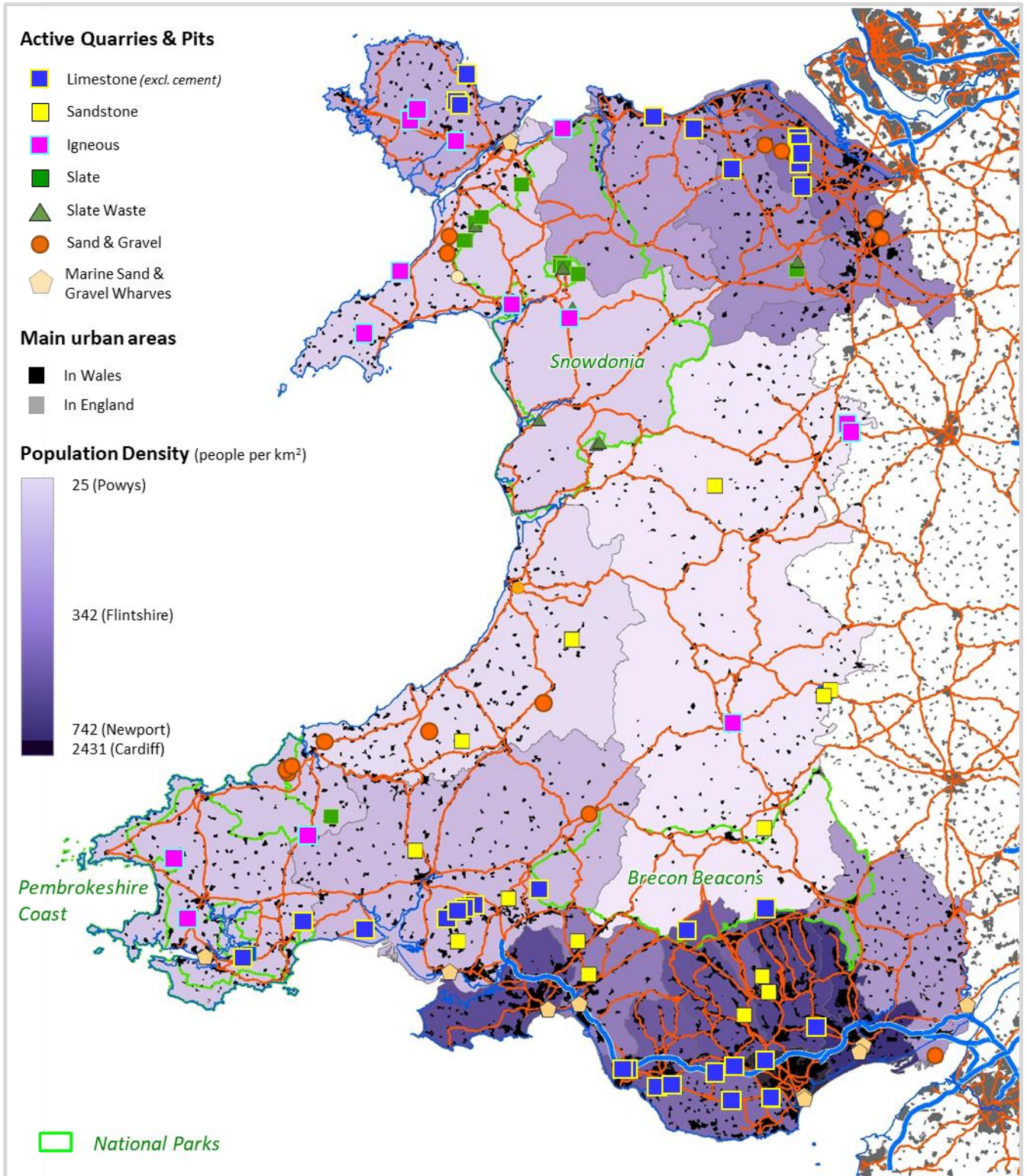


- 4.27 Looking to the future, any undue reliance on historical supply data would inevitably reinforce and perpetuate the same patterns of supply. More careful consideration is therefore needed where such reliance would unnecessarily perpetuate adverse environmental effects or unjustified inequalities in the balance of supply between neighbouring authorities (see also para. 4.27, above); or where undue reliance might otherwise be placed on the continued availability of supplies from an adjoining LPA or country (e.g. imports from Gloucestershire into SE Wales). In addition, any imposed change to the existing supply pattern may, in some cases, either necessitate working less suitable, thinner or otherwise less viable resources, where these exist, or (in some cases at least) may entail increased transportation distances, with consequential increases in carbon emissions and traffic impacts. All of these issues are explored in more detail in the sub-regional analyses within Appendices A and B.
- 4.28 In the case of sand & gravel production, as illustrated in Figure 4.6, the picture is greatly distorted by the reliance of South East Wales, in particular, on marine-dredged aggregates from the Bristol Channel and the Severn Estuary. South West Wales is less dependent on marine aggregates and has a small number of active land-based sites. Powys is too far removed from the coast to be influenced to any significant degree by marine aggregates, but still has only one very small land-based sand & gravel site currently in operation. It is reliant instead on crushed rock material, despite the apparent resources of natural sand & gravel within the upper reaches of the Severn, Wye and Usk valleys. In North Wales, there are, once again, apparently plentiful resources of natural sand & gravel in Gwynedd (as indicated in both BGS and Liverpool University mapping) but the supply pattern is dominated by one major quarry within Wrexham and (to a much smaller extent) by two further units within Wrexham and two or three others in Flintshire. Further details are given in the Regional Appendices.
- 4.29 Overall, in South Wales and much of North Wales, the relative lack of land-based sand & gravel production is influenced to a very large extent by environmental and landscape concerns, as well as by the relative ease of availability of alternative materials (marine aggregates, crushed rock and slate, including slate waste).

#### Comparison of the Supply Pattern with Population Density and Transport Links

- 4.30 Figure 4.7, below, shows the distribution of all currently active quarries and pits throughout Wales in relation to variations in population density by local authority area. It also shows urban areas, A-roads and motorways. Additional local roads, not shown on this map, will also be utilised close to individual quarries, distribution depots or customer locations. Together, the areas of high population density and the main urban areas provide a good indication of where construction activity, as a whole, is most likely to be concentrated, but the locations of major transport routes, such as the A55 in North Wales, and the M4 corridor in South Wales have important influences on export distribution. The map does not show railways, which are generally not used for aggregate distribution, though they are important for a few of the quarries in the South Wales coalfield area and along the North Wales coast.

**Figure 4.7: LPA Population Densities (2010) and main urban areas, as approximations for the overall pattern of demand for construction aggregates, with motorways, A-roads, national landscape designations and locations of all active quarries & pits (2018)**



- 4.31 In North Wales, the highest population density occurs within Flintshire and Wrexham, coinciding with the highest levels of crushed rock and sand & gravel output, respectively, within that region (see figures 5.5 and 4.6, above). The road network in these areas also provides ease of access for exports into the conurbations of North West England, including the Wirral, Liverpool and Warrington. The main apparent anomaly here is the absence of crushed rock production within Wrexham. Although Carboniferous Limestone resources do exist in the western part of this authority, they fall almost entirely within the Clwydian Range & Dee Valley AONB. It will generally not be appropriate for new allocations to be identified within such areas, unless there are no viable alternatives within neighbouring Flintshire or Denbighshire. This is discussed at greater length in Appendix A, as is the need to maintain sand & gravel supplies within North West Wales by developing further resources in Gwynedd.
- 4.32 In South Wales, there is some coincidence between the areas of high population density and urban areas, on the one hand, and the distribution of crushed rock sales and quarries, on the other, but the relationship is less clear than in the north and the need for adjustments to the future supply pattern is, in some cases, more compelling. In particular, the areas of Newport, Torfaen, Blaenau Gwent and Caerphilly have higher population densities than those of the Vale of Glamorgan, Bridgend and RCT, but it is in the latter areas where most of the Carboniferous Limestone outcrops and quarries are located. Similarly, Swansea has a high population density but no active quarries or pits, relying instead on neighbouring Carmarthenshire for most of its limestone supplies, on Neath Port Talbot for supplies of road surfacing aggregate, and on marine dredged sources landed at Swansea Wharf for building sand. As with Wrexham in North Wales, Swansea does have indigenous resources of Carboniferous Limestone but again these are almost entirely within an AONB designation – that of the Gower Peninsula.
- 4.33 As noted in the First Review, the distribution of crushed rock quarries in this area as a whole is therefore not ideally matched with the main areas of demand, suggesting that there may need to be some adjustment in terms of future apportionments, on the grounds of proximity. This, however, needs to be examined in more detail and balanced against both environmental capacity and commercial factors – not least including the availability or otherwise of workable resources within and outside national landscape designations. Further commentary on this is given in Appendix B.
- 4.34 In mid Wales, there is a marked contrast between the very low population density of Powys and the high level of demand placed upon that County, in terms of crushed rock sales (compare Fig 4.7 with Fig 4.4). This, as noted earlier, is primarily due to a number of large quarries within Powys which export High Specification Aggregates by road to markets in England. Taking that into account, together with the distribution of these important resources, these quarries are clearly well-placed in terms of proximity to the relevant markets and transport routes.

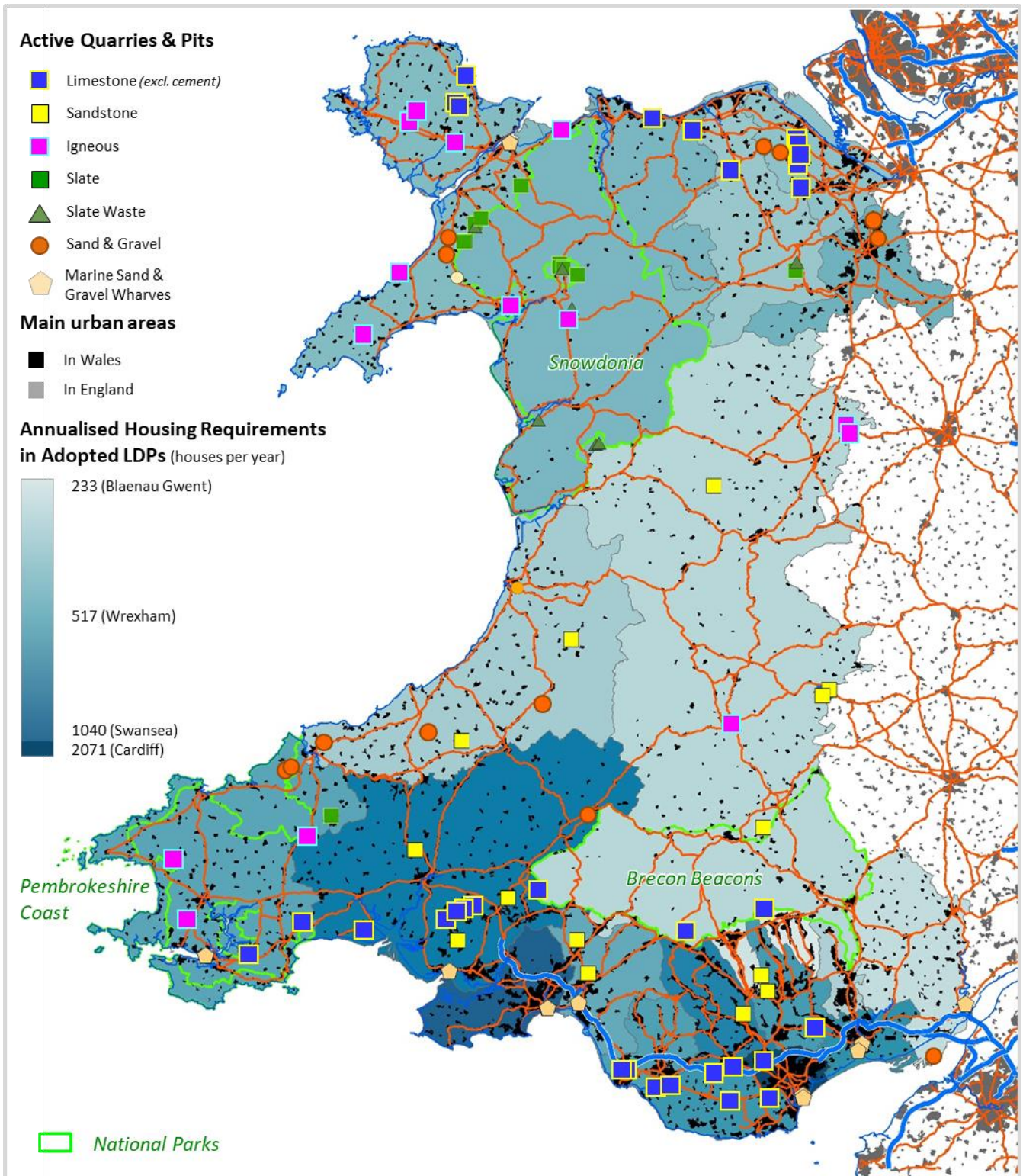
Comparison of the Supply Pattern with Planned Development

- 4.35 Consideration also needs to be given to the distribution of supply sources in relation to that of the planned distribution of new housing provision since, as explained in Chapter 3, this is likely to have an important influence on the location of future aggregate consumption. Figure 4.8, below, therefore illustrates the distribution of active quarries in relation to the annualised housing requirement set out in Local Development Plans.
- 4.36 In this case, the indicated pattern of consumption is somewhat closer to the pattern of supply, than is the case when looking at population density. In South East Wales, especially, the housing requirement figures are relatively modest in Blaenau Gwent, Torfaen and Monmouthshire, which are served by only a single quarry, but the anomaly is still seen in Swansea, which has the second highest housing requirement figures, after Cardiff.

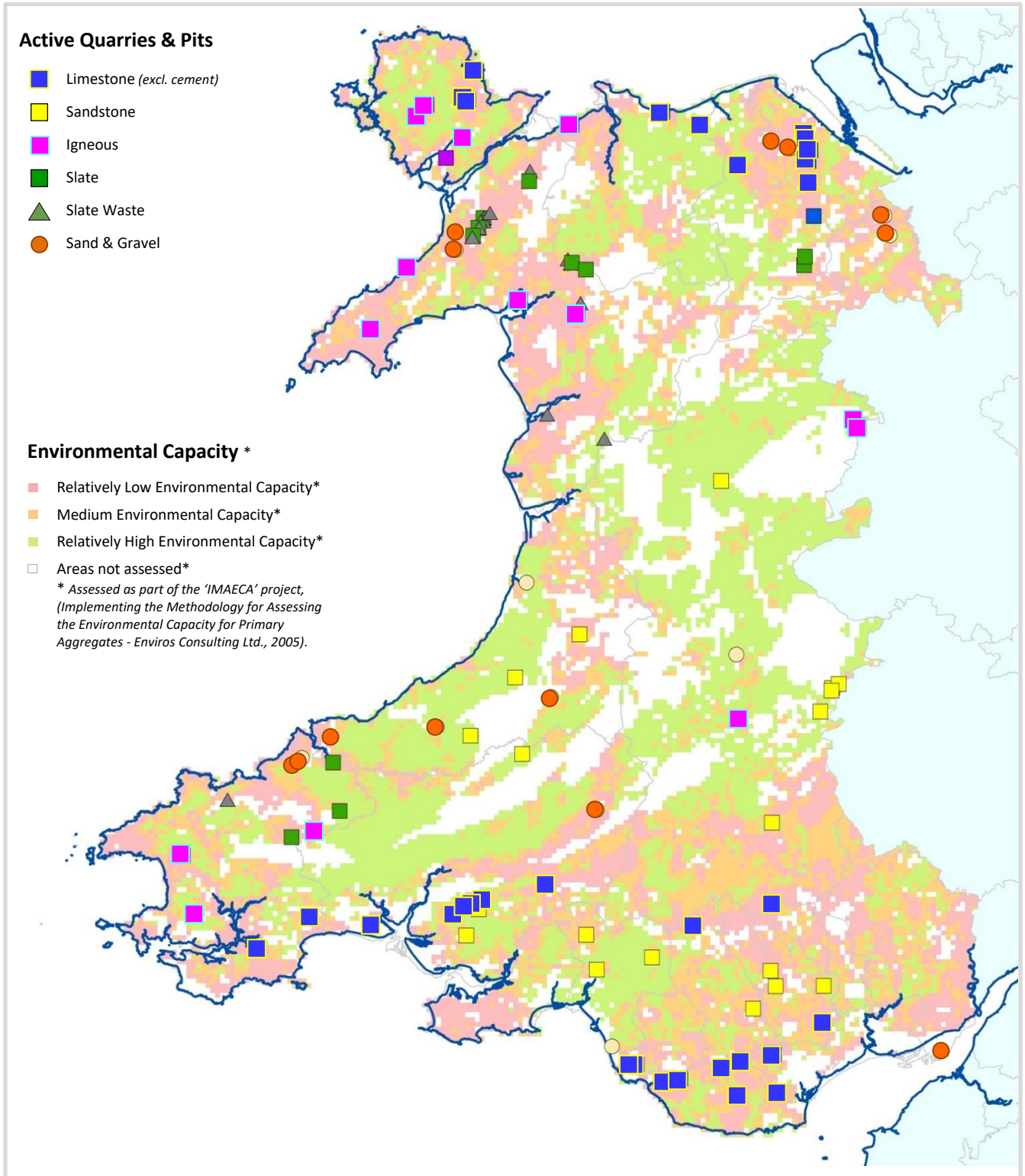
Comparison with Environmental Capacity

- 4.37 Figure 4.9, below, compares the distribution of active quarries with the spatial variations in Environmental Capacity across most (but not all) of Wales, as indicated by the 'combined scores' from the IMAECA Geographic Information System tool developed by Enviros Consulting Ltd. (2005). As explained more fully in paragraphs 2.14 et seq., above, the tool provides values, relative to arbitrary thresholds between the three coloured categories, for each 1km square which was assessed by the IMAECA project. The areas assessed were identified on the basis of whether or not aggregate resources were present within all or part of each square. Areas which were considered not to contain such resources were not assessed, which is why many parts of the country are left blank.
- 4.38 It should be noted that, whilst the GIS tool allows separate results to be shown for different resource categories, those categories do not entirely match with the current BGS mineral resource maps and the resource outlines are therefore quite different. It is therefore more useful to look at the overall picture, as shown in Figure 4.9 (and, at a slightly larger scale but at the same level of detail, in the various maps which accompany the sub-Regional analysis in Appendices A and B).
- 4.39 It must be emphasised that the IMAECA results are intended only to provide a very broad indication of the capacity of different areas to accept the environmental impacts of additional quarrying activity. They are necessarily generalised and are specifically *not* intended to take the place of conventional 'sieve-mapping' within individual Local Authorities, where more detailed constraint maps can be used and site-specific issues can be examined to determine the relative pros and cons of different factors.

**Figure 4.8: Annualised Planned (LDP) Housing Requirements in LPAs and National Parks, as partial indicators of the pattern of demand for construction aggregates, with motorways, A-roads, and locations of all active quarries & pits (2018)**



**Figure 4.9: Environmental Capacity Assessment (combined scores for each km<sup>2</sup>), as assessed by the IMAECA project, with locations of all active quarries & pits (2018)**



4.40 The IMAECA results have also been criticised for the fact that the presence of an existing quarry is treated, in the IMAECA analysis, as a factor which reduces the capacity for further quarrying in that area. Whilst there might be some justification for this, in terms of seeking to minimise cumulative impacts, it conflicts with the

widely-held notion that well-designed extensions to existing quarries are likely to be more acceptable, at least in terms of public perception, than the introduction of quarrying to previously undisturbed 'greenfield' sites.

- 4.41 Bearing all of that in mind, the IMAECA results nevertheless provide a useful starting point for comparing environmental capacity issues with other factors (including resource availability, proximity and commercial viability) in areas where the historical supply pattern is thought to be in need of improvement, from a sustainability point of view. This is examined further in the Regional Appendices (A and B), the key findings of which are summarised at the end of this chapter.

### ***Sub-Regional Analysis of Supply Patterns***

- 4.42 More detailed, sub-regional analyses of the inter-relationships between each of the various factors outlined above were taken into account during Stage 3 of the apportionment process, as summarised in Chapter 5, below. They are described more fully in the Regional Appendices for North Wales (Appendix A) and South Wales (Appendix B).

## 5. Assessment of Apportionments and Allocations

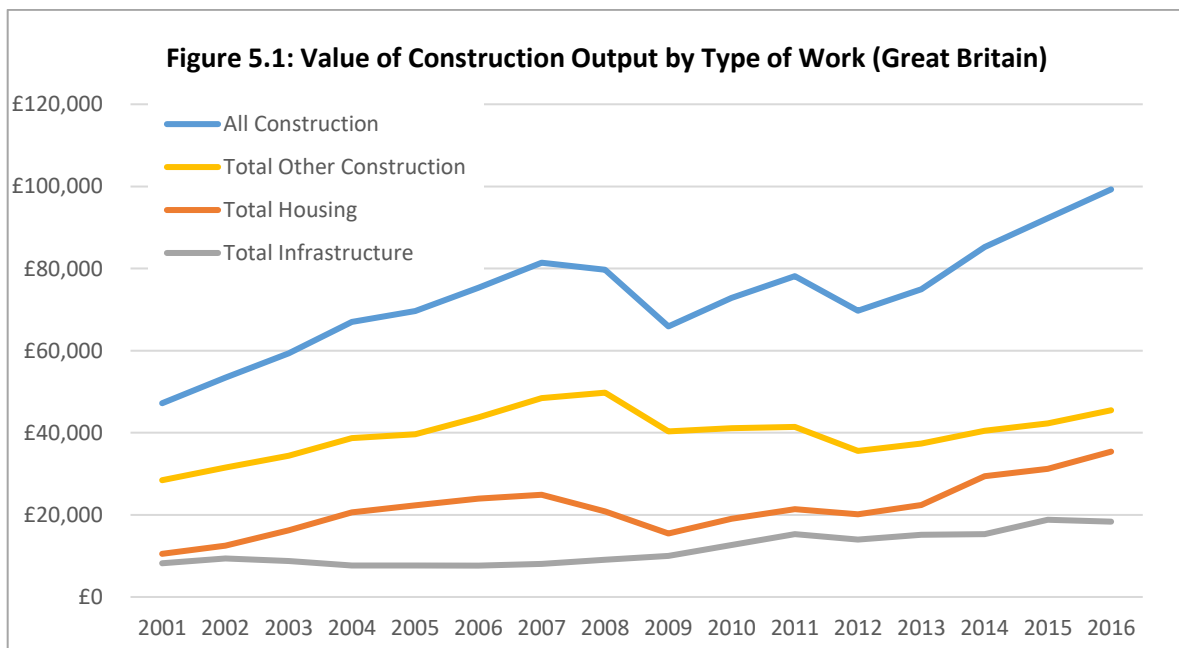
5.1 The foregoing review of the existing supply pattern feeds into the overall methodology for determining apportionments and allocations for future working, as set out in Chapter 3. This Chapter implements the four sequential stages of that methodology.

### **STAGE 1: Setting the National Level for Future Aggregates Provision**

5.2 The agreed methodology begins by establishing the overall (national) level of future provision for all land-won primary aggregates in Wales. This is required to be assessed by combining historical sales data (using the highest of 10-year and 3-year averages, as explained in para. 3.8, above, and totalling 15.557mt) with a factor which reflects the planned level of future construction activity, compared with that seen over the same 10-year baseline period.

5.3 Housing is an important element of such activity and one for which quantified requirements and levels of provision are made in local development plans, in a way which can readily be related to aggregate consumption. Clearly, however, housing accounts for only part of the overall level of aggregate consumption. Before deciding on how best to use the housing figures, it is therefore useful to consider the overall breakdown of construction activity. Statistical information on this is not readily available for Wales, but a useful insight can be gained by using data for the whole of Great Britain, which is published annually by the Office of National Statistics (ONS).

5.4 Figure 5.1 and Table 5.1, below, derived from the ONS Construction Statistics Annual 2017, show how housing accounts for just under 30% on average of all new construction work, in terms of value, varying over time from 22% to 36%.



SOURCE: Combined public & private sector data from Table 2.4c in the ONS Construction Statistics Annual, 2017.  
<https://www.ons.gov.uk/businessindustryandtrade/constructionindustry/datasets/constructionstatisticsannualtables>



**Table 5.1: Percentage value of construction output by type of work, Great Britain.** (SOURCE: as for Figure 5.1)

YEAR	2001	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16
Housing %	22%	23%	27%	31%	32%	32%	31%	26%	24%	26%	27%	29%	30%	34%	34%	36%
Infrastructure %	17%	18%	15%	11%	11%	10%	10%	11%	15%	17%	20%	20%	20%	18%	20%	18%
'Other' %	60%	59%	58%	58%	57%	58%	59%	62%	61%	56%	53%	51%	50%	48%	46%	46%

- 5.5 Major infrastructure projects can have a very substantial effect on the demand for construction aggregates within particular areas or regions. Whilst this needs to be reflected in the planning for future aggregates provision, the difficulty lies in the fact that such projects are rarely planned to a reliable delivery timescale and are susceptible to major political and investment decisions which are beyond the scope of the planning system (as demonstrated, for example, in the case of the proposed Swansea Tidal Lagoon, the Wylfa Newydd nuclear power station and the M4 Newport relief road). There is also considerable difficulty in quantifying the requirements for individual projects in terms of the need for construction aggregate. Overall, infrastructure accounts for between 10% and 20% of total construction value, averaging just under 16%. Its influence on overall demand is therefore likely to be much less than that of housing, and far more difficult to quantify.
- 5.6 The majority (more than half, on average) of total spending is associated with 'other' types of construction activity. These include schools & universities, offices, entertainment, hospitals, factories, warehouses and a variety of miscellaneous work. Whilst all of these will influence the overall demand for construction materials, in many cases the materials used are likely to be dominated by steel and glass, rather than aggregates. Moreover, whilst much of the building work is recognised in Local Development Plans, in terms of allocations for employment, hospitals, schools, etc., there is no mechanism for quantifying the aggregate requirements involved or for comparing planned activity with historical data.
- 5.7 In recognition of these various observations, and taking account of the close correlation between house building and aggregates provision; the fact that housing accounts for around 30% of all construction activity (at a GB level); and the fact that provision for house building is set to double (at a national level); it would seem justified to allow for a doubling of that 30% element of the overall supply. In other words, in order to ensure that adequate provision is made for the future supply of aggregates to support planned housing construction, the national level of overall provision should be set at 130% of the historical sales figure. The latter, as noted above, has been calculated as 15.557 mtpa. Applying a 30% uplift to this figure thus gives a **headline, national figure for future primary, land-won aggregates provision is calculated to be 20.224 mtpa.**
- 5.8 This figure is only marginally higher than the actual recorded sales total of 20.11mt for the year 2007 at the start of the baseline period, immediately prior to the economic recession, so is demonstrably not an unreasonable figure.

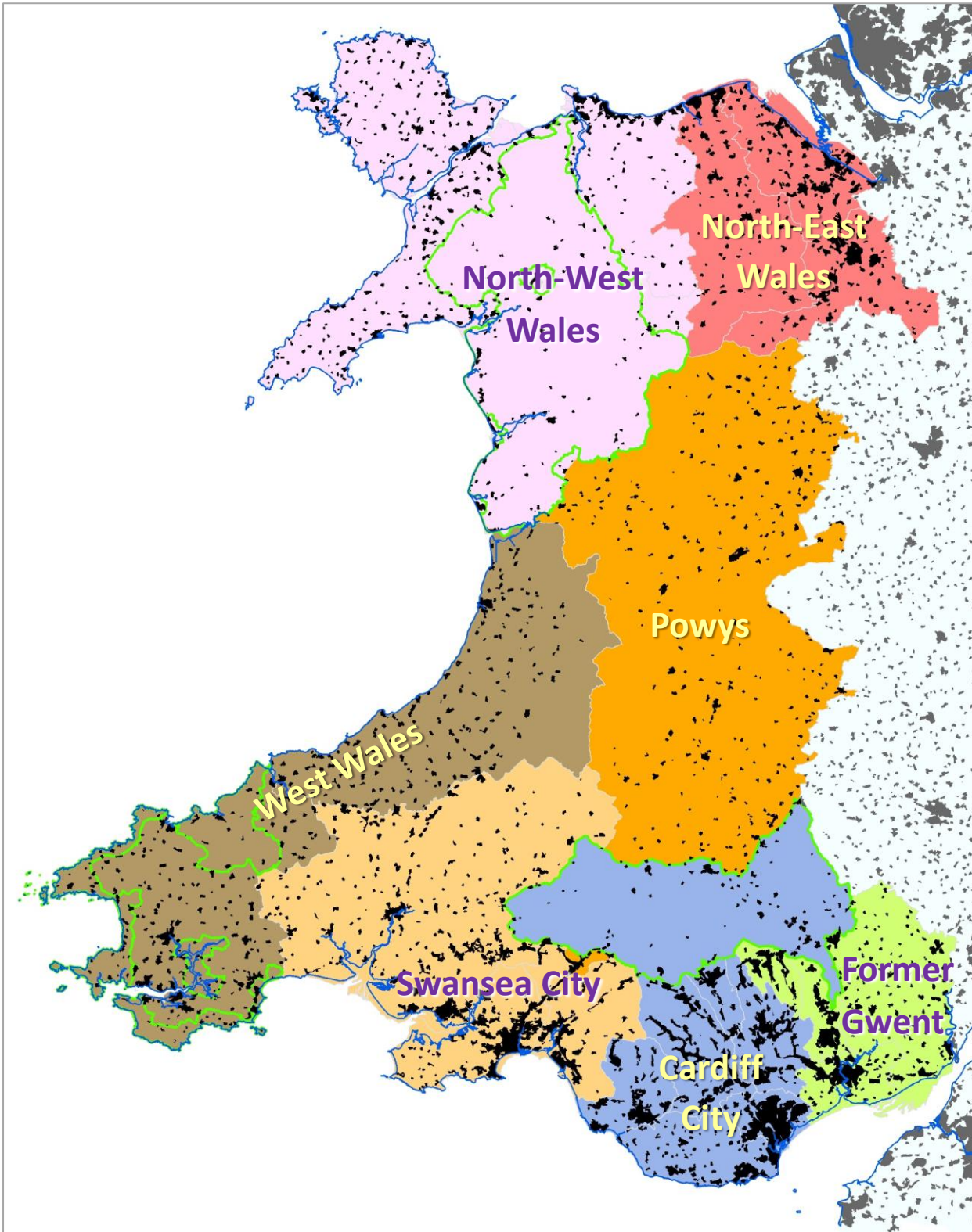
### ***STAGE 2: Calculation of the Regional Split between North Wales and South Wales***

- 5.9 Table 3.1, in Chapter 3, shows how the regional split of primary aggregate sales between North Wales and South Wales has varied only slightly over the baseline period, ranging from 34/66% at one extreme to 41/59% at the other. Over the period as a whole, the average split (calculated from the more detailed and updated figures in Tables 5.2 to 5.5, below) has been **38.26% / 61.74%**
- 5.10 Applying this ratio to the national total from para. 5.7 above gives the following headline apportionments for each of the two regions:
- **North Wales primary land-won aggregates: 7.738 mtpa**
  - **South Wales primary land-won aggregates: 12.486 mtpa**

### ***STAGE 3: Calculation of Sub-Regional and LPA Apportionments***

- 5.11 Stage 3 of the apportionment process requires that the regional figures are apportioned between a series of seven **sub-regions**, created for the purpose of the RTS and, *provided that it is feasible to do so*, between each of the constituent Local Planning Authorities (LPAs).
- 5.12 The sub-regions were created, at Welsh Government's suggestion, for the specific purpose of facilitating strategic minerals planning and collaborative approaches between LPAs. They each represent distinctive 'market areas' between which there is relatively little movement of aggregates, except for exports to England, and within which detailed, strategic consideration can be given as to the most appropriate patterns of supply.
- 5.13 The sub-regions, as listed below, are illustrated in Figure 5.2, which also shows (in black), the main urban areas and (in shades of grey) the neighbouring authorities in England.
- **North West Wales** (comprising Anglesey, Gwynedd, Conwy and the Snowdonia National Park), and
  - **North East Wales** (comprising Denbighshire, Flintshire & Wrexham);
  - **Powys**;
  - **West Wales** (Pembrokeshire, Pembrokeshire Coast National Park and Ceredigion);
  - **Swansea City-Sub-Region** (Swansea, Neath Port Talbot and Carmarthenshire);
  - **Cardiff City Sub-Region** (Cardiff, RCT, Merthyr Tydfil, Caerphilly, Bridgend, the Vale of Glamorgan and the Brecon Beacons National Park); and
  - **'Former Gwent'** (Blaenau Gwent, Torfaen, Newport and Monmouthshire).

**Figure 5.2: Sub-Regional Groupings of Local Planning Authorities in Wales, as determined for the purposes of land-won primary aggregate apportionment**



5.14 The sub-regional groupings, thus defined, provide the basis for dividing the Regional Apportionment figures (from para 5.10, above), between the various groups of LPAs and, where feasible, between individual LPAs. The methodology for doing this, as

agreed by the RTS Steering Group, was based on a combination of quantitative calculations and qualitative judgements, as described below.

- 5.15 Dealing first with the **quantitative data**, it was agreed that the pattern of apportionments should reflect, not only the pattern of historical sales (as had been used in the First Review) but also, where necessary, the pattern of house construction achieved over the baseline period<sup>17</sup>. This would have the added benefit of introducing changes to the supply pattern so that it becomes more aligned with the spatial pattern of observed (and likely future) demand, thereby addressing some of the inequalities that are reflected in the existing (historical) pattern of supply.
- 5.16 Two sets of ‘theoretical’ figures were therefore produced, one relating to historical sales (“Option A”) and one relating to the housing figures (“Option B”). The term ‘theoretical’ is used here to indicate that these are the figures that would result from using only one or the other of the two datasets.
- 5.17 The historical sales data for Option A are derived from Table 3.2, above, using the highest of the 10-year and 3-year averages, for each LPA. In Tables 5.2 and 5.3 below, those figures are then expressed as percentages of the Regional totals and applied to the appropriate Regional figures from Stage 2, above, to obtain the Option A figures shown on the left hand side of the tables.
- 5.18 For Option B, the housing completions data for each LPA, taken from Table 3.3, were initially expressed as percentages of the Regional housing completion totals, in a similar way to the analysis of sales data for Option A. However, applying those percentages to the Regional apportionments from Stage 2 resulted in theoretical LPA figures which were felt to be too far removed from the ‘reality’ of the historical supply pattern. Instead, the process was therefore taken down to the sub-regional level: the housing figures were expressed as percentages of the sub-regional housing totals and applied to the sub-regional apportionment totals obtained from Option A, to give the Option B figures shown in columns 5 to 7 of Tables 5.2 and 5.3. For the purpose of this exercise (only), the two sub-regions in south-east Wales (i.e. Cardiff and Former Gwent) were combined. This was to address the fact that Former Gwent, as a whole, was considered, by the Steering Group, to have been making a relatively limited contribution to the overall supply pattern for many years.
- 5.19 Option A has the advantage of reflecting the existing distribution of supply sources (quarries) and is therefore realistic in terms of ‘deliverability’ but carries the disadvantage of perpetuating the historical supply pattern and the various inequalities contained therein. It represents the preferred option in areas where the historical supply pattern appears to provide a sensible balance between the availability of resources and the location of demand, but requires modification elsewhere.

<sup>17</sup> Whilst future housing requirement figures have been used to influence the overall quantum of future supply, in Stage 1 of the Methodology, for Stage 3 it was considered that the housing completion figures, over the baseline period covered by this review, would provide a more reliable metric for the demonstrable spatial pattern of this element of demand.

**Table 5.2: Assessed Sub-Regional and LPA Apportionments, North Wales.**

Local Planning Authority	OPTION A			OPTION B			Preferred Annualised Apportionments (mtpa) <small>[By default = Option A, but modified in some cases (red figures) to allow for Option B or qualitative observations as noted in column to right]</small>	Qualitative Observations
	highest of 10-yr and 3yr Ave. Aggregate Sales (total) (mtpa)	% share of Regional total	Resulting Annualised Apportionments for all Land-Won Primary Aggregates <sup>1</sup> (mtpa)	Annualised House Completions over the baseline period (2007 – 2016)	% share of Sub-Regional total	Resulting Annualised Apportionments for all Land-Won Primary Aggregates <sup>2</sup> (mtpa)		
N. WALES TOTAL (from Stage 2)	<b>7.738</b>							
<b>NE Wales Sub-Region</b>	<b>4.047</b>	<b>65.75%</b>	<b>5.088</b>	<b>749.0</b>	<b>100.00%</b>	<b>5.088</b>	<b>5.088</b>	The existing supply pattern here (Option A) provides an appropriate balance between market forces (including substantial exports) and the availability of unconstrained resources. Flintshire has much higher aggregate sales than Denbighshire, despite similar housing requirements. This reflects local market distortion by exports to NW England. The slight modification shown within the preferred apportionment figures is to make the best use of existing landbanks and thereby reduce future allocation requirements overall. Wrexham supplies only sand & gravel as its limestone resources are largely constrained by the AONB.  The existing supply pattern in NW Wales is well balanced with the distribution of planned housing provision and is unaffected by exports. Option A should therefore be used. Supplies are sourced primarily from outside the National Park and AONBs and are well distributed between the main producing areas of Conwy and Gwynedd, with more limited supplies from Anglesey to local markets.
Denbighshire	0.329	5.35%	0.414	156.2	20.85%	1.061	0.860	
Flintshire	3.204	52.06%	4.028	288.6	38.53%	1.960	3.582	
Wrexham	0.514	8.35%	0.646	304.2	40.61%	2.066	0.646	
<b>NW Wales Sub-Region</b>	<b>2.108</b>	<b>34.25%</b>	<b>2.650</b>	<b>969</b>	<b>100.00%</b>	<b>2.650</b>	<b>2.650</b>	
Conwy + Snowdonia NP	0.955	15.52%	1.201	178.6	39.26%	1.041	1.201	
Gwynedd	0.898	14.59%	1.129	170.4	36.60%	0.970	1.129	
Isle of Anglesey	0.255	4.14%	0.321	109.6	24.14%	0.640	0.321	

Notes:

- The annualised apportionments for Option A were obtained by applying the percentages in column 3 (representing each LPA's share of Regional historic sales totals) by the Regional Apportionment total from Stage 2 (as shown at the top of the table).
- The annualised apportionments for Option B were obtained by applying the percentages in column 6 (representing each LPA's share of sub-regional housing requirement totals) by the corresponding Sub-regional Apportionment totals from column 4.

**Table 5.3: Assessed Sub-Regional and LPA Apportionments, South Wales.**

Local Planning Authority <i>(see Table 5.2 for footnotes)</i>	OPTION A			OPTION B			Preferred Annualised Apportionments (mtpa) <small>[By default = Option A, but modified in some cases (red figures) to allow for Option B or qualitative observations as noted in column to right]</small>	Qualitative Observations
	highest of 10-yr and 3yr Ave. Aggregate Sales (total) (mtpa)	% share of Regional total	Resulting Annualised Apportionments for all Land-Won Primary Aggregates <sup>1</sup> (mtpa)	Annualised House Completions over the baseline period (2007 – 2016)	% share of Sub-Regional total	Resulting Annualised Apportionments for all Land-Won Primary Aggregates <sup>2</sup> (mtpa)		
S. WALES TOTAL (from Stage 2)	<b>12.486</b>							
<b>West Wales Sub-Region</b>	<b>1.140</b>	<b>12.13%</b>	<b>1.514</b>	<b>366.1</b>	<b>100.00%</b>	<b>1.514</b>	<b>1.514</b>	Some adjustment is required to increase the provision from Ceredigion whilst reducing that from the Pembrokeshire Coast National Park but leaving the total unchanged. Ceredigion currently supplies aggregates in proportion to its share of planned housing at a regional level, but not at the sub-regional level. Provision from this LPA should therefore be increased (to an average of Options A and B), with a corresponding reduction from the National Park.
Ceredigion	0.300	3.19%	0.398	126.1	34.44%	0.521	0.460	
Pembrokeshire	0.510	5.42%	0.677	240	65.56%	0.992	0.677	
Pembrokeshire Coast NP	0.330	3.51%	0.438				0.377	
<b>Swansea Sub-Region</b>	<b>1.292</b>	<b>13.74%</b>	<b>1.716</b>	<b>1,311.5</b>	<b>100.00%</b>	<b>1.716</b>	<b>1.716</b>	The Option A figure for Carmarthenshire should be retained, with the remainder of production (mostly HSA - high PSV sandstone) being divided between Swansea and NPT. Option B addresses the current zero apportionment for Swansea, but realistic opportunities for resource development in Swansea relate only to high PSV sandstone which, at present, is supplied primarily from NPT. Limestone is supplied only from Carmarthenshire, which therefore needs to retain its apportionment from Option A in full, with the balance of apportionments (for sandstone) being shared between Swansea and NPT. The figures shown here for those two LPAs assume an equal split between them. If a different balance is preferred, this would need to be agreed by those LPAs as part of their Statement of Sub-Regional Collaboration.
Carmarthenshire	0.832	8.85%	1.105	517.8	39.48%	0.677	1.105	
Swansea	0.000	0.00%	0.000	519.4	39.60%	0.680	0.305	
Neath Port Talbot	0.460	4.89%	0.611	274.3	20.91%	0.359	0.305	
<b>Powys Sub-Region</b>	<b>2.650</b>	<b>28.19%</b>	<b>3.519</b>	<b>191.7</b>	<b>100.00%</b>	<b>3.519</b>	<b>3.519</b>	Option A provides the most reliable reflection of future demand for Powys, being dominated, as it is, by exports of HSA (high PSV) Aggregates to England. That option is therefore preferred without modification
Powys	2.650	28.19%	3.519	191.7	100.00%	3.519	3.519	

Continued ...

.....Table 5.3 continued	OPTION A			OPTION B			Preferred Annualised Apportionments (mtpa) <small>[By default = Option A, but modified in some cases (red figures) to allow for Option B or qualitative observations as noted in column to right]</small>	Qualitative Observations	
Local Planning Authority <small>(see Table 5.2 for footnotes)</small>	highest of 10-yr and 3yr Ave. Aggregate Sales (total) (mtpa)	% share of Regional total	Resulting Annualised Apportionments for all Land-Won Primary Aggregates <sup>1</sup> (mtpa)	Annualised House Completions over the baseline period (2007 – 2016)	% share of Sub-Regional total <small>(or of combined SE Wales total, for Cardiff &amp; Former Gwent)</small>	Resulting Annualised Apportionments for all Land-Won Primary Aggregates <sup>2</sup> (mtpa)			
<b>Cardiff City Sub-Region</b>	<b>4.070</b>	<b>43.29%</b>	<b>5.405</b>	<b>2,316.9</b>	<b>66.48%</b>	<b>3.814</b>	<b>4.609</b>	ALL of the apportionments within the combined SE Wales area (i.e. the Cardiff sub-region and Former Gwent) need to be adjusted to reflect the fact that Former Gwent, <u>as a whole</u> , has not been supplying its fair share of aggregates for many years (this being largely but not only due to the lack of production in both Torfaen and Newport). Option B addresses this issue by calculating requirements based on % shares of planned housing demand in both sub-regions combined. However, those figures, on their own, do not take account of resource availability. <b>The preferred figures are therefore the average of Options A and B.</b> In the case of BBNP and Merthyr, where that calculation provides only a combined figure (= 0.567mtpa), it is suggested that Merthyr should retain the Option A figure of 0.199mtpa, with the balance of 0.368mtpa being assigned to the National Park.	
Brecon Beacons NP	0.540	5.74%	0.717	133.2	3.82%	0.219	0.368		
Merthyr Tydfil	0.150	1.60%	0.199				0.199		
Bridgend	0.600	6.38%	0.797	365	10.47%	0.601	0.699		
Rhondda Cynon Taf	0.670	7.13%	0.890	373.9	10.73%	0.615	0.753		
Vale of Glamorgan	0.660	7.02%	0.876	284.3	8.16%	0.468	0.672		
Caerphilly	0.390	4.15%	0.518	335.2	9.62%	0.552	0.535		
Cardiff	1.060	11.27%	1.408	825.3	23.68%	1.359	1.383		
<b>Former Gwent Sub-Region</b>	<b>0.250</b>	<b>2.66%</b>	<b>0.332</b>	<b>1,168.2</b>	<b>33.52%</b>	<b>1.923</b>	<b>1.128</b>		The figures shown for the Former Gwent LPAs are simply averages of Options A and B. Torfaen and Newport currently have zero apportionments and the feasibility of being able to make future provision in those areas needs to be examined in greater detail by those Authorities. If the balance of supply needs to depart from these figures (but without reducing the sub-regional total), this would need to be agreed by all four LPAs as part of their Statement of Sub-Regional Collaboration.
Blaenau Gwent	0.180	1.91%	0.239	99.1	2.84%	0.163	0.201		
Monmouthshire	0.070	0.74%	0.093	228.6	6.56%	0.376	0.235		
Newport	0.000	0.00%	0.000	527.5	15.14%	0.868	0.434		
Torfaen	0.000	0.00%	0.000	313	8.98%	0.515	0.258		

- 5.20 Option B, based purely on the distribution of planned housing activity, theoretically provides a way of changing the pattern of supply to one that is more equitable, and in line with the distribution of a very significant element of demand (i.e. house building and associated other construction), but takes no account of the spatial pattern of geological resources or existing quarries. On its own, this would be wholly inappropriate as a future supply strategy as it would not be deliverable within the timescale required, since it requires supplies to be provided from areas with no existing quarries. It does, however, provide a useful indication of the ‘direction of travel’ that may be needed in order to improve the existing pattern of supply from a sustainability perspective.
- 5.21 In practice, where the supply pattern was considered to be in need of adjustment to achieve an improved balance, the two sets of figures were combined (by taking the average of Options A and B, for each LPA). In each of the tables, the **preferred option** (usually either option A or the average of A and B) are shown in the eighth column. In a few cases, however, further adjustments were required on the basis of more nuanced **qualitative judgements**, as described in the right-hand column of the tables.
- 5.22 Decisions regarding which option to select for each LPA, and qualitative judgements regarding other factors which needed to be taken into account, were made by the RTS Steering Group through a process of round-table discussion. Importantly, the analysis and discussions were focused on each of the self-contained sub-regional areas in turn, so as to achieve a preferred balance of supply within each of those areas, whilst not disturbing the broader-scale pattern of supply within each Region as a whole. The only exception to this was in South-East Wales where, as noted earlier, the two sub-regions (Cardiff and Former Gwent) were combined for the quantitative stage of analysis.
- 5.23 The summaries given in the right hand column of Tables 5.2 and 5.3 describe the main reasoning for selecting the preferred distribution of apportionments within each sub-region. Fuller explanations, including details of the consideration given to the distribution of resources, practicalities of mineral extraction, major constraints (National Parks and AONBs), environmental capacity and the proximity principle, are given within the Regional Appendices.

#### ***STAGE 4: Sand & Gravel / Crushed Rock Split and Allocations for Future Working***

- 5.24 The final stage of the RTS process relates to the separation of each LPA’s apportionment figure by aggregate type (i.e. natural sand & gravel, and crushed rock), and then comparison of the total requirements for each of those, over the relevant Plan periods, with the current stock of permitted reserves, in order to determine whether or not new allocations are required to meet any shortfalls. Tables 5.4 to 5.7 below present the data and calculations involved.



**Table 5.4: Calculation of Allocations Required for Land-won Sand & Gravel Aggregates – North Wales**

Local Planning Authority	Overall 'Preferred' Apportionment (S&G & CR) <sup>1</sup> (mt)	Historic proportion supplied from sand & gravel sources <sup>2</sup>	New Annualised Apportionment for sand & gravel <sup>3</sup> (mt)	Total Apportionment Required over 22 years	Existing permitted reserves at end of 2016 in mt <sup>4,5</sup>	Existing landbank <sup>6</sup> (years)	Surplus or Shortfall (-) of Existing Permitted Reserves (mt)	Minimum Allocation needed to meet Required Provision <sup>7</sup> (mt)	Additional reserves at Dormant sites, 2016 <sup>4</sup> (mt)
Denbighshire	0.860	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Flintshire	3.582	6.23%	0.223	4.912	1.369	6.1	-3.543	3.543	0.5
Wrexham	0.646	100.00%	0.646	14.217	12.652	19.6	-1.565	1.565	0
Conwy + Snowdonia NP	1.201	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Gwynedd	1.129	15.44%	0.174	3.834	1.175	6.7	-2.659	2.659	0
Isle of Anglesey	0.321	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
<b>Sub-totals, North Wales</b>	<b>7.738</b>	<b>13.40%</b>	<b>1.044</b>	<b>22.963</b>	<b>15.196</b>		<b>-7.767</b>	<b>7.767</b>	<b>0.5</b>

## NOTES:

1 Taken from Tables 5.2 (North Wales) or Table 5.3 (South Wales)

2 Based on RAWP data over the 10-year baseline period (2007 – 2016)

3 Assumes that the historic proportion is maintained, with the exception of the Pembrokeshire Coast National Park where a slight adjustment has been made to avoid the need for allocations.

4 Data provided by the RAWP secretary for December 2016

5 Permitted reserves exclude those at dormant sites.

6 Landbanks = stock of permitted reserves at active and inactive sites, expressed in terms of the annualised apportionment

7 Allocations required = calculated shortfall, if any.

8. The sand & gravel allocations needed for Ceredigion could potentially be provided, in part, from resources in neighbouring parts of Carmarthenshire, despite being in a different sub-region.

Where allocation requirements are shown these are the minimum amounts required to meet the RTS requirements. In many cases an application for an individual new permission will exceed these amounts, in the interests of economic viability. Such applications should not be rejected purely on the grounds of exceeding the minimum requirements shown here. In some cases, the suggested allocations may already have been partially or entirely fulfilled, either by new permissions granted since December 2016, or by allocations that have already been identified in LDPs. Further details are given in the Regional Appendices.

**Table 5.5: Calculation of Allocations Required for Land-won Sand & Gravel Aggregates – South Wales.**

Local Planning Authority <small>*see Table 5.4 for footnotes</small>	Overall 'Preferred' Apportionment (S&G & CR) <sup>1</sup> (mt)	Historic proportion supplied from sand & gravel sources <sup>2</sup>	New Annualised Apportionment for sand & gravel <sup>3</sup> (mt)	Total Apportionment Required over 22 years	Existing permitted reserves at end of 2016 in mt <sup>4,5</sup>	Existing landbank <sup>6</sup> (years)	Surplus or Shortfall (-) of Existing Permitted Reserves (mt)	Minimum Allocation needed to meet Required Provision <sup>7</sup> (mt)	Additional reserves at Dormant sites, 2016 <sup>4</sup> (mt)
Ceredigion	0.460	36.67%	0.188	4.136	0.510	2.7	-3.626	3.626	0
Pembrokeshire	0.677	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Pembrokeshire Coast NP	0.377	36.36%	0.118	2.600	2.600	22	0.000	0.000	0
Carmarthenshire	1.105	0.24%	0.003	0.058	0.100	37.7	0.042	See note 8 below Table 5.4	0.35
Swansea	0.305	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Neath Port Talbot	0.305	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Powys	3.519	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Brecon Beacons NP	0.368	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Merthyr Tydfil	0.199	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Bridgend	0.699	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Rhondda Cynon Taf	0.753	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Vale of Glamorgan	0.672	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Caerphilly	0.535	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Cardiff	1.383	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Blaenau Gwent	0.201	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Monmouthshire	0.235	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Newport	0.434	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Torfaen	0.258	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
<b>Sub-totals, South Wales</b>	<b>12.485</b>	<b>2.96%</b>	<b>0.309</b>	<b>6.784</b>	<b>3.21</b>			<b>3.626</b>	<b>0.35</b>
<b>TOTALS Wales</b>	<b>20.224</b>	<b>6.95%</b>	<b>1.353</b>	<b>29.758</b>	<b>18.406</b>			<b>11.394</b>	<b>0.85</b>

**Table 5.6: Calculation of Allocations Required for Crushed Rock Aggregates – North Wales.**

Local Planning Authority	Overall 'Preferred' Apportionment (S&G & CR) <sup>1</sup> (mt)	Historic proportion supplied from crushed rock sources <sup>2</sup>	New Annualised Apportionment for crushed rock <sup>3</sup> (mt)	Total Apportionment Required over 25 years	Existing permitted reserves at end of 2016 in mt <sup>4,5</sup>	Existing landbank <sup>6</sup> (years)	Surplus or Shortfall (-) of Existing Permitted Reserves (mt)	Minimum Allocation needed to meet Required Provision <sup>7</sup> (mt)	Additional reserves at Dormant sites, 2016 <sup>4</sup> (mt)
Denbighshire	0.860	100.00%	0.860	21.500	21.710	25.2	0.210	0.000	0
Flintshire	3.582	93.77%	3.359	83.968	48.040	14.3	-35.928	35.928	1.41
Wrexham	0.646	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Conwy + Snowdonia NP	1.201	100.00%	1.201	30.016	62.500	52.1	32.484	0.000	0.25
Gwynedd	1.129	84.56%	0.955	23.867	28.540	29.9	4.673	0.000	0
Isle of Anglesey	0.321	100.00%	0.321	8.015	14.400	44.9	6.385	0.000	0
<b>Sub-totals, North Wales</b>	<b>7.738</b>	<b>86.60%</b>	<b>6.695</b>	<b>167.366</b>	<b>175.19</b>			<b>35.928</b>	<b>1.66</b>

## NOTES:

1 Taken from Tables 5.2 (North Wales) or Table 5.3 (South Wales)

2 Based on RAWP data over the 10-year baseline period (2007 – 2016)

3 Assumes that the historic proportion is maintained, with the exception of the Pembrokeshire Coast National Park where a slight adjustment has been made to avoid the need for allocations.

4 Data provided by the RAWP secretary for December 2016

5 Permitted reserves exclude those at dormant sites.

6 Landbanks = stock of permitted reserves at active and inactive sites, expressed in terms of the annualised apportionment

7 Allocations required = calculated shortfall, if any.

Where allocation requirements are shown these are the minimum amounts required to meet the RTS requirements. In many cases an application for an individual new permission will exceed these amounts, in the interests of economic viability. Such applications should not be rejected purely on the grounds of exceeding the minimum requirements shown here. In some cases, the suggested allocations may already have been partially or entirely fulfilled, either by new permissions granted since 2016, or by allocations that have already been identified in LDPs. Further details are given in the Regional Appendices.

**Table 5.7: Calculation of Allocations Required for Crushed Rock Aggregates – South Wales.**

Local Planning Authority <small>*see Table 5.6 for footnotes</small>	Overall 'Preferred' Apportionment (S&G & CR) <sup>1</sup> (mt)	Historic proportion supplied from crushed rock sources <sup>2</sup>	New Annualised Apportionment for crushed rock <sup>3</sup> (mt)	Total Apportionment Required over 25 years	Existing permitted reserves at end of 2016 in mt <sup>4,5</sup>	Existing landbank <sup>6</sup> (years)	Surplus or Shortfall (-) of Existing Permitted Reserves (mt)	Minimum Allocation needed to meet Required Provision <sup>7</sup> (mt)	Additional reserves at Dormant sites, 2016 <sup>4</sup> (mt)
Ceredigion	0.460	63.33%	0.272	6.798	5.370	19.7	-1.428	1.428	0
Pembrokeshire	0.677	100.00%	0.677	16.932	16.720	24.7	-0.212	0.212	0
Pembrokeshire Coast NP	0.377	63.64%	0.259	6.475	10.370	40.0	3.895	0.000	0
Carmarthenshire	1.105	99.76%	1.102	27.556	59.900	54.3	32.344	0.000	13.82
Swansea	0.305	n/a	0.305	7.636	0.000	0.0	-7.636	7.636	0
Neath Port Talbot	0.305	100.00%	0.305	7.636	16.480	54.0	8.844	0.000	0
Powys	3.519	100.00%	3.519	87.981	139.240	39.6	51.259	0.000	0
Brecon Beacons NP	0.368	100.00%	0.368	9.200	120.100	211.8	105.925	0.000	0.36
Merthyr Tydfil	0.199	100.00%	0.199	4.975					
Bridgend	0.699	100.00%	0.699	17.471	27.270	39.0	9.799	0.000	0.15
Rhondda Cynon Taf	0.753	100.00%	0.753	18.816	9.830	13.1	-8.986	8.986	0
Vale of Glamorgan	0.672	100.00%	0.672	16.806	18.730	27.9	1.924	0.000	13
Caerphilly	0.535	100.00%	0.535	13.371	31.280	58.5	17.909	0.000	5.21
Cardiff	1.383	100.00%	1.383	34.578	27.800	20.1	-6.778	6.778	0
Blaenau Gwent	0.201	100.00%	0.201	5.027	1.320	6.6	-3.707	3.707	0
Monmouthshire	0.235	100.00%	0.235	5.866	11.250	47.9	5.384	0.000	0
Newport	0.434	n/a	0.434	10.854	0.000	0.0	-10.854	10.854	0
Torfaen	0.258	n/a	0.258	6.441	0.000	0.0	-6.441	6.441	0
<b>Sub-totals, South Wales</b>	<b>12.485</b>	<b>97.04%</b>	<b>12.176</b>	<b>304.420</b>	<b>495.66</b>			<b>46.043</b>	<b>32.54</b>
<b>TOTALS Wales</b>	<b>20.224</b>	<b>93.05%</b>	<b>18.872</b>	<b>471.786</b>	<b>670.850</b>			<b>81.971</b>	<b>34.20</b>

- 5.25 The requirements, as set out in paragraph 49 of MTAN1, are that a minimum 10-year landbank of crushed rock and a minimum 7-year landbank for sand and gravel should be maintained throughout the entire plan period of each LDP. In effect, this means having a minimum landbank for sand & gravel of 22 years, at the start of a 15-year Plan period, and a minimum crushed rock landbank of 25 years. In each case, the landbank is required, by MTAN 1 to be based on an average of the most recent 3 years' production figures. That was modified, in the RTS First Review, to be based on an average of 10-years production figures, since that was adopted as the main guide for future levels of demand. For the present review, a further modification is needed, such that the landbank is expressed in terms of the annualised apportionment figure recommended for each LPA. In all cases, these are higher than the 10-year or 3-year historical sales averages, and the landbanks are therefore correspondingly reduced, increasing the likelihood for new allocations being required. It must be emphasised, however, that at the start of any given Plan period, the overall provision (total apportionment) can be represented by a combination of existing landbanks of permitted reserves and (where necessary) new allocations (subject to the minimum landbank figures being available).

#### Sand & Gravel / Crushed Rock Aggregates Split

- 5.26 In order to carry out the required calculations, it was necessary first to distinguish between natural sand & gravel and crushed rock requirements. To do this, it has been assumed that the new apportionments will be divided between the two aggregate types in the same ratio as shown by the historical sales data, over the 10-year baseline period. One exception to this has been The Pembrokeshire Coast National Park where the apportionment has been reduced slightly, so as not to exceed the remaining landbank of permitted reserves. This has been to avoid the necessity of requiring new allocations to be identified within the National Park<sup>18</sup> and has been achieved by a corresponding slight increase in the apportionment for Ceredigion, and with corresponding changes to the crushed rock apportionments in order to maintain the overall apportionments for each area.
- 5.27 Theoretically, there may sometimes be opportunities to achieve the overall requirements with a different balance of aggregate types – for example where there is a surplus of permitted crushed rock reserves but a shortage of sand & gravel. In practice, however, this combination of circumstances occurs in only one LPA – Gwynedd. Even in that area, the substitution may not be appropriate, depending on the particular end-uses involved. The reverse situation, where there are surpluses of permitted sand & gravel reserves, is found only in Carmarthenshire. In that case, however, there is a much larger surplus of crushed rock, so no necessity for substitution to occur.

#### Surpluses, Shortfalls and Allocations

- 5.28 For **land-won sand & gravel**, Tables 5.4 and 5.5 reveal that new allocations to meet RTS requirements over the next 22 years will be required within Flintshire, Wrexham, Gwynedd and Ceredigion. Current landbanks, expressed in terms of the

<sup>18</sup> MTAN 1 (para 52) seeks to avoid new allocations within National Parks, save in exceptional circumstances.

new annualised apportionments, are already less than the minimum level of 7 years in three of these areas, demonstrating the urgency for granting new permissions, as well as longer-term allocations for future working. In the fourth area (Wrexham), the landbank is currently adequate, at just under 20 years, but a further allocation is needed to meet the RTS requirement over the full plan period.

- 5.29 Only one LPA in the whole of Wales (Carmarthenshire) currently has a surplus of existing permitted reserves of sand & gravel. The remaining LPAs have neither a surplus nor deficit for sand & gravel provision but, in most cases, this is simply because they currently have no production and no apportionment. An exception to this is the Pembrokeshire Coast National Park which (as a consequence of ensuring that it's apportionment will not exceed the current landbank) has just sufficient reserves to cover the 22-year period required. In future years, the requirement which has hitherto fallen on the National Park will need to be supplied by other adjoining areas. In South East Wales, the zero requirements for land-won sand & gravel production are critically dependent upon the continued availability of marine-dredged aggregates. If that source of supply were to be disrupted, there would be an urgent need to reconsider the apportionments to all of the authorities in that area.
- 5.30 For **crushed rock**, Tables 5.6 and 5.7 reveal that many parts of Wales already have substantial permitted reserves of crushed rock, with landbanks in excess of the required minimum of 25 years. However, shortfalls of permitted reserves, with corresponding requirements for new allocations and/or new permissions, are identified in nine separate LDP areas.
- 5.31 Three of these (Swansea, Newport and Torfaen) correspond to the areas which previously had zero apportionments, and where new sources of supply now need to be found, either within those areas or, if it cannot be avoided, in neighbouring parts of the same sub-regions (subject to the preparation of Statements of Sub-Regional Collaboration with the other LPAs, in accordance with the guidelines set out in Annex A of this document). In the case of Swansea, the reserves requirement (specifically for HSA (high PSV) sandstone) could *theoretically* be subsumed within the surplus available in adjoining Neath Port Talbot, though that would defeat the objective of seeking a more equitable sub-regional balance. For Newport and Torfaen, part of their combined requirement of almost 17.3 million tonnes could *theoretically* be offset by the surplus of almost 5.4 million tonnes in Monmouthshire<sup>19</sup>, although that would still leave a considerable deficit and again would defeat the objective of seeking a more equitable balance. The word 'theoretically' is italicised in these observations because it is not the intention of the RTS to encourage the 'trading' of apportionments between LPAs, other than in *exceptional circumstances*, as set out in the Guidelines at Annex A.
- 5.32 The six other LPAs with shortfalls of permitted crushed rock reserves are Flintshire, Ceredigion, Pembrokeshire, Rhondda Cynon Taf, Cardiff and Blaenau Gwent. In the case of RCT and the Cardiff, the combined shortfall of more than 15.7 mt is dwarfed

<sup>19</sup> The surplus reserves in Monmouthshire are bound up in a single site which has been inactive for many years and are constrained, in part, by the need for dewatering the Carboniferous Limestone aquifer, which would be subject to abstraction licensing requirements.

by the net surplus of almost 120 mt within the Cardiff City sub-region as a whole, though most of that lies within the Brecon Beacons National Park and the RTS seeks to reduce, rather than increase, the dependency on that area for future supply. The shortfall in RCT is matched by the slightly larger surplus in Bridgend, whilst that in Cardiff is more than matched by the surplus in Caerphilly. Once again, however, to rely on those reserves instead of finding new allocations as indicated in Table 5.7 would defeat the objective of seeking a more sustainable long-term pattern of supply in the area and is therefore not encouraged.

- 5.33 The remaining LPA facing a shortfall of permitted crushed rock reserves – Blaenau Gwent – falls within the same ‘Former Gwent’ sub-region as Torfaen, Newport and Monmouthshire which, even combined, have a net shortfall of more than 15.6 mt.

#### Types and Size of Allocations

- 5.34 A key requirement, in terms of identifying allocations for future working within an LDP, is to be able to demonstrate that adequate provision has been made for supplying *at least* the minimum quantity identified for the authority in the RTS (or in a SSRC where a different figure has been agreed through sub-regional collaboration). This, in turn, means that the quantity of workable mineral within the allocation needs to be known, as far as possible. In most cases, this is only likely to be feasible within Specific Sites. Preferred Areas will generally not have sufficient information to be able to do this, though it may sometimes be possible for reasonable estimates to be made.
- 5.35 In each case, where sufficiently detailed information exists, it is therefore recommended that the allocations should take the form of **Specific Sites**, as defined in Paragraph 5.14.19 of Planning Policy Wales (PPW) i.e. *“where mineral resources of commercial significance exist, and where any planning applications which come forward for those sites are likely to be acceptable in planning terms”*. In terms of size, Specific Sites should aim, not simply to deliver the bare minimum identified as an allocation requirement in the RTS (or SSRC) but may need to be larger: they will need to be of sufficient size to be commercially viable.
- 5.36 Where Specific Sites cannot be defined, allocations should normally at least take the form of **Preferred Areas** (*“areas of known resources with some commercial potential, and where planning permission might reasonably be anticipated”*), within which operators should be encouraged to bring forward more specific proposals. Inevitably, for a given minimum size of allocation, such areas will need to be significantly larger than individual sites, in recognition of the fact that only part of the area may eventually be brought forward.
- 5.37 **Areas of Search** (*“...broad areas that are believed to contain mineral resources of commercial significance but whose extent is uncertain...”*) will usually have only minimal information on the suitability and commercial viability of the resources for commercial development and, as noted in PPW, it will not usually be appropriate to only rely on these for the purposes of making allocations. There will be some situations, however, where there is insufficient knowledge about potential resources to identify anything other than Areas of Search. Where this is the case, it

is recommended that the Area(s) so identified should provide the potential for the release of new permitted reserves which are far greater than the minimum allocation recommended, in order to allow for the uncertainties involved.

- 5.38 In some cases, it may be better, in terms of deliverability, to rely on specific sites (whether existing permissions or new allocations) in neighbouring authorities (additional to those LPAs' own requirements), where such reliance has been agreed through collaborative working and formalised within an agreed SSRC (see para. 1.27, above), in preference to relying upon the uncertainty associated with broad Areas of Search.

#### Treatment of Dormant Sites

- 5.39 As noted in Chapter 2 (para. 2.4), where an LPA considers that the permitted reserves at dormant sites are likely to be capable of being worked in the relevant period (subject to Environmental Impact Assessment and the agreement of modern conditions) it may be possible for those reserves to be offset against the requirement for new allocations. This would only work, however, if the sites in question meet the same expectations as for other allocations, i.e. that they comply with the definition of Specific Sites or at least Preferred Areas, as given in PPW.

#### Compliance with and Departures from RTS Recommendations

- 5.40 The outcome of this strategic exercise has been a deliberate attempt to control, and in some cases to modify, the future pattern of supply of land-won primary aggregates in Wales, in line with sustainability principles. In a small number of areas, notably where there has been no production of land-won aggregates for many years, with no permitted reserves and zero apportionments, the Steering Group accepted that there may be insufficient evidence, at present, to determine the precise levels of apportionment and resulting allocations required for individual LPAs. In such cases, more detailed analysis will be required, at the local level, through collaboration between adjoining LPAs and consultation with industry, in order to confirm realistic figures for those particular LPAs and (*in exceptional circumstances*) to consider the possibility of alternative patterns of supply within the sub-region concerned.
- 5.41 To this end (and more generally, to ensure that the regional and sub-regional totals recommended by the RTS are achieved), this Review has introduced a requirement for all LPAs within each sub-region to produce Statements of Sub-Regional Collaboration (SSRCs), in consultation with industry, through the RAWPs, prior to the Examination of any individual LDP within that area. Specific guidelines relating to the preparation of SSRCs, including details of the exceptional circumstances tests, are provided at Annex A of this document.
- 5.42 Finally, it should be noted that the recommendations made in this Chapter are based on currently available information regarding permitted reserves, production, proximity and environmental capacity. As noted in 'Box 1' of the original RTS documents, and repeated in the First Review, the suggested apportionments and allocations do not take fully into account all factors that may be material to the



ensuring an adequate supply of aggregates obtained from appropriately located sources. Such factors may, *inter alia*, include such things as:

- The technical capability of one type of aggregate to interchange for another;
- The relative environmental cost of substitution of one type of aggregate by another;
- The relative environmental effects of changing patterns of supply; and
- Whether adequate production capacity can be maintained to meet the required level of supply.

5.43 For such reasons, and as already noted in Chapter 1 (para. 1.29), where it is justified by new (e.g. more up to date, more detailed or more precise) evidence, it is open for individual LPAs to depart from the apportionment and allocation figures recommended by the RTS when preparing their LDP policies. In doing so, however, an LPA would need to demonstrate that their intended departure would not undermine the overall strategy provided by the RTS itself (e.g. by working together with other LPAs within the same sub-region to ensure that sub-regional and regional totals are still achieved) and this would need to be reflected in the SSRC agreed with neighbouring LPAs for that area, prior to Examination.

5.44 Where the local authorities involved are unable to reach agreement, or if individual local authorities do not accept the revised Regional Technical Statement, the Welsh Government will, as a last resort, consider its default powers to intervene in the Development Plan process (MTAN 1, paragraph A3).

## 6. Consultation Process

- 6.1 This First Review of the RTS documents for North Wales and South Wales has been undertaken as a collaborative exercise with several stages of consultation and technical peer review.
- 6.2 At the outset of the project, initial consultation meetings were held with a range of stakeholders to ensure that the Review was properly focused and that key sources of information were made available for consideration. The organisations and/or representative individuals consulted were as follows:
- Hugh Towns, Secretary of the South Wales Regional Aggregates Working Party
  - Gary Nancarrow, Secretary of the North Wales Regional Aggregates Working Party
  - Nick Horsley and others, representing the Mineral Products Association (MPA)
  - Trefor Evans representing the British Aggregates Association (BAA)
  - Ian Gorton and others, representing Natural Resources Wales (NRW)
- 6.3 The findings of this early stage of consultation are detailed in the Interim Report, issued on 18<sup>th</sup> January 2019 (pdf copies available on request from the author).
- 6.4 Initial drafts of the revised RTS were then produced in stages between May and August 2019. At each stage, consultation was held with a Project Steering Group made up of the RTS sub-committees of the two Regional Aggregate Working Parties (including mineral operators, mineral planning authorities and Natural Resources Wales). This consultation entailed issuing drafts for comment, Steering Group meetings chaired by Joanne Smith of the Welsh Government, and the preparation of revised drafts incorporating responses to all Steering Group comments received, including the receipt of new technical data. Each successive draft superseded previous versions.
- 6.5 The second draft was issued to the entire membership of both RAWPs and comments on that version were received at a joint North Wales and South Wales RAWP meeting in July 2019.
- 6.6 Following discussion at that meeting, and written comments received from members, a third draft was produced. English and Welsh versions were then issued for wider (public) consultation and drawn to the attention of all Local Planning Authorities in Wales, by the Welsh Government's Chief Planner. Those versions were made available via the Websites of both RAWPs for an eight-week consultation period, between 30<sup>th</sup> September and 25<sup>th</sup> November, 2019. Within that period, two consultation events were held, on 11<sup>th</sup> November at Bridgend in South Wales and on 15<sup>th</sup> November at Llandudno Junction in North Wales. At each event, the RTS review process was clearly explained and the findings, including recommendations to individual LPAs, were presented for discussion and comment. This was the main opportunity for interested parties to scrutinise the documents and to be satisfied that they were acceptable and fit for purpose, taking account of local and sub-regional perspectives.

- 6.7 Following consultation, additional meetings were held with a number of LPAs in South Wales, and with representatives of the Mineral Products Association, to discuss particular concerns relating to sub-regional collaboration and to finalise guidance on this (which had been called for during consultation). A consultation report, which included the Steering Group's recommended responses to the various issues raised by consultees, was produced in June 2020.
- 6.8 A further revision of the RTS (this document and the two Regional Appendices) was then carried out to reflect the recommendations of the consultation report and to incorporate the finalised version of the guidance, (Annex A).
- 6.9 The final edition will be translated into Welsh and issued for endorsement by individual LPAs, after which it will be endorsed for publication by the Welsh Government.
- 6.10 As with previous editions of the RTS, in the interests of sustainability, it is not intended that printed copies will be issued.

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## Annex A: Guidance Note on Sub-Regional Collaboration

This Second Review of the Regional Technical Statements for Aggregates Provision in Wales (RTS) introduces a new requirement for all LPAs to agree **Statements of Sub-Regional Collaboration** (SSRCs) in respect of their contributions to the future provision of land-won primary aggregates. In response to suggestions received during the public consultation of the 2<sup>nd</sup> Review, the following Guidance has been prepared on behalf of the Welsh Government and the two Regional Aggregate Working Parties, in consultation with the project Steering Group.

SSRCs are required to be prepared, collaboratively, by all constituent LPAs within each RTS sub-region (as defined by the RTS 2<sup>nd</sup> Review) as part of the evidence base needed to support each Local Development Plan (LDP) or Strategic Development Plan (SDP). The timescale for preparing SSRCs will therefore need to be geared towards the timescale for the earliest LDP (or SDP) submission within that sub-region. Once agreed, an SSRC will remain in place until it becomes superseded by the requirements of future reviews of the RTS, or new information comes forward which justifies a change.

By default, each SSRC will simply confirm that all constituent LPAs within a particular RTS sub-region accept the individual apportionments for aggregates for their individual Authority areas, as set out in the latest Review of the RTS, and that (*as a minimum*) the RTS requirements for that sub-region as a whole will therefore be met.

In exceptional circumstances, an SSRC may identify an alternative pattern of supply which achieves the RTS requirements for that particular sub-region in a different way. Such circumstances may arise either where one or more LPAs within the sub-region are unable to meet the minimum requirements of their apportionments identified in the RTS or where an alternative, achievable and more sustainable pattern of supply is identified through collaboration between the LPAs involved.

The following considerations will apply, in such circumstances:

1. **Inability to meet RTS apportionments:** In order to demonstrate an inability to meet RTS apportionments, an LPA would need to show either that it has no (or insufficient) workable aggregate resources of the type required by the RTS and/or that there is no interest from the minerals industry in developing such resources within the area. It will *not* be sufficient simply to demonstrate that the area has no existing quarries or no recent production, or that alternative resources and/or permitted reserves exist within another LPA.
2. **An alternative pattern of supply:** Where an alternative pattern of supply is proposed this will entail transferring some or all of the RTS apportionment from one LPA to one or more other LPAs within the same sub-region, so as to make corresponding increases in provision within those authorities, as required by MTAN 1. The receiving authorities

will need to increase their apportionments<sup>20</sup> (and, where necessary, allocations<sup>21</sup>), to ensure that *as a minimum*, the overall requirements for ongoing supply within that sub-region, as set out in the RTS, are met (both numerically and in terms of aggregate type<sup>22</sup>). It will not normally be appropriate to merely transfer apportionments to an LPA with sufficient existing reserves to arithmetically absorb the apportionment, without reference to the additional consideration of productive capacity<sup>23</sup>.

Where any adjustments are made, the details and justifications will need to be set out clearly in the SSRC and will be subject to Examination as part of the LDP or SDP process.

The LPAs involved should demonstrate, as far as possible, that the SSRC has been produced in consultation with relevant stakeholders, including the Regional Aggregate Working Party (RAWP), as part of the LDP process. The RAWP would not have any powers of approval over SSRCs but would simply provide a forum for discussion of proposed arrangements and, where necessary, could raise objections.

Where there is clear evidence that the sub-region as a whole cannot meet its collective apportionment, SSRCs may be extended to include one or more other LPAs in directly adjoining parts of a neighbouring sub-region. This may be appropriate, for example, for LPAs which become part of a single SDP sub-region, even though they are in different RTS sub-regions. However, the considerations, as outlined above, would still apply.

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<sup>20</sup> This will not apply to National Park Authorities, where the apportionments stated within the RTS shall not be increased.

<sup>21</sup> Where an apportionment (or part thereof) is transferred from one LPA to another, the receiving authority will need to calculate its resulting total apportionment, over 25 years (for crushed rock) or 22 years (for sand & gravel) and compare those figures with existing landbanks. Where this results in a shortfall of permitted reserves, corresponding allocations for future working will need to be identified within that authority's area to make up the deficit.

<sup>22</sup> Where alternative sources of supply are to be considered, the alternative must either be of the same type or, at least, one that is fully capable of meeting the same end-use specifications. For this reason, and to avoid the inappropriate use of specialist aggregate types, it should be noted that High Specification Aggregates such as those with a high Polished Stone Value (PSV) are not interchangeable with other aggregate types.

<sup>23</sup> Whether or not adequate productive capacity is maintained within a given area will, in part, be the responsibility of industry. All that is expected of LPAs in such cases is that they facilitate such capacity through planning permissions and realistic allocations for future working in accordance with Planning Policy Wales and MTAN 1.

## Glossary

The following terms are frequently used in relation to aggregate supply and apportionment. The terms are listed in topic groupings rather than alphabetically.

Term	Definition, in relation to the supply of aggregates
<b>TOPIC: Aggregate Materials</b>	
<b>Aggregate</b>	Crushed rock, natural sand and gravel or artificial granular material that is used in construction, often in conjunction with a suitable binding agent such as bitumen or cement.
<b>Primary Aggregates</b>	Aggregates sourced directly from naturally occurring geological materials as a primary product (as distinct from secondary aggregates, including excavation wastes, produced as a by-product from the extraction or processing of geological materials for other primary purposes).
<b>Secondary Aggregates</b>	These are usually by-products of other industrial processes, or the arisings from non-aggregates extractive operations, that have been processed to meet the specification requirements for construction aggregate materials. They can be sub-divided into manufactured and natural materials, depending on their source. Examples of manufactured secondary aggregates are pulverised fuel ash (PFA) and metallurgical (iron and steel) slags. Natural secondary aggregates include china clay sand, ball clay sand, aggregate produced from slate waste or colliery spoil and excavation wastes (as defined below). All of these are exempt from the aggregates levy, giving them a deliberate cost advantage over primary materials, in an attempt to encourage their greater use.
<b>Construction, Demolition and Excavation Wastes (CD&amp;EW)</b>	A term referring to wastes (see below) arising from the construction or demolition of buildings and/or civil engineering infrastructure, or from excavations associated with land levelling, foundations or other civil engineering works. Aggregates may be derived from some of these various waste streams, either as recycled materials or from excavation wastes (both of which are defined separately below).
<b>Waste</b>	Any substance or object which the holder discards or intends, or is required, to discard. In CD&EW surveys, materials arising from construction or demolition works, or from associated excavations, which are beneficially used <i>in an unprocessed form</i> on the site on which they arise are generally not regarded as waste, because they are not generally regulated as waste.
<b>Road planings</b>	A particular example of CD&EW materials, comprising aggregate and bituminous or cement binder materials that have been 'planed' from the surface of a worn out road prior to resurfacing with new or recycled materials.
<b>Recycled Materials suitable for use as Aggregate</b>	These are materials, usually arising from construction or demolition projects, which have previously been used for construction purposes, and which are capable of being recycled or re-used as construction aggregates for a second or further time. In the Finance Act 2001, all materials previously used in construction are exempt from the aggregates levy, giving them a deliberate cost advantage over primary aggregates in an attempt to encourage their greater utilisation.
<b>Excavation Waste suitable for use as Aggregate</b>	These are materials that may be suitable, with or without processing, for use as secondary aggregates, arising from excavation works: <ul style="list-style-type: none"> <li><b>a)</b> on the site of any building or proposed building, where the excavation is undertaken exclusively for the purposes of laying foundations, pipes or cables;</li> <li><b>b)</b> on the site of any river, canal, watercourse or navigational channel, where the excavation is undertaken exclusively for the purpose of creating, restoring, improving or maintaining that feature;</li> <li><b>c)</b> along the line or proposed line of any highway or proposed highway, where the excavation is undertaken for the purpose of constructing, improving or maintaining the highway and not wholly or mainly for the purpose of extracting aggregate.</li> </ul> Each of these categories, as defined more precisely in the Finance Act 2001, is exempt from the aggregates levy, giving these materials a deliberate cost advantage over primary materials in an attempt to encourage their greater utilisation.
<b>Mineral Wastes</b>	Mineral wastes are identified in MTAN1 as a further category of material with potential for use as aggregate. The term is specifically used to encompass aggregates from slate waste, colliery spoil, and crushed rock fines (i.e. the "dust" generated from crushing and screening operations in hard rock primary aggregate quarries). It may also include aggregates produced from the excavation and processing wastes at building stone (dimensional stone) quarries. Aggregates produced from slate waste and colliery spoil are classed as secondary materials (see above) and are exempt from the aggregates levy. The same is not true of crushed rock fines, or of the residue from building stone production, both of which remain classed as primary aggregates and are not exempt.



<b>TOPIC: Supply and Demand</b>	
<b>Production</b>	The overall rate at which products are generated, in tonnes (or millions of tonnes) per year, <i>whether or not they are sold</i> . In quarrying, production includes any unsaleable materials that may be produced, including overburden, interburden and processing waste, which may or may not be useable.
<b>Sales</b>	The rate at which products are sold, in tonnes (or millions of tonnes) per year. In quarrying, for the reasons outlined above, this will usually be less than the rate of production.
<b>Consumption</b>	The rate at which products are used, within a specified market area, measured in tonnes (or millions of tonnes) per year.
<b>Demand</b>	The need or desire for a product, backed by an ability to pay. Demand is measured over a given time period, and is affected by budgets, prices, preferences and the availability and price of alternative products. Demand for aggregates may be expressed in terms of the rate at which it is expected to be used within a particular market area (which is rarely known), or the rate at which it is expected to be supplied from a given source area, and is measured in tonnes (or millions of tonnes) per year.
<b>Supply</b>	The amount of a product which is supplied. Supply of aggregates is normally expressed in relation to a particular source area and is measured in tonnes (or millions of tonnes) per year.
<b>Distribution</b>	The pattern of market destinations served by the sales from a particular quarry or group of quarries.
<b>Proximity Principle</b>	The general concept of minimising the transportation of aggregates (and other bulk materials) by road, in accordance with para. 26 of MTAN1, in order to reduce associated impacts on the environment.

<b>TOPIC: Resources, Reserves and Landbanks</b>	
<b>Resources</b> (of primary aggregate)	Geological materials, including rocks and naturally occurring sand & gravel, which have the potential to be used as aggregates. The presence of a resource does not imply an acceptance of mineral working.
<b>Permitted Reserves</b> (of primary aggregate)	Primary aggregate resources which have the benefit of planning permission for the winning and working of minerals.
<b>Landbank</b> (of primary aggregate reserves)	In general, a landbank is a stock of planning permissions for the winning and working of minerals within a specified area, expressed both in millions of tonnes and in terms of the number of years' supply which they represent. The latter is usually calculated on the basis of recent rates of production.
<b>Current Landbank</b> (of permitted primary aggregate reserves)	In MTAN1 (paragraph 45), this is defined as <i>"the sum of all permitted reserves at active and inactive sites at a given time and for a given area"</i> , and is required to be based on <i>"the latest 3 years production figures"</i> (production, in this case, usually being represented by sales). <b>For the purposes of the RTS, and in the interests of adopting a more practical approach to the strategic planning of aggregates provision in Wales, two deliberate departures from this definition were agreed by the Steering Group at the time of the First Review.</b> Firstly, although 'inactive sites' technically include those which are dormant or suspended, the current landbank has been taken to exclude those sites (but see also 'Dormant Reserves' below). Secondly, in recognition of the prolonged economic recession, the agreed method of calculating the landbank has been to use the average of the latest 10 (rather than 3) years' sales figures.
<b>Dormant Reserves</b>	The permitted reserves of primary aggregates at Dormant sites (see below). MTAN1 (paragraph 47) requires these to be <i>"clearly shown in the landbank calculations as a separate category"</i> . For the purposes of this review, such reserves and those at sites where permission has been suspended (see below) have therefore been excluded from the main landbank calculations used to determine future allocation requirements, though in some cases they might be able taken into account by local authorities to offset any requirement for new allocations, subject to more detailed local knowledge.
<b>Future Landbank</b> (of primary aggregate reserves)*	In MTAN1 (paragraph 45), the Future (or 'Extended') Landbank is defined as <i>"land specifically allocated for the working of aggregates"</i> (but see footnote below*)
<b>Apportionment</b>	The rate for which the mineral planning system requires provision to be made, in Development Plans, for the supply of aggregates from a given area or region. This may be expressed either in terms of millions of tonnes over a specified period, and/or as an averaged 'annualised apportionment' in millions of tonnes per year.
<b>Allocation</b>	The identification, within a Local Development Plan, of an area of land for future mineral working. In Wales, the size (in terms of tonnage) of allocations required in specific LDPs are defined in the Regional Technical Statements, but only for areas in which the cumulative apportionments over the period covered by the RTS are in excess of the available landbank of permitted reserves, at the time of the baseline date used in the assessment (in this case 31/12/16).
<b>Provision</b>	The total amount of aggregate required to be supplied from a particular local authority over a period of time, such as the duration of its Local Development Plan. The overall provision may comprise both a landbank of permitted reserves and allocations for future working.
* The term 'Future Landbank' is somewhat confusing, since a landbank is a stock of planning permissions and (by definition), allocations do not have this status. Allocations may thus form part of the overall 'provision' within a Local Development Plan, but cannot form part of the landbank.	

<b>TOPIC: Quarry Status</b>	
<b>Active Site</b>	Active sites in Wales are explicitly defined by the Town and Country Planning (Fees for Applications and Deemed Applications) (Amendment No.2) (Wales) Regulations 2006 as sites where “ <b>a</b> ) <i>development to which the relevant mineral permission or landfill permission relates is being carried out to any substantial extent; or b</i> ) <i>other works to which a condition attached to such permission are being carried out to any substantial extent</i> ”. “Substantial extent” is not defined, but relevant guidance is provided in Minerals Planning Guidance Note 14 (MPG14): Environment Act 1995:- Review of Mineral Planning Permissions.
<b>Inactive Site</b>	Defined by the Town and Country Planning (Fees for Applications and Deemed Applications) (Amendment No.2) (Wales) Regulations 2006 as one “ <i>which is not an active site</i> ”, as defined above. Inactive sites thus include, but are not limited to, those which are classified under the Environment Act 1995 as being dormant and those where planning permission has been suspended (see below).
<b>Dormant Site</b>	<p>As defined in the Environment Act 1995, this refers specifically to quarries with mineral permissions granted between 30<sup>th</sup> June 1948 and 22<sup>nd</sup> February 1982 (i.e. “Phase I” and “Phase II” sites, as defined in the Act) where no minerals development was carried out to any substantial extent in, on, or under the site at any time in the period beginning on 22 February 1982 and ending with 6 June 1995. These sites still have valid planning permissions but, since 1<sup>st</sup> November 1995 it has not been lawful to recommence or carry on working a dormant site until full modern planning conditions have been approved by the Local Planning Authority (LPA), through the process of an initial ROMP review (see below).</p> <p>In some areas there are additional, ‘dormant IDO’ sites, as defined within the Planning and Compensation Act, 1991. These are sites which were originally granted consent under ‘Interim Development Orders’ (IDOs), in the period between 22 July 1943 and 1 July 1948, and which were subsequently registered under the 1991 Act (thus retaining valid planning permission), but where no substantial work was carried out between 1 May 1989 and 30<sup>th</sup> April 1991. For these sites, a scheme of operation and restoration conditions is required to be submitted to the relevant LPA together with an acceptable Environmental Assessment, before they can lawfully be reactivated.</p>
<b>ROMP</b>	<p>The acronym for ‘Review of Old Mineral Permissions’ carried out in accordance with the Environment Act 1995. Sites which obtained planning permission between 1948 and 1982, whether active, inactive or dormant, were required by this Act to be subject to an Initial Review in order that modern planning conditions can be agreed. In addition, all sites (including reactivated ISO permissions) are required to be subject to subsequent Periodic Reviews at intervals of not less than 15 years. ROMP applications cannot be refused, since valid planning permissions already exist.</p> <p>However, court judgments, guidance and regulations have since clarified that both the ROMP process, and the approval of new conditions at IDO sites, amount to obtaining new development consents and are therefore subject to Environmental Impact Assessment.</p>
<b>Stalled ROMP / Suspended Permission</b>	Where a ROMP review has begun but has not been completed (e.g. because an Environmental Statement has not been submitted), the ROMP process is said to have ‘stalled’. In accordance with the Town and Country Planning (Environmental Impact Assessment) (Undetermined Reviews of Old Mineral Permissions) (Wales) Regulations 2009, planning permission then becomes ‘suspended’ - i.e. it ceases to authorise any minerals development. As with dormant sites, suspended permissions cannot lawfully be operated until the process (including Environmental Impact Assessment) has been completed and modern conditions agreed.

## Abbreviations

The following abbreviations are commonly used throughout the RTS.

AAV	Aggregate Abrasion Value
AM survey	Aggregate Minerals survey
AONB	Area of Outstanding Natural Beauty
BAA	British Aggregates Association
BGS	British Geological Survey
BMAPA	British Marine Aggregate Producers Association
CD&EW	Construction, Demolition and Excavation Waste
CPRW	Council for the Protection of Rural Wales
EA	Environmental Assessment
EC	European Commission
EIA	Environmental Impact Assessment
EMAADS	<i>Establishing a Methodology for Assessing Aggregates Demand and Supply</i> (project title)
ES	Environmental Statement
EU	European Union
FBA	Furnace Bottom Ash
GDP	Gross Domestic Product
GIS	Geographic Information System
HMRC	Her Majesty's Revenue & Customs
HSA	High Specification Aggregate
IDO	Interim Development Order
IMADP	Interim Marine Aggregates Dredging Policy
IMAECA	<i>Implementing the Methodology for Assessing the Environmental Capacity for primary Aggregates</i> (project title)
ISO	International Organisation for Standardisation
LDP	Local Development Plan
LPA	Local Planning Authority
MASS	Managed Aggregate Supply System
MHCLG	Ministry of Housing, Communities and Local Government
MPA	Mineral Products Association
MPPW	Minerals Planning Policy Wales
mt	Million tonnes
mtpa	Million tonnes per annum
MTAN	Minerals Technical Advice Note
NPA	National Park Authority
NRW	Natural Resources Wales
OBR	Office of Budget Responsibility
PFA	Pulverised Fuel Ash
POS	Planning Officers Society
PPW	Planning Policy Wales
PSV	Polished Stone Value
RAWP	Regional Aggregate Working Party
ROMP	Review of Old Mineral Permissions
RTS	Regional Technical Statement
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SSSI	Site of Special Scientific Interest
WG	Welsh Government

## Acknowledgements

The RTS 2<sup>nd</sup> Review was undertaken by Cuesta Consulting Limited under contract to the Welsh Government. The work was guided and overseen by a Steering Group, appointed by Welsh Government, to represent the key stakeholder groups involved. Grateful thanks are extended by the author to all members of this Group for their diligence and patience in guiding each stage of the work and for scrutinising the draft and final reports. It should be noted that, whilst consensus was achieved between all members of the Steering Group on most issues, where agreement could not be reached, the views of the Welsh Government prevailed.

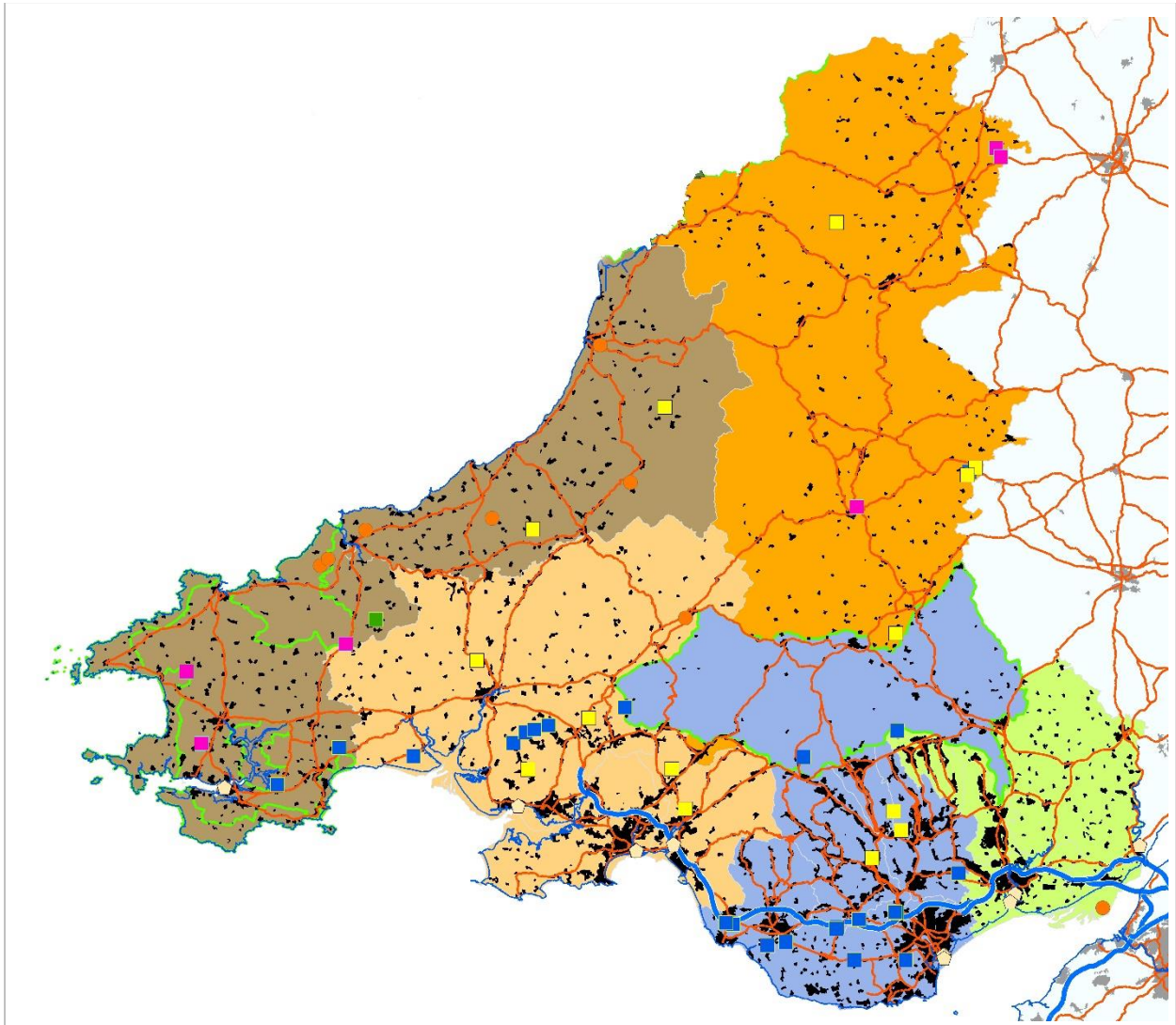
The Steering Group comprised:

- **Welsh Government:** Joanne Smith; Gareth Dudley-Jones
- **Secretary, North Wales Regional Aggregates Working Party:** Gary Nancarrow
- **Secretary, South Wales Regional Aggregates Working Party:** Hugh Towns
- **National Resources Wales:** Ian Gorton
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- **British Aggregates Association:** Trefor Evans\*
- **Gwynedd Council:** Dafydd Gareth Jones
- **Brecon Beacons National Park Authority:** Donna Bowhay

\* It is noted with deep sadness that Trefor passed away in April 2020

# Regional Technical Statement (2<sup>nd</sup> Review)

## Appendix B (South Wales)



*Final – September 2020*



Llywodraeth Cymru  
Welsh Government

South Wales  
Regional  
Aggregates  
Working Party  
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## Appendix B: South Wales Region - Detailed Analysis & Recommendations

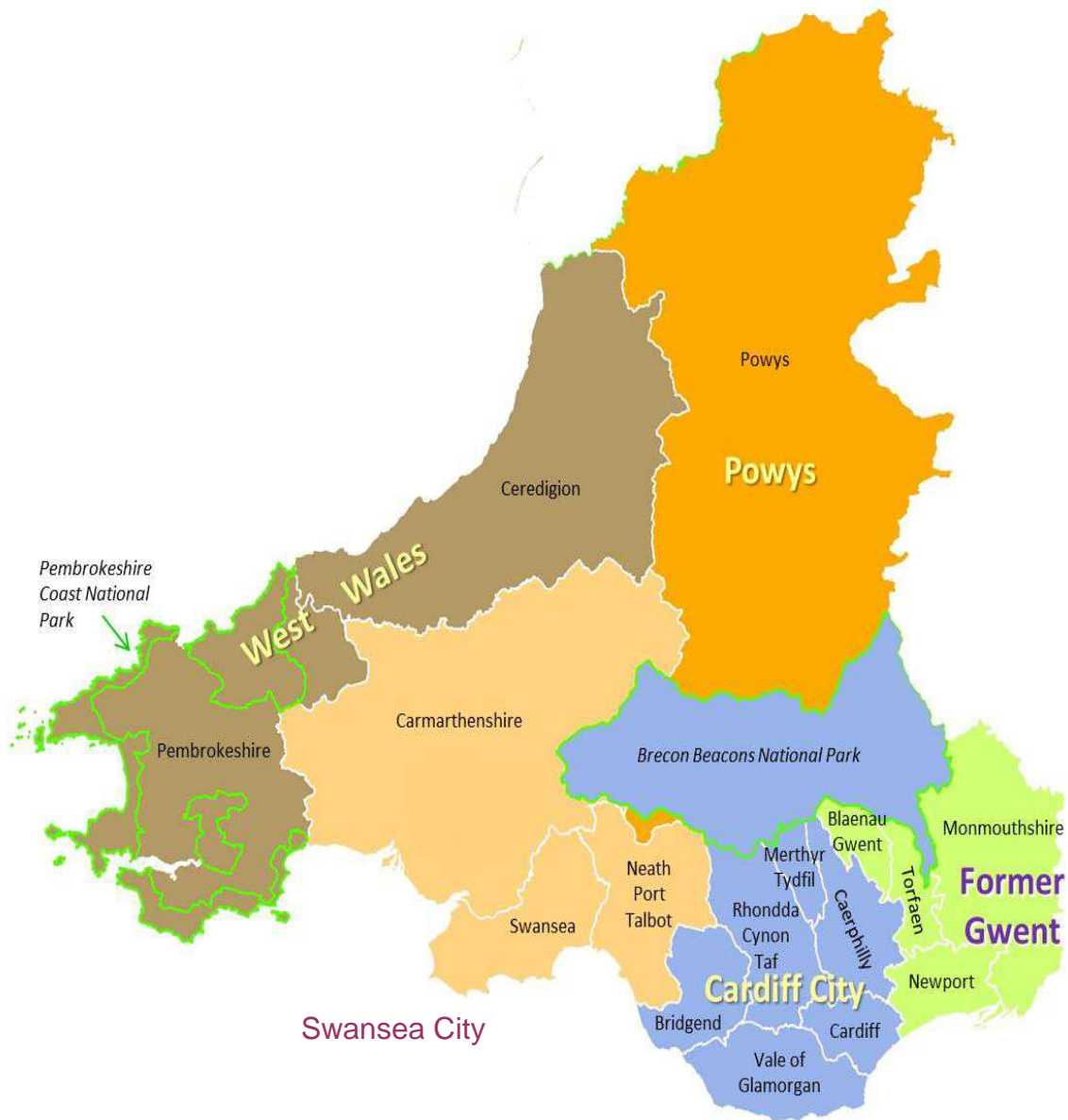
### *Introduction*

- B1. This appendix is intended to complement, and should be read in conjunction with, the main document of the Second Review of the RTS. It provides additional explanation, specific to the South Wales Regional Aggregate Working Party (RAWP) Region, relating to the consideration of existing supply patterns, the detailed breakdown of sub-regional apportionments and requirements for new allocations. The final part of the Appendix, from paragraph B78 onwards, incorporates that information into specific recommendations and guidance for each individual Local Planning Authority (LPA).

### *Existing Supply Patterns in South Wales – Regional Overview*

- B2. As explained in Chapter 3 of the main document, historical sales figures have been used in this review as a starting point for calculating the overall National requirement for land-won primary aggregate production in Wales, over the period covered by the revised RTS (i.e. 2020-2045). After applying a 30% uplift to reflect the planned increase in housing construction, this enhanced total has then been apportioned between North Wales and South Wales on the basis of their recent historical share of sales. The sub-regional apportionment of those regional figures has then been determined by looking carefully at the patterns of supply within each of seven sub-regions, created specifically for this purpose. That examination is briefly outlined in the main report and described more fully here.
- B3. Figure B1 shows the five sub-regions within the South Wales RAWP area. The sub-regions were created, at Welsh Government's suggestion, for the specific purpose of facilitating strategic minerals planning and collaborative approaches between LPAs. They each represent distinctive 'market areas' between which there is relatively little movement of aggregates, except for exports to England, and within which detailed, strategic consideration can be given as to the most appropriate patterns of supply. Looking carefully at the balance of supply between the LPAs within each sub-region is an important aspect of this.
- B4. For some LPAs, where the existing supply pattern already seems to provide a sensible balance between the spatial distributions of demand, resource availability and other factors, the new apportionments simply reflect the pattern of historical sales (i.e. the regional figures have been divided between the LPAs in proportion to their share of historical sales). In other areas, the new apportionments have been adjusted – primarily to take account of the distribution of planned housing activity, as indicated by the housing requirement figures in adopted LDPs - so that they reflect an improved (more equitable, more sustainable) spatial balance between supply and demand. In all cases, consideration has also been given, at least qualitatively, to factors such as environmental capacity, proximity and transport networks. The later sections of this document provide more detailed observations regarding these various factors within each of the sub-regions in South Wales.
- B5. It should be noted that the historical sales figures and apportionments relate only to land-won primary aggregates. These materials are needed to satisfy the residual levels of demand, once allowance has been made for the 'top-sliced' proportion of supply which is obtained from secondary and recycled sources and from marine-dredged aggregates. These materials contributed to the overall market throughout the baseline period and will continue to do so, leaving only the residual demand to be supplied from primary land-won sources.

**Figure B1: Sub-Regional Areas and their constituent Local Planning Authorities in South Wales**



B6. No reliable monitoring data on recycled and secondary aggregate production is currently available for any part of the UK. The recently updated Mineral Planning Factsheet on aggregates produced by the British Geological Survey (BGS, 2019)<sup>1</sup> estimates that these materials now constitute approximately 30% of overall supply (based on data provided by the Mineral Products Association), and that most of the material that is suitable for aggregates use (primarily construction, demolition and excavation waste – CD&EW) is already being recovered and utilised. This has been the case since around 2005<sup>2</sup> and the proportion is thought unlikely to change in the foreseeable future. Being closely dependent upon the rate of construction activity, the actual tonnages can therefore be expected to rise and fall in line with variations in the overall rates of economic growth and will have a neutral impact on the demand for primary aggregates, compared to that seen during the baseline period (2007 to 2016). Moreover, in the case of recycled aggregates, since the arisings of CD&EW are (by definition) very closely associated with the occurrence of new construction work, their availability is unlikely to have any significant influence on spatial patterns of demand.

<sup>1</sup> <https://www.bgs.ac.uk/downloads/start.cfm?id=1355>

<sup>2</sup> [https://mineralproducts.org/documents/Contribution\\_of\\_Recycled\\_and\\_Secondary\\_Materials\\_to\\_Total\\_Aggs\\_Supply\\_in\\_GB.pdf](https://mineralproducts.org/documents/Contribution_of_Recycled_and_Secondary_Materials_to_Total_Aggs_Supply_in_GB.pdf)



- B7. That might not be the case for secondary aggregates, which have a more varied spatial distribution, with different types and different quantities being available within each LPA. Again, there are no up-to-date data sources to provide further details, but there are indications that some of these sources may be declining in availability, which would potentially increase the demand on primary aggregates within those areas. Further observations on this are noted, where appropriate, in the later sections on individual sub-regional areas.

#### Land-won Primary Aggregate Production

- B8. The historical sales figures for all land-won primary aggregates within each LPA in South Wales (including both crushed rock and natural sand & gravel) are shown in Table B1, below. The proportion supplied from crushed rock sources (averaged over 10 years) is shown in the right-hand column. The LPAs are grouped according to the sub-regions shown in Figure B1. The origin of the data is explained fully in Chapter 3 of the main text.

**Table B1: 10-year and 3-year Total Land-Won Primary Aggregates Sales Averages (to 2016) for each LPA in South Wales.**

Local Planning Authority	10-yr Average Aggregate Sales (total) (mtpa)	3-yr Average Aggregate Sales (total) (mtpa)	Highest of 3-yr and 10-yr ave. sales in each LPA (mtpa)	Proportion from crushed rock sources
Ceredigion	0.300	0.240	0.300	63.33%
Pembrokeshire	0.510	0.360	0.510	100%
Pembrokeshire Coast NP	0.330	0.270	0.330	63.64%
Carmarthenshire	0.832	0.821	0.832	76%
Swansea	0.000	0.000	0.000	100%
Neath Port Talbot	0.460	0.300	0.460	100%
Powys	2.470	2.650	2.650	100%
Brecon Beacons National Park	0.490	0.540	0.540	100%
Merthyr Tydfil	0.150	0.010	0.150	100%
Bridgend	0.580	0.600	0.600	100%
Rhonda Cynon Taf	0.610	0.670	0.670	100%
Vale of Glamorgan	0.660	0.580	0.660	100%
Caerphilly	0.390	0.100	0.390	100%
Cardiff	0.830	1.060	1.060	100%
Blaenau Gwent	0.170	0.180	0.180	100%
Monmouthshire	0.070	0.060	0.070	100%
Newport	0.000	0.000	0.000	100%
Torfaen	0.000	0.000	0.000	100%
<b>TOTAL, South Wales</b>			<b>9.402</b>	<b>97.04%</b>

SOURCE: Collated by the South Wales RAWP secretary from confidential industry data.

- B9. The figures for land-based sand & gravel production in South Wales (i.e. zero in most cases) are greatly distorted by the reliance of South East Wales, in particular, on marine-dredged aggregates from the Bristol Channel and the Severn Estuary. West Wales is less dependent on marine aggregates and has a small number of active land-based sites, primarily within the Pembrokeshire Coast National Park and Ceredigion. Carmarthenshire also has one very small operation. Powys is too far removed from the coast to be influenced to any significant degree by marine aggregates, but still has only one small land-based sand & gravel site where planning permission has been suspended. The county is reliant instead on crushed rock material. Whilst there are potential resources of natural sand & gravel within the upper reaches of the Severn,

Wye and Usk valleys, those are primarily within the Brecon Beacons National Park, part of the Cardiff City sub-regional area.

- B10. The figures for crushed rock production within South Wales are dominated by the output from Powys, where a number of sandstone and igneous rock quarries supply HSA material to England - particularly to adjoining parts of the West Midlands. In the rest of South Wales, the picture is affected by the much smaller size of most of the individual planning authorities, Historical crushed rock sales in South Wales have been concentrated within Cardiff, Carmarthenshire, Bridgend, Vale of Glamorgan, Rhondda Cynon Taf and the Brecon Beacons National Park (which is where most of the larger Carboniferous Limestone quarries in South Wales are located), in the adjoining LPAs of Caerphilly and Neath Port Talbot, where additional HSA sandstone quarries are located, and in Pembrokeshire, where there is a mixture of limestone, igneous and slate quarries.
- B11. Significantly, there has been no crushed rock production, during the baseline period, within Swansea, Torfaen or Newport, and very little in Monmouthshire. In the case of Torfaen and Newport this is a reflection of the very limited outcrop of suitable resources, although Carboniferous Limestone was formerly extracted from Penhow Quarry in Newport. In the case of Swansea, the limestone resources are plentiful but are either within the Gower AONB or constrained by existing urban development. Swansea does, however, have relatively unconstrained resources of HSA sandstone. In Monmouthshire, permitted reserves of Carboniferous limestone remain at Ifton Quarry, though this is currently inactive and has been since at least the time of the First Review. Further observations on the relationships between production, resources, markets and environmental capacity within each of the sub-regions are given in paragraphs B30 *et seq.*, below.

#### Marine-dredged Aggregates

- B12. As noted above, in South Wales, the availability of marine-dredged sand & gravel is of major importance, with supplies being sourced from both Welsh and English waters within the Severn Estuary and the Bristol Channel. Over the 2007 to 2016 baseline period, marine aggregate landings within South Wales accounted for an average of almost 83% of total sand & gravel production, and 9.1% of total primary aggregate production. In south-east Wales (i.e. the Cardiff City and Former Gwent sub-regions), marine-dredged material is the only source of sand & gravel currently available, though it is understood that some commercial exploration work has recently been undertaken of potential resource blocks identified in an earlier study for Welsh Government by Thompson *et al* (2002).
- B13. Discussions with BMAPA in 2019 suggest that similar levels of marine aggregates production are likely to continue in future years, in line with the current Interim Marine Aggregates Dredging Policy (IMADP).
- B14. For the time being, it seems reasonable to suppose that marine-dredged aggregates will continue to supply a similar proportion of overall demand as they have done over the last decade, so the demand for land-won aggregates in any of the LPAs in South Wales is not likely to be affected.

#### Secondary Aggregate Production

- B15. Secondary aggregates comprise the by-products of various industrial processes, including metallurgical slags and power station arisings, but also the by-products from certain types of non-aggregate mineral extraction, such as colliery spoil and slate waste, and from the recycling of glass, ceramics, asphalt planings and rail ballast<sup>3</sup>.
- B16. Aggregate production from metallurgical slags has traditionally been an important source of secondary aggregate within South Wales. Port Talbot continues to produce both blast furnace (iron) and steel slag, whilst electric arc furnace steel slag is still produced from one site in Cardiff. The processing of older stockpiles of blast furnace slag at the former Llanwern steel works is now understood to have ceased. Secondary aggregates are produced from all of these materials

<sup>3</sup> it might appear more logical to group these substances with other recycled materials from construction, demolition and excavation wastes (CD&EW). However, the coverage of CD&EW is already well defined in terms of survey returns, so those items are included here as secondary aggregates.

although volumes are thought to be declining, placing increased pressure on primary aggregate sources.

- B17. Coal-fired power station arisings, comprising pulverised fuel ash (PFA) and furnace bottom ash (FBA) are currently produced only at the Aberthaw Power Station. With the planned closure of all coal-fired power stations by 2025, this production will cease. Whether or not historic PFA stockpiles will be able to be worked in future remains to be seen.
- B18. Small amounts of aggregate minerals (sandstone and occasionally sand) arise adventitiously from the reworking of former colliery spoil tips or from the working of opencast coal. In South Wales, significant quantities of colliery spoil still exist in tips that have not been removed or landscaped under the Derelict Land Reclamation Scheme (and successors). The overall potential for producing aggregate from this material is small, however, for a combination of local (social and planning), fiscal and regulatory reasons, but could be locally significant, where the quality of the material is suitable for the end-uses required. Planning permission for the reworking of former tips exists at Tower Colliery (RCT) but is not being actively exploited at present. Reworking of the spoil from the former opencast workings at Tir Pentwys (straddling the border between Torfaen and Blaenau Gwent) has also been considered and is the subject of Preferred Area allocations in both authorities. A planning application for reworking the Torfaen part of the Tir Pentwys site was the subject of a recent Public Inquiry, but the Appeal was dismissed in August 2019, on the basis of impacts of the proposed access route on an area of Ancient Woodland. Unless and until an acceptable alternative means of access is provided, this renders the resources within that Preferred Area unworkable, and also precludes access to those on the Blaenau Gwent side.
- B19. Sandstone arisings from new opencast workings have been important as 'windfall' resources at a number of sites within the South Wales coalfield, but these are classed as primary aggregates and are therefore not considered further here.
- B20. Slate waste is produced in very small quantities in South Wales, from the northern part of the Pembrokeshire Coast National Park and in southernmost Ceredigion. However, the extent to which this resource has been utilised as aggregate is understood to be minimal, and the prospects for future utilisation are equally limited. Mention was made in the original RTS of the possibility of importing secondary aggregates from the much greater quantities of higher quality slate waste in North Wales, though this was also seen as a 'remote' prospect and no progress has since been made.
- B21. The various sources of secondary aggregate noted above, together with recycled aggregates, as discussed below, are currently exempt from the Aggregates Levy, in a deliberate attempt to minimise the use of primary aggregates. During 2019 and 2020, the Aggregates Levy was comprehensively reviewed by HMRC, but no changes have been made to those exemptions.

### Recycled Aggregates

- B22. Aggregates produced from construction, demolition and excavation wastes (CD&EW) form an important contribution to the overall consumption of construction aggregates. The 2008 RTSs noted a total output for the whole of Wales of 3.97mt, based on 2005 survey data, and suggested a roughly 3 to 1 split between South Wales and North Wales, based on earlier surveys and population ratios. They also noted that, despite the lack of quantitative detail, it is inevitable that the greatest volumes of CD&EW arisings and usage are in the urban areas. The RTS documents emphasised, however, that all statistics for this sector need to be used with a high degree of caution, because of the low rate of response to the surveys.
- B23. The situation, in terms of available data, has not improved since the original RTSs were published. No new survey data is available, other than a C&D Waste survey in 2012, so any observations on recent or future trends can only be regarded as broad approximations. If anything, the efficiency of recycling is likely to have increased, and the introduction of WRAP's (2005) 'Quality Protocol' for the production of aggregates from inert waste may have increased the proportion and usage of higher value products derived from the various recycled sources. Such improvements, however, represent only small increments on the progress which had previously been made - primarily as a consequence of the price advantages resulting from the landfill tax and, to a lesser extent, the aggregates levy. The view of the Mineral Products Association (MPA), which is not disputed by the NRW, remains that there is limited opportunity

for significant further increase in the proportion of construction aggregate likely to be derived from this sector. As noted earlier, the future availability of recycled aggregates seems likely to be inextricably linked to the overall rates of construction activity and economic growth, so the safest assumption is that it will rise and fall in a very similar way to overall demand, and will thus have a neutral impact on the demand for primary aggregates, compared to the baseline period (2007 to 2016).

### Imports and Exports

- B24. Wales has always been a net exporter of land-won aggregates. Data on both exports and imports is recorded in the periodic Aggregate Minerals (AM) Surveys, and data for exports in the last four surveys is summarised in Table B2, below.

**Table B2: Summary of key export statistics for South Wales from recent AM surveys**

<i>Note: all figures exclude sales for non-aggregate use</i>	<b>AM2001</b> (mt)	<b>AM2005</b> (mt)	<b>AM2009</b> (mt)	<b>AM2014</b> (mt)
(data from Table 4j of the AM reports)				
Land won Sand & Gravel Sales	0.115	0.304	0.144	0.205
S&G Exports*	0.001	0.011	0	0
<b>South Wales S&amp;G Exports as % of S&amp;G total</b>	<b>1%</b>	<b>4%</b>	<b>0%</b>	<b>0%</b>
Limestone Sales	6.536	6.137	4.554	4.540
Limestone Exports*	0.262	0.154	0.052	0.332
<b>Exports as % of Limestone total</b>	<b>4%</b>	<b>3%</b>	<b>1%</b>	<b>7%</b>
Igneous Sales	0.838	1.238	1.025	1.577
Igneous Exports*	0.572	0.430	0.694	0.829
<b>Exports as % of Igneous total</b>	<b>68%</b>	<b>35%</b>	<b>68%</b>	<b>53%</b>
Sandstone Sales	2.648	3.498	2.605	1.709
Sandstone Exports*	1.457	1.941	1.258	0.852
<b>Exports as % of Sandstone total</b>	<b>55%</b>	<b>55%</b>	<b>48%</b>	<b>50%</b>
Total Crushed Rock Sales**	10.310	10.873	8.185	7.825
Total CR Exports*	2.302	2.527	2.003	2.013
<b>South Wales CR Exports as % of CR total</b>	<b>22%</b>	<b>23%</b>	<b>24%</b>	<b>26%</b>

\* 'exports' are primarily to England but include some movement between South Wales and North Wales.

\*\* Unlike the figures used elsewhere in this Review, crushed rock sales in the AM reports exclude slate

- B25. In South Wales, the main export in terms of overall tonnage is of sandstone, the vast majority of which is High Specification Aggregate (HSA) - skid-resistant road surfacing material with a Polished Stone Value (PSV) of 58 or above, and generally much higher (Thompson, Greig & Shaw 1993; Thompson *et al.*, 2004).
- B26. In 2002, the total output of HSA sandstone from South Wales was 1.280mt<sup>4</sup>. This amounts to some 88% of the previous year's (AM 2001) figure of 1.457 for all sandstone exports from South Wales (the difference representing the change from 2001 to 2002 and the inclusion of some non-HSA sandstone in the latter figure). Of the total HSA sandstone output from South Wales in 2002, some 69% is known to have been exported to England, with the remaining 31% being utilised in Wales, (including domestic consumption within South Wales and exports to North Wales). Of the total HSA sandstone exported, most was supplied from five quarries and two opencast sites in the Pennant Measures of the South Wales coalfield (from which 58% of HSA output was exported to England in 2002); whilst the remainder was sourced from three HSA sandstone quarries in Powys (from which a much higher proportion - 88% - was exported to England).

<sup>4</sup> Source for this and subsequent data on High Specification Aggregates: unpublished information collated by the author as part of the Capita Symonds' analysis of High Specification Aggregates production in 2002 (Thompson *et al.*, 2004).

- B27. Reference to Table B2 shows that, although there was a reduction in sandstone exports between 2005 and 2009, the difference is much less marked than was the case for Wales' other main aggregate export – limestone from North Wales (see Appendix A), especially in percentage terms. This reflected the fact that the market for skid-resistant road aggregate held up better, during the recession of 2007 and 2008, than had been the case for more general-purpose limestone aggregate (presumably because of the safety imperative of continuing to maintain skid resistance on major roads). However, whilst the North Wales limestone exports had largely recovered by the time of the AM 2014 survey, HSA sandstone exports from South Wales continued to decline, as did the overall sales of these materials. The explanation for this decline is not clear. It may at least partly have been due to a marked reduction in production capacity from some of the major HSA quarries in South Wales over this period: Cribarth Quarry closed in 2014, following a number of years of declining output as permitted reserves were used up; Gelligaer Quarry was inactive between 2012 and 2015; and Hafod Fach Quarry has been inactive since 2015. There does also seem to have been a fall in demand, however, as seen in the steadily declining outputs from Cwm Nant Lleici Quarry, from 2007 to 2014 (Thompson, 2015). If similar trends occurred at other active HSA units, it may reflect the relatively low priority given to road construction and maintenance, since the recession, by comparison with the more focused spending on house building.
- B28. Imports of land-based aggregates are very minor, by comparison with exports. In South Wales in 2014 (from Table 5j of the AM 2014 survey report), land-based imports amounted to 0.042mt of sand & gravel and 0.079mt of crushed rock, primarily limestone from South West England. These compare with imports of 0.064mt of sand & gravel and 0.172mt of crushed rock in the previous (AM 2009) survey.
- B29. Imports and exports of marine-dredged sand and gravel between England and Wales are only relevant to the RTS apportionment exercise if they affect the continuity of supply of these materials to Wales and thus give rise to increased demand on land-based resources. This is potentially an issue in South East Wales which, as noted earlier, is heavily dependent upon marine aggregates. At the time of the First Review, Wales was a net importer of marine sand & gravel, dredged from the English side of the median line in the Bristol Channel and the Severn Estuary. This was noted in the Review as being likely to change, subject to the approval of new licence applications within Welsh waters. By 2019, the relative balance between imports and exports has shifted as a consequence of a new licence that has been recently permitted across the median line between English and Welsh waters. However, significant trade continues from English licences to Welsh markets as well as vice versa. In Liverpool Bay, the only licence area in Welsh waters remains a net exporter to north west English markets.

### ***Sub-Regional Analysis***

- B30. In the First Review, the sub-regional analysis for South Wales was based on three broad areas: Mid Wales, South West Wales and South East Wales. In this review, as explained earlier and as illustrated in Figure B1, above, it is based on five smaller areas, each one being intended to approximate a relatively 'self-contained' market area for aggregate production and sales, with little movement of aggregate taking place between adjoining areas, other than exports to England.
- B31. Maps corresponding to each of these areas are presented in Figures B2 to B11 below. For each sub-region there are three maps. The first one shows the distribution of aggregate resources and existing quarries. The second map, at a smaller scale, deals with 'proximity' issues (i.e. the relationships between resources, quarry locations, major roads and the distribution of both planned housing requirements in each LPA and existing urban areas). Planned housing requirements are used in preference to the population density maps that were used in the First Review, although both distributions are shown, for comparison, in Figures 4.7 and 4.8 of the main document. The third map for each sub-region then deals with environmental capacity issues, utilising output from the earlier IMAECA analysis (Enviros, 2005). All of the larger maps are presented at the same approximate scale, as are all of the smaller maps (as indicated in each case by the 30km scale bar).
- B32. It must be emphasised that these maps show only resources and not permitted reserves. **Resources** are geological materials, including rocks and naturally occurring sand & gravel, which have the potential to be used for a particular purpose (in this case as construction

aggregates). **Permitted Reserves** are those parts of a resource which are known to be suitable for this purpose (usually as a result of detailed ground investigations and laboratory testing) and which have valid planning permission for the winning and working of the materials in question. The outlines of permitted reserves are not shown on the maps.

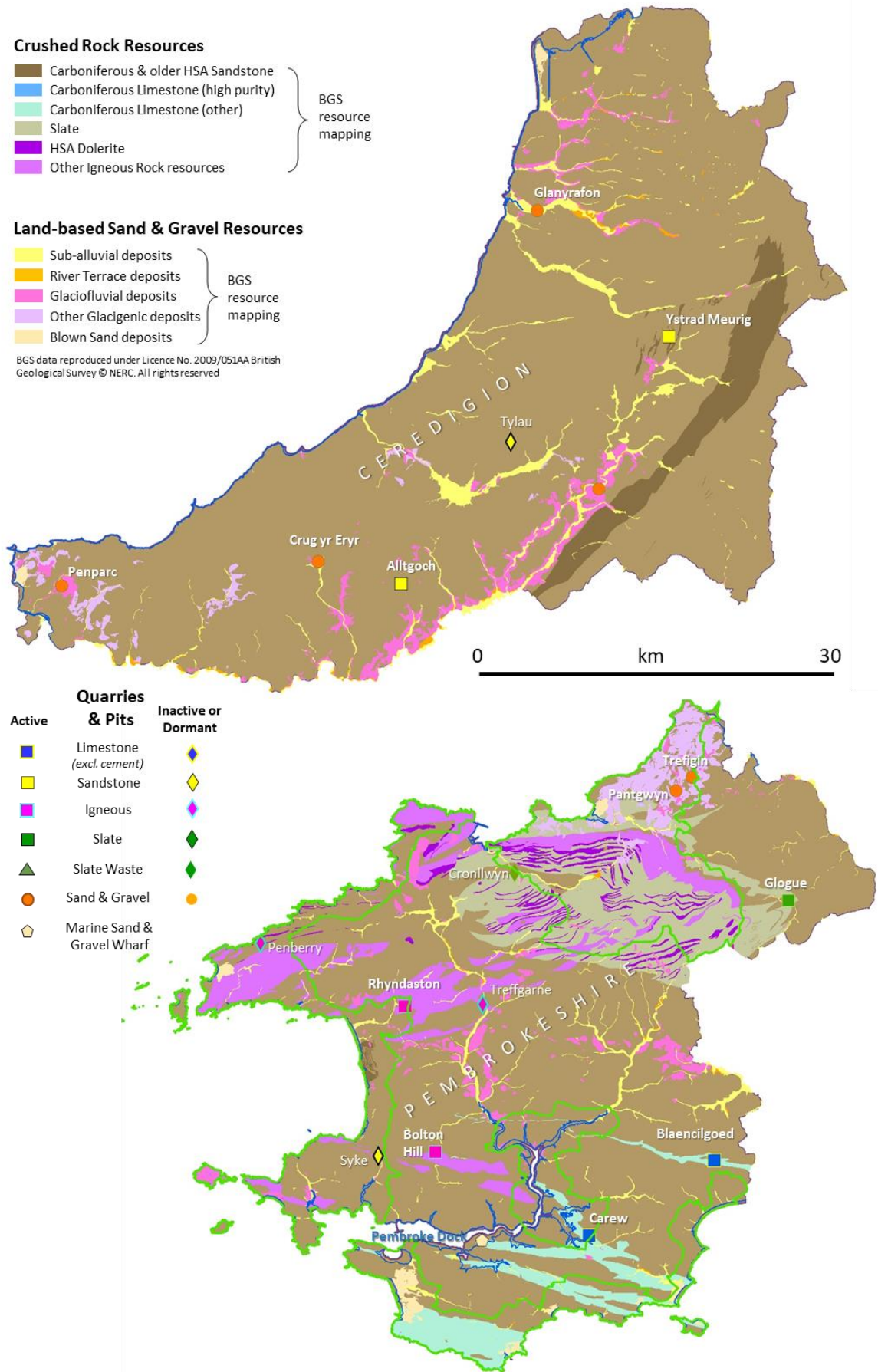
- B33. The resources are illustrated in several main categories. Natural **sand & gravel resources**, as mapped by the British Geological Survey (BGS) may be associated with five different types of 'superficial' deposits, as shown on the key to each map, though the extent of workable mineral within these deposits is highly variable. Some of the maps show an additional category of sand & gravel resource blocks that were identified in more detailed study for the Welsh Assembly by the former Symonds Group. These were identified primarily in terms of reconnaissance-level mapping of Quaternary geology and geomorphology, supported by very limited borehole investigations (Thompson *et al*, 2000), and were examined further in a comparative environmental assessment of both marine and land-based resources (Thompson *et al*, 2002). The resource blocks are shown by the deep red shading on the maps for the Swansea, Cardiff and Former Gwent areas.
- B34. **Crushed rock resources** within the area comprise Carboniferous (and older) HSA sandstones (i.e. those which are generally suitable for use as High Specification Aggregates – HSA – for use in skid-resistant road surfacing); Carboniferous Limestones (which are subdivided, on the larger maps, into high purity (>97% CaCO<sub>3</sub>) and other limestones); Igneous Rocks (including HSA dolerites, which are differentiated on the larger maps); and Slates.
- B35. The quarries shown on the maps are categorised in the same way as the resources. They include both active and inactive units (as of 2018), the latter including a small number of dormant sites and one suspended permission. Separate listings of all active, inactive and dormant (or suspended) sites in South Wales are given in Tables B3, B4 and B5, respectively.

#### West Wales Sub-Region

- B36. Figure B2, below illustrates the distribution of quarries and land-based aggregate resources within West Wales. For ease of presentation, Ceredigion is shown separately to Pembrokeshire and the Pembrokeshire Coast National Park. The crushed rock resources comprise:
- **Silurian and Ordovician HSA sandstones**, currently worked at Ystrad Meurig and Alltgoch quarries in Ceredigion, respectively;
  - a wide variety of **igneous rocks**, including quartz diorite worked at Bolton Hill in Pembrokeshire and volcanic rhyolite, worked at Rhyndaston Quarry, just inside the National Park;
  - **Ordovician slates**, currently worked only at Glogue Quarry in Pembrokeshire; and
  - **Carboniferous Limestone**, worked at Blaencilgoed (a.k.a. Gellihallog Quarry) in Pembrokeshire and at Carew, just inside the National Park.
- B37. In addition, there are extensive **glacial** and **glaciofluvial sand & gravel** deposits around Cardigan, straddling the boundaries between the National Park (Trefigin and Pantgwyn Quarries), Pembrokeshire and Ceredigion (Penyparc Quarry). Glaciofluvial deposits are also present along the Teifi valley in Ceredigion (currently worked at Pant Quarry), and in more localised areas elsewhere (including Crug-yr-Eryr Quarry, in Ceredigion). **Alluvial sand & gravel** is also worked, on a very small scale, in the Rheidol valley at Glanyrafon in Aberystwyth.
- B38. Figure B3 illustrates the relationships of these quarries and resources to issues relating to the likely pattern of demand (as indicated by proximity to existing urban areas, planned housing requirements and the primary road network); and issues relating to environmental capacity.
- B39. Most if not all of the quarries are thought likely to serve markets which lie primarily within the West Wales sub-region. This is not least because of the distance of most of them from other markets further north and east, the limited road connections across the Cambrian Mountains in mid-Wales and the existence of other quarries closer to those other market areas. Within the sub-region, some of the quarries are well-placed in relation to local centres of demand, for example around Pembroke, Haverfordwest and Cardigan, whilst others are located in more distant, rural locations, as dictated by the available resource outcrops.

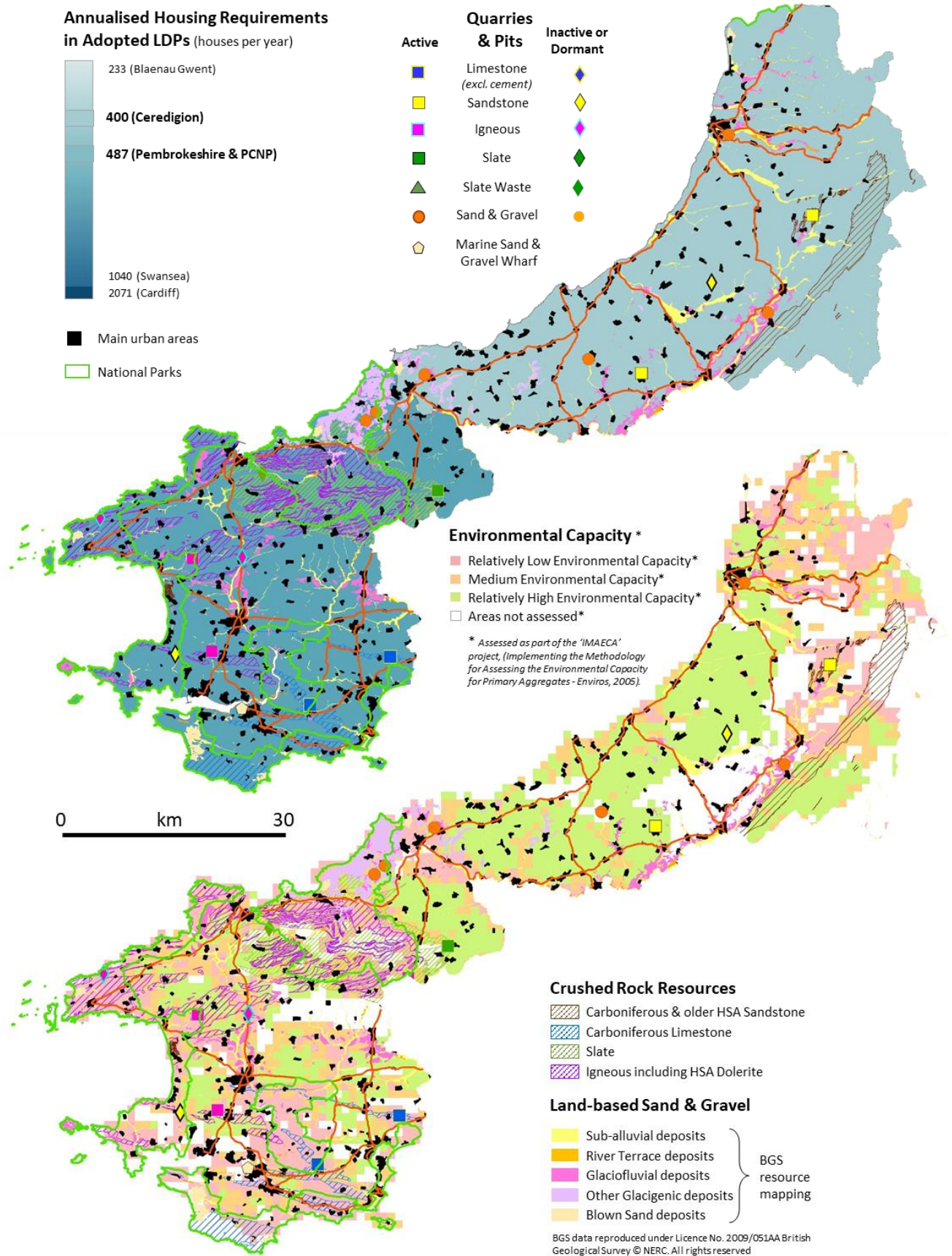
- B40. Overall, there is limited justification for changing the existing pattern of supply, from a proximity point of view. There is more justification in seeking changes from an environmental perspective – particularly in order to encourage a shift of production, in future, away from the National Park. This would require increased output (and/or new sources to be established) in other areas – particularly in Ceredigion which, as noted in the main report, does not currently supply aggregates in proportion to its share of sub-regional housing requirements.
- B41. In the case of sand & gravel production, potential opportunities (in terms of resources) exist within Ceredigion, both close to Cardigan (though these are generally in areas of relatively low environmental capacity) and further upstream along the Teifi valley (where environmental capacity has not been assessed). Additional resources also occur on the opposite side of this valley in neighbouring Carmarthenshire, and it would be sensible for these to be included in the search for opportunities. In this regard, the First Review of the RTS suggested that there would be merit in developing a combined approach to future apportionments and allocations between Pembrokeshire, Ceredigion and Carmarthenshire. Although Carmarthenshire is in a separate sub-region (primarily because of the market for crushed rock in the Swansea area), it is recommended that these joint working arrangements should continue, with regard to sand & gravel.

**Figure B2: Aggregate Resources and Quarries in the West Wales Sub-Region**





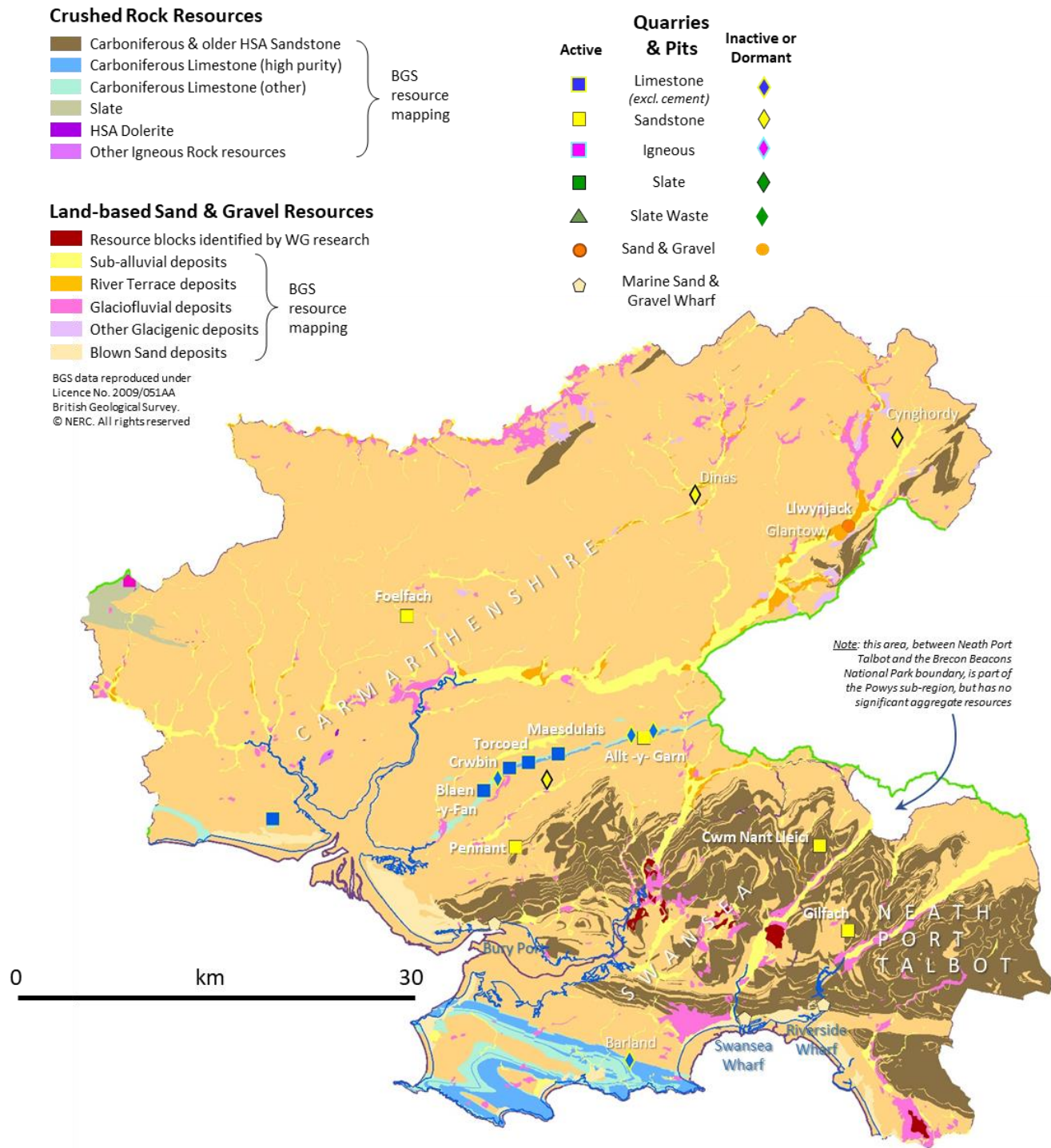
**Figure B3: Aggregate Resources, Quarries, Planned Housing Requirements and Environmental Capacity in the West Wales Sub-Region**



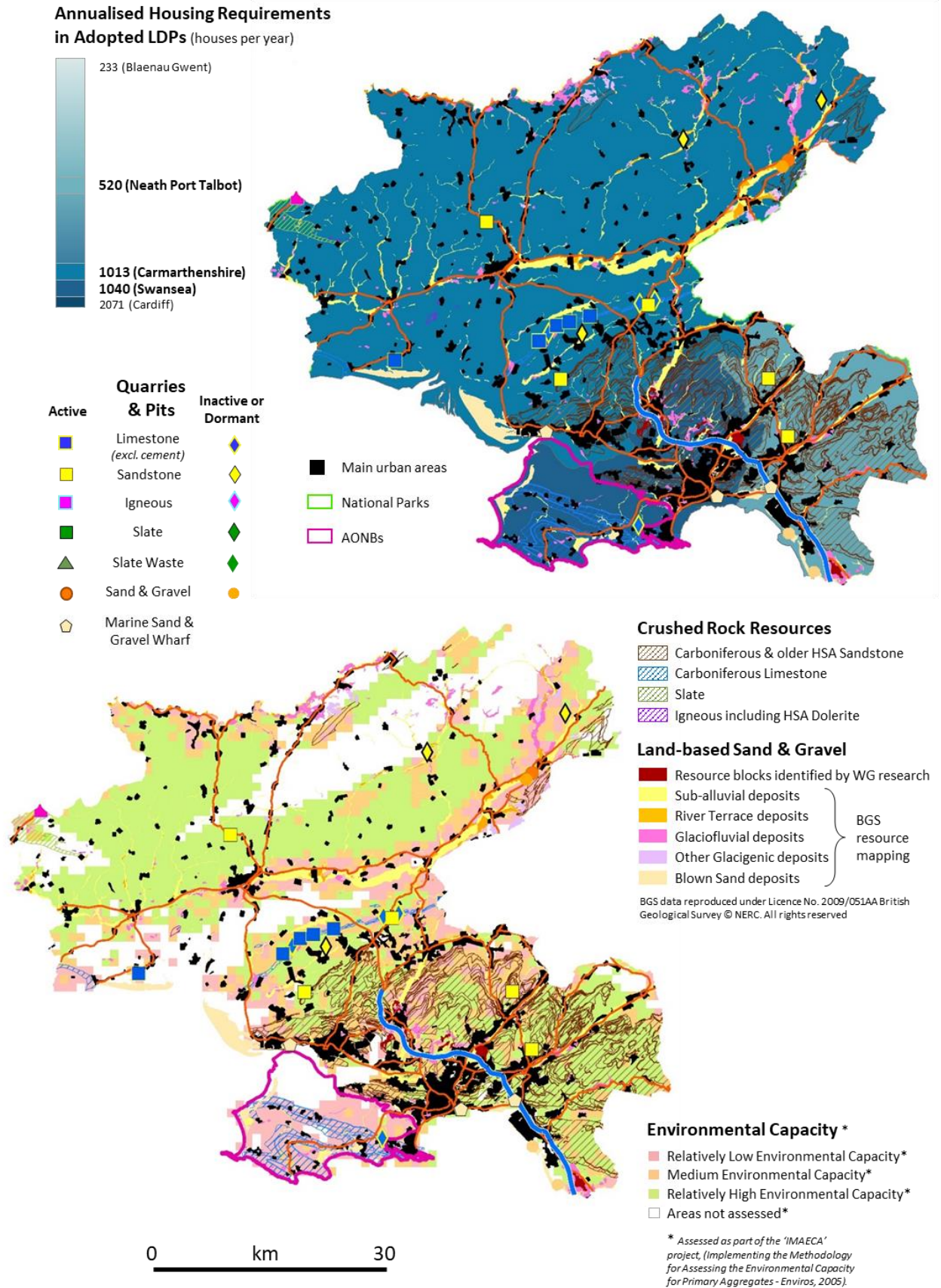
Swansea City Sub Region

- B42. Figure B4 illustrates the distribution of quarries and land-based aggregate resources within the Swansea City sub-region. In this area, the rock resources are mostly confined to the southern part of Carmarthenshire and to Swansea and Neath Port Talbot. They comprise:
- **Carboniferous Limestone**, currently worked at several quarries along a narrow outcrop in southern Carmarthenshire, with a more extensive outcrop in the Gower Peninsula (almost all of which lies within the Gower Area of Outstanding Natural Beauty and is thus most unlikely to be worked);
  - **Carboniferous HSA sandstone**, currently worked predominantly at Cwm Nant Lleici and Gilfach quarries in Neath Port Talbot, and on a much smaller scale, at Pennant Quarry in Carmarthenshire, but extending though all areas in between, including Swansea itself;
  - **Silurian sandstone**, currently worked only at Foelfach, in Carmarthenshire
  - Small, isolated outcrops of **igneous rocks**, only one of which (at Garn Wen in western Carmarthenshire) is currently worked; and
  - **Ordovician slates**, in the same area of western Carmarthenshire, which are not worked at all.
- B43. In addition, there are **glaciofluvial sand & gravel** deposits in various parts of sub-region, including a number of potential resource blocks identified by the Symonds Group study for Welsh Assembly (Thompson *et al* 2000). At present, however, the only operational site is a very small, intermittently active area of river gravel extraction at Llwynjack in the Tywi valley.
- B44. Figure B5 illustrates the relationships of the various resources and quarries to issues relating to the likely pattern of demand (as indicated by proximity to existing urban areas, planned housing requirements and the primary road network); and issues relating to environmental capacity. As can be seen from these maps, the limestone quarries appear to be reasonably well-placed (given the distribution of unconstrained resources) in terms of their proximity to Swansea and adjoining urban areas. A number of inactive quarries are also present along the same narrow limestone outcrop in Carmarthenshire, close to four of the currently active sites, implying that there would be scope for increasing supplies from this area if demand were to increase. Given the constraints which apply to virtually all other limestone outcrops in the area, there would be no opportunity to change the overall pattern of limestone supply.
- B45. The Carboniferous HSA sandstones within the area primarily comprise those of the westernmost part of the South Wales Coalfield (i.e. the 'Pennant' Sandstones) and are highly sought-after as premium, skid-resistant road surfacing aggregates. The two main operational quarries (Gilfach and Cwm Nant Lleici) export to England, as well as supplying local markets. In the case of Cwm Nant Lleici, more than 50% of the output is distributed by rail, with a much lower proportion being transported by rail from Gilfach. The location of both quarries, within the eastern part of the sub-region, and close to the Neath Abbey railhead, is therefore sensible, from a proximity point of view. Gilfach is also within an area of high environmental capacity, as are most of the unworked resources in Neath Port Talbot, though that is not the case for Cwm Nant Lleici.

**Figure B4: Aggregate Resources and Quarries in the Swansea City Sub-Region**



**Figure B5: Aggregate Resources, Quarries, Planned Housing Requirements and Environmental Capacity in the Swansea City Sub-Region**



- B46. As noted in the main document, there would be some merit in seeking to redistribute future HSA sandstone within the region, in order to provide a more equitable distribution between Neath Port Talbot and Swansea (which has the same resources but no current production and, hitherto, no apportionments). This would, potentially, enable advantage to be taken of Pennant Sandstone outcrops within Swansea that are located in areas of relatively high environmental capacity (for example close to Junction 44 of the M4, south of Pontardawe, or between Pontardawe and Pontarddulais). In both cases, however, those outcrops lie within a higher part of the Pennant Sandstone sequence, known as the Swansea Beds, which have not, hitherto, been worked on a modern commercial scale and which may be of inferior quality in terms of aggregate properties and/or the continuity and thickness of sandstone units. The suggestion would require further detailed investigations before it could be relied upon.
- B47. In the RTS First Review it was noted that there might also be merit in deliberately seeking to change the existing supply pattern by reducing future output from Neath Port Talbot and increasing that from other LPAs further east within the Pennant Sandstone outcrop (e.g. Rhondda Cynon Taf, Caerphilly, Torfaen or Blaenau Gwent), in order to reduce the transportation distances of HSA material that is exported to England by road, rather than rail. It must be remembered, however, that proximity is only one aspect of sustainability which must be balanced against many other factors. For example, a high proportion of the resource outcrop within Neath Port Talbot coincides with areas of high environmental capacity whereas such areas are more limited further east.
- B48. Older (Silurian) sandstones including the Yr Allt Formation (formerly known as the Bala Series Grits) occur in various parts of northern Carmarthenshire. These are now worked at only one active quarry in the county (Foelfach), and only to supply local markets.
- B49. Igneous rocks (Prescelly dolerite) are currently exploited in only one location, at Garn Wen in Carmarthenshire. The rock has a reasonably high PSV of 57 but not sufficient to qualify as High Specification Aggregate (HSA) and tends to be used as a more general purpose aggregate within the local market area. Other outcrops of igneous rock within the sub-region are confined to localised minor intrusions in the west of Carmarthenshire and are not likely to be seen as commercially viable resources.
- B50. In terms of land-based sand & gravel resources, as noted above these do exist within the sub-region and, although many of those within river valleys, especially, fall within areas of low environmental capacity, others appear to be better placed in this respect. These include resource blocks close to Swansea, identified in the Symonds Group study, and extensive glaciofluvial deposits within the Teifi valley, around Llanybydder in Carmarthenshire. The fact that none of these are being exploited at present suggests that there is insufficient demand and/or commercial interest, not least because of the ready availability of marine dredged sand from the Bristol Channel, which is landed at the Swansea, Riverside and Bury Port wharves (shown in Figure B4). This almost certainly diminishes the commercial prospects for working resources in Swansea, Neath Port Talbot, and much if not all of Carmarthenshire.

#### Powys Sub-Region

- B51. Figure B6, below, shows the distribution of resources and quarries within the county of Powys, excluding the Brecon Beacons National Park in the south, which forms part of a separate sub-region. In this area, despite the widespread occurrence of hard rock resources, those which are regarded as exploitable aggregate resources are far more limited and localised. This is, not least, because of the relatively remote and upland nature of the landscape which dictates that only those resources of exceptional quality and/or proximity to established markets, are actively worked. These comprise:
- **Precambrian HSA Sandstone**, of the Yat Wood and Strinds Formations, worked from very localised inliers at Gore, Dolyhir and Strinds quarries, close to the Herefordshire border, near Kington;
  - **Ordovician HSA sandstone**, of the Cribarth Formation – worked until recently at Cribarth Quarry, which closed in 2014 following the exhaustion of permitted reserves;
  - **Silurian HSA sandstone**, worked in only one part of the extensive outcrop of the Penstrowed Grits Formation, at Tan-y-Foel quarry, north-west of Newtown;

- **Ordovician HSA dolerite**, worked from a large but very localised intrusion at Criggion Quarry near Welshpool;
  - **Ordovician HSA igneous rocks** of the Llanellwedd Volcanic Formation, worked at the very large Builth Wells Quarry;
  - **Ordovician igneous rock**, worked from a localised intrusion within a predominantly shale quarry at Middletown, near Welshpool; and
  - **Devonian Old Red Sandstone**, worked on a very small scale, primarily for building stone, at Tredomen Quarry in the south of the area.
- B52. Limestone resources are largely absent within mid Wales, though a very small outcrop of Silurian limestone is worked alongside HSA sandstones at Strinds Quarry, close to the English border.
- B53. There are also **glaciofluvial** and **fluvial (river terrace and sub-alluvial) sand & gravel** deposits in various parts of sub-region, though none of these is currently exploited. The resources are mostly within the upper reaches of river valleys and are unlikely to offer much in the way of commercially viable opportunities - not least because of the widely dispersed population and hence limited local demand. One site that was previously worked, at Caerfagu, is now a suspended planning permission, with (effectively) no remaining reserves.
- B54. The emphasis in Powys is therefore very clearly on the production, and export to England, of High Specification (skid-resistant) Aggregates. With the exception of Builth and Tan-y-Foel, the HSA quarries exploit very localised geological outcrops. To varying degrees, similar material is likely to exist in adjoining parts of the same formations, but only within a few kilometres of those quarries. Tan-y-Foel is a relatively small quarry which exploits HSA sandstones from the Penstrowed Grits Formation. Whilst the outcrop of this formation is far more extensive, most of it is not suitable for commercial HSA quarrying because of the interbedded nature of the rocks, with the HSA sandstones alternating with largely unsaleable mudstones and shales. For this reason, the formation is not shown on Figure B6, or on B7 (which shows the relationship of the quarries and resources to factors relating to proximity and environmental capacity). Builth Wells Quarry exploits part of a much larger and variable outcrop of volcanic igneous rocks in central Powys. The extent to which similar (HSA) qualities will occur in other parts of those outcrops is not known, but the extremely large permitted reserves which remain at Builth render this immaterial.
- B55. Overall, the scope for significantly modifying the existing supply pattern of sandstone and igneous rock within central Powys is therefore extremely limited. There would be potential benefits to be gained, in terms of proximity, by limiting future planning permissions to resource outcrops closest to the English border, although those areas (around Criggion, Gore and Dolyhir quarries) are seen to have relatively low environmental capacity (in part, at least, because of the existing quarries).

**Figure B6: Aggregate Resources and Quarries in the Powys Sub-Region**

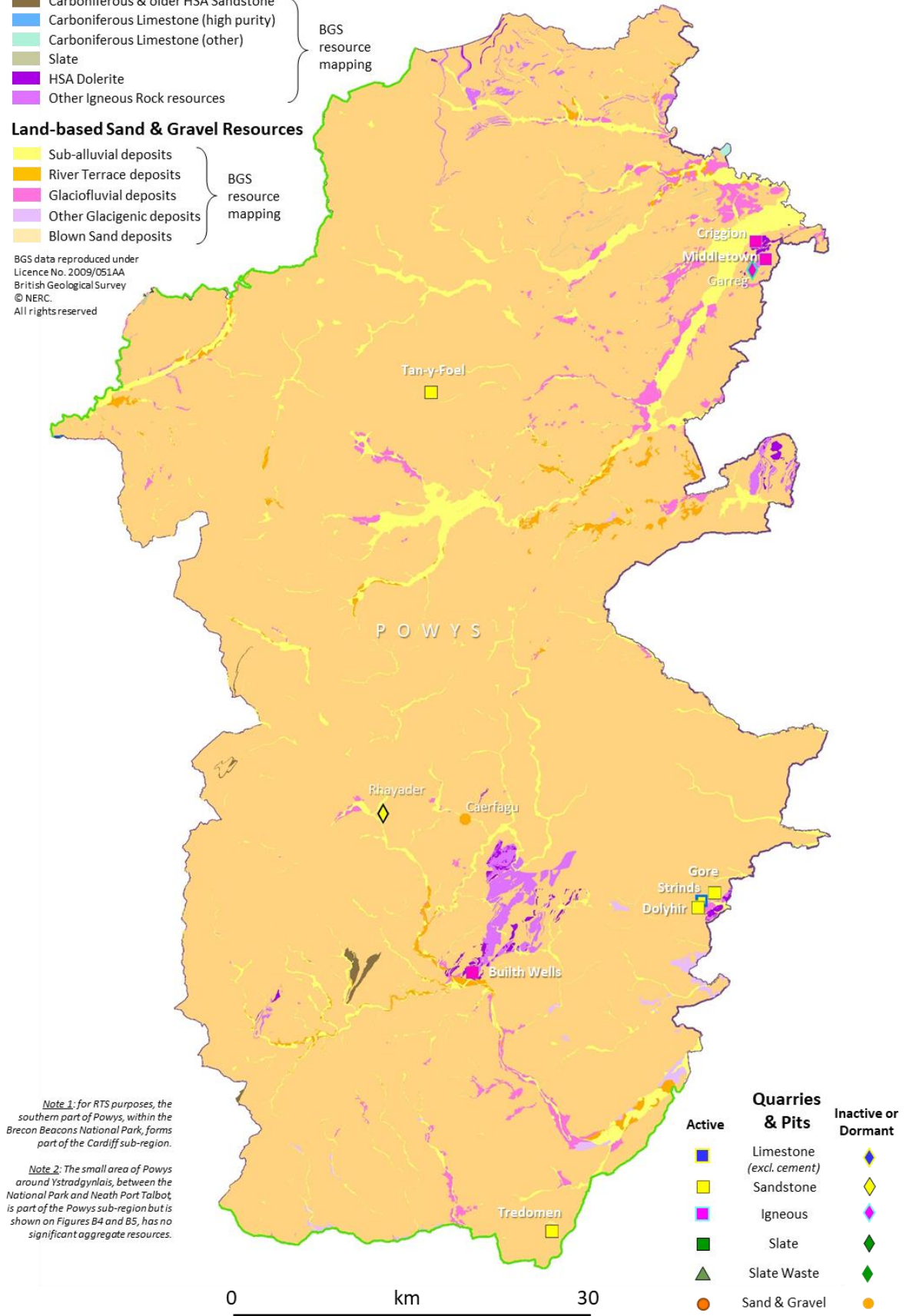
**Crushed Rock Resources**

- Carboniferous & older HSA Sandstone
  - Carboniferous Limestone (high purity)
  - Carboniferous Limestone (other)
  - Slate
  - HSA Dolerite
  - Other Igneous Rock resources
- BGS resource mapping

**Land-based Sand & Gravel Resources**

- Sub-alluvial deposits
  - River Terrace deposits
  - Glaciofluvial deposits
  - Other Glacigenic deposits
  - Blown Sand deposits
- BGS resource mapping

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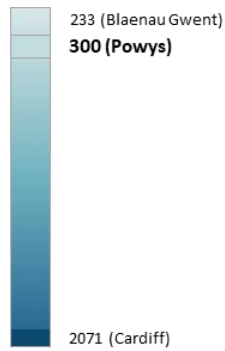
*Note 1:* for RTS purposes, the southern part of Powys, within the Brecon Beacons National Park, forms part of the Cardiff sub-region.

*Note 2:* The small area of Powys around Ystradgynlais, between the National Park and Neath Port Talbot, is part of the Powys sub-region but is shown on Figures B4 and B5, has no significant aggregate resources.

Quarries & Pits		Inactive or Dormant
Active	Limestone (excl. cement)	Inactive or Dormant
	Sandstone	
	Igneous	
	Slate	
	Slate Waste	
	Sand & Gravel	

**Figure B7: Aggregate Resources, Quarries, Planned Housing Requirements and Environmental Capacity in the Powys Sub-Region**

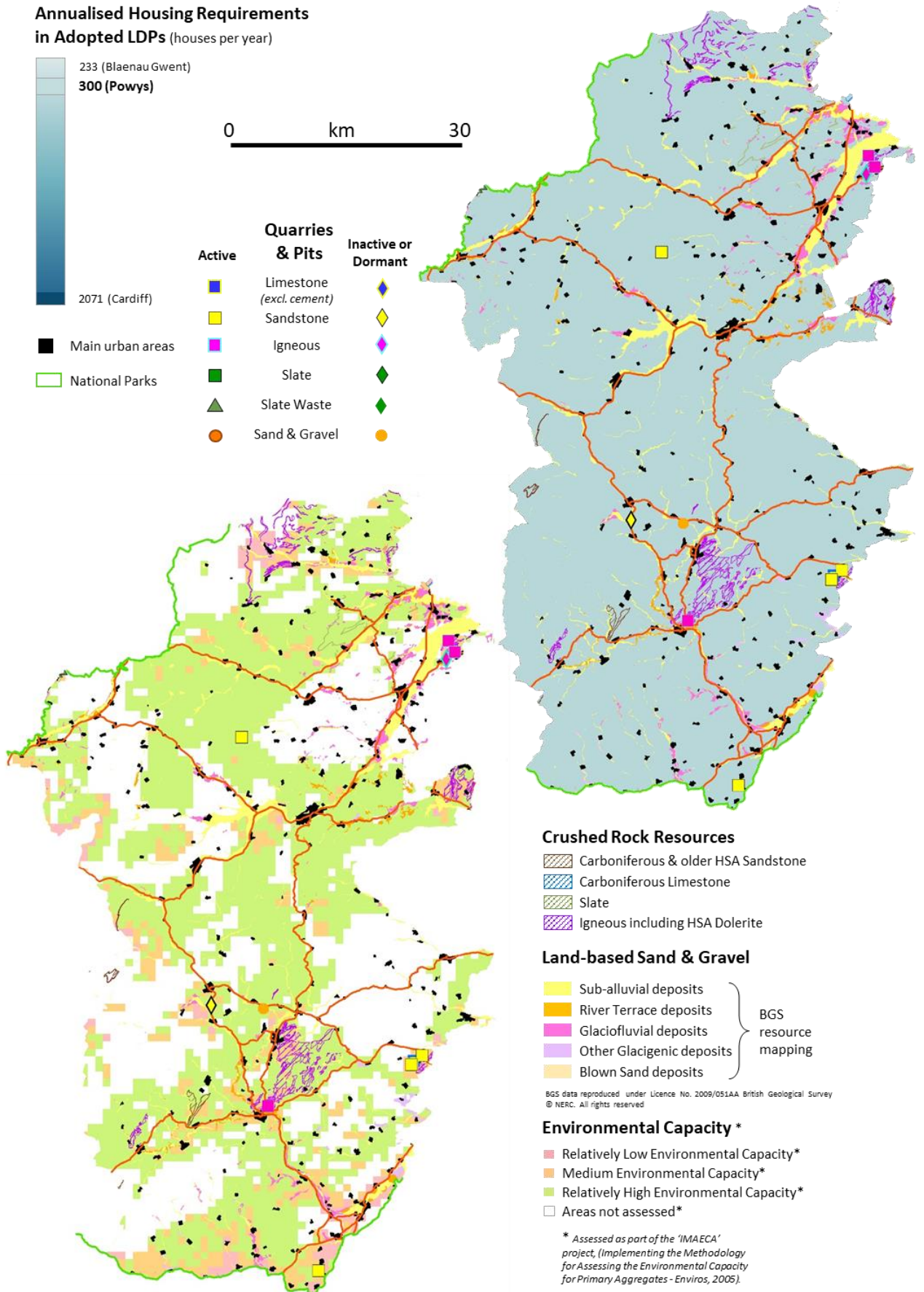
**Annualised Housing Requirements in Adopted LDPs (houses per year)**



0 km 30

- | Active |                          | Quarries & Pits | Inactive or Dormant |
|--------|--------------------------|-----------------|---------------------|
|        | Limestone (excl. cement) |                 |                     |
|        | Sandstone                |                 |                     |
|        | Igneous                  |                 |                     |
|        | Slate                    |                 |                     |
|        | Slate Waste              |                 |                     |
|        | Sand & Gravel            |                 |                     |

- Main urban areas
- National Parks



- Crushed Rock Resources**
- Carboniferous & older HSA Sandstone
  - Carboniferous Limestone
  - Slate
  - Igneous including HSA Dolerite

- Land-based Sand & Gravel**
- Sub-alluvial deposits
  - River Terrace deposits
  - Glaciofluvial deposits
  - Other Glacigenic deposits
  - Blown Sand deposits
- } BGS resource mapping

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- Environmental Capacity\***
- Relatively Low Environmental Capacity\*
  - Medium Environmental Capacity\*
  - Relatively High Environmental Capacity\*
  - Areas not assessed\*

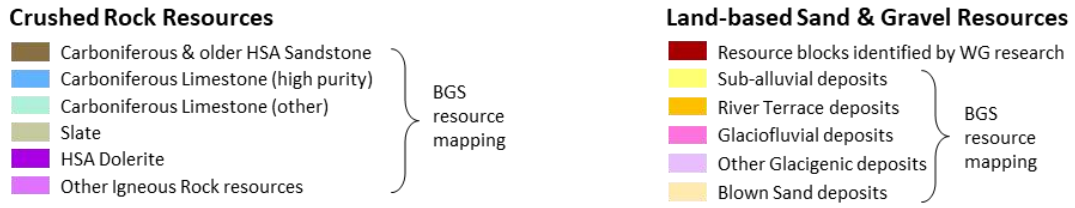
\* Assessed as part of the 'IMAECA' project, (Implementing the Methodology for Assessing the Environmental Capacity for Primary Aggregates - Enviro, 2005).



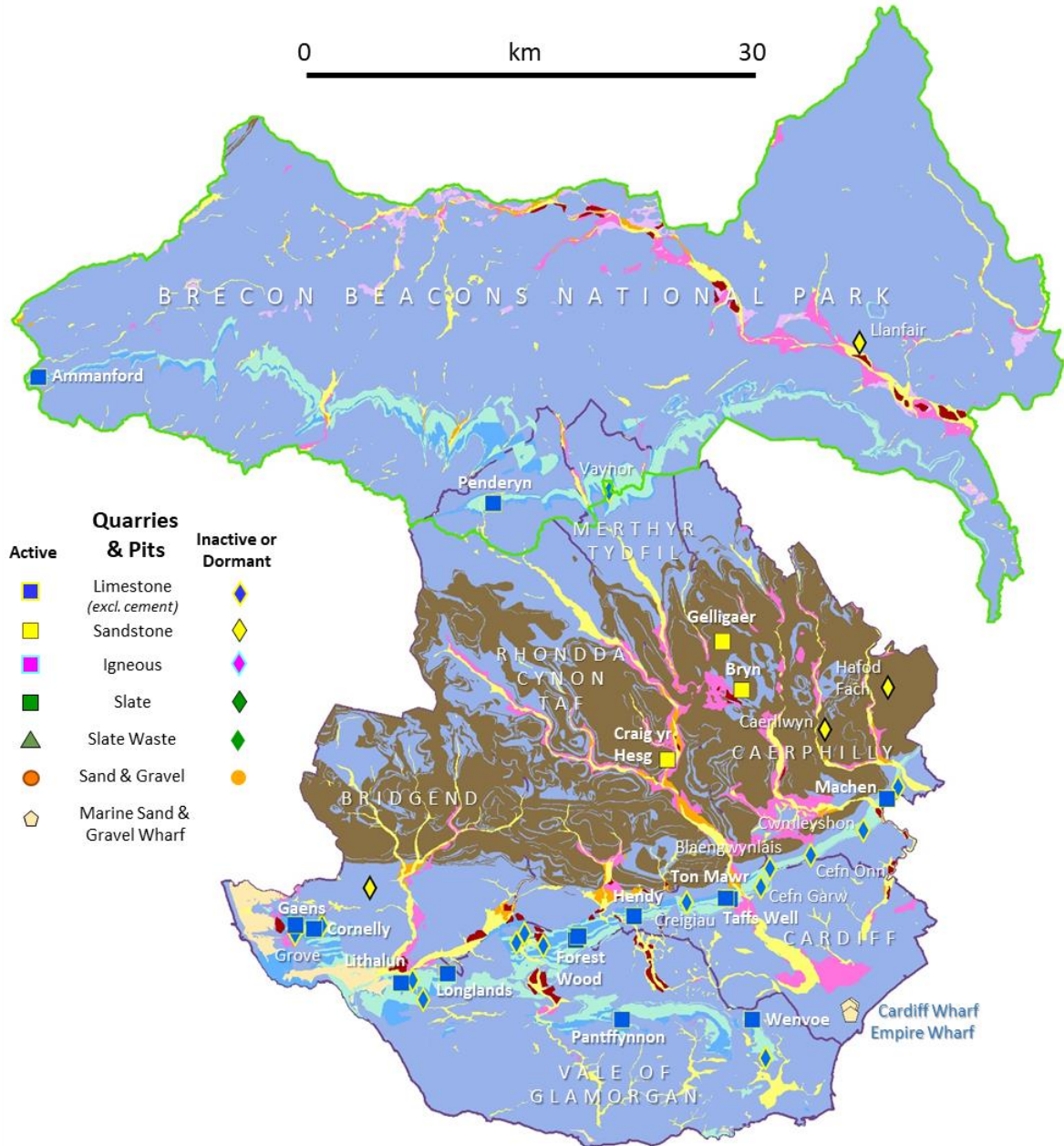
Cardiff City Sub-Region

- B56. This sub-region, as illustrated in Figures B8 and B9, below, comprises Cardiff, the Vale of Glamorgan and Bridgend, along with the valleys directly to the north in Rhondda Cynon Taf, Merthyr Tydfil and Caerphilly, and the Brecon Beacons National Park. The National Park is included primarily because of the major Carboniferous Limestone quarries of Penderyn (active) and Vaynor (currently inactive) which are located within or straddling the southern edge of the Park, and which primarily supply aggregates southwards into the valleys. Ammanford quarry, at the far western edge of the Park is anomalous in this regard, being associated primarily with the neighbouring Swansea sub-region, but its output is very small.
- B57. Crushed rock resources in this sub-region fall into just two, very clearly distinguished groups:
- **Carboniferous HSA sandstone** resources within the coalfield area which, like those to the west, are highly sought-after as sources of premium, skid-resistant road surfacing aggregates. They are exploited by a number of specialist quarries – Craig-yr-Hesg, Gelligaer, Bryn and Hafod Fach (currently inactive) which supply much of their output to England; and
  - **Carboniferous Limestone** resources, to the north and south of the coalfield, which are host to a large number of active and inactive quarries, focused primarily on the supply of general purpose construction aggregates into Cardiff and other centres of demand within the area.
- B58. **Land-based sand & gravel resources** have also been identified within the area, primarily within the valleys. However, many of these are either sterilised by existing urban development or lie within the National Park, and none are currently worked. Instead, the area is entirely dependent, for natural sand, on marine-dredged material from the Bristol Channel which is landed in Cardiff.
- B59. The Carboniferous ‘Pennant’ Sandstone quarries are generally well-placed, within the overall resource outcrop, to supply both local markets within SE Wales and to export HSA to England, though none of them is rail-connected. The sales, both for local consumption and exports, include end-uses other than skid resistant road surfacing, though this is usually because it is often convenient and economical to use the same aggregate in some of the lower layers of road construction as that which is required for use in the surface course.
- B60. Pennant Sandstone resources are widespread within the sub-region, where they coincide, to some extent, with areas of relatively high environmental capacity - particularly within parts of Bridgend, Rhondda Cynon Taf and Caerphilly. Whilst these areas are less extensive than those within Neath Port Talbot and Swansea in the adjoining sub-region (see para’s B45 to B47 above), they may, nevertheless offer prospects for future resource development, as indeed may those of lower apparent capacity - particularly in the case of extensions to existing quarries. In terms of proximity to export markets, these areas offer greater benefits than those further west, though there is less opportunity (if any) for access to railheads. These may be important factors when considering the pattern of future allocations, though this is not required at present within this sub-region (see Chapter 5 of the main document).
- B61. The Carboniferous Limestone resources within this sub-region occur in two distinct areas: the **north crop** (to the north of the South Wales coalfield); the **south crop** (to the south of the coalfield). Each of these areas is considered separately, below.
- B62. Within the north crop, the limestones occur almost entirely within the Brecon Beacons National Park and are currently (or have until recently been) worked at two main sites: Penderyn (within the National Park, in the northern part of Rhondda Cynon Taf); and Vaynor (north of Merthyr Tydfil, on the boundary of the National Park). Both of these sites are well-placed, in terms of proximity, to serve the densely populated valleys of the South Wales coalfield, with most of those areas being within 20 to 30km of the quarries. However, the location of the quarries within areas of low environmental capacity and wholly or partly within the National Park places major constraints on any future expansion. In the case of Vaynor Quarry, the adjoining resources outside the National Park are partially sterilised by other development and could not be developed as an extension of the existing quarry.

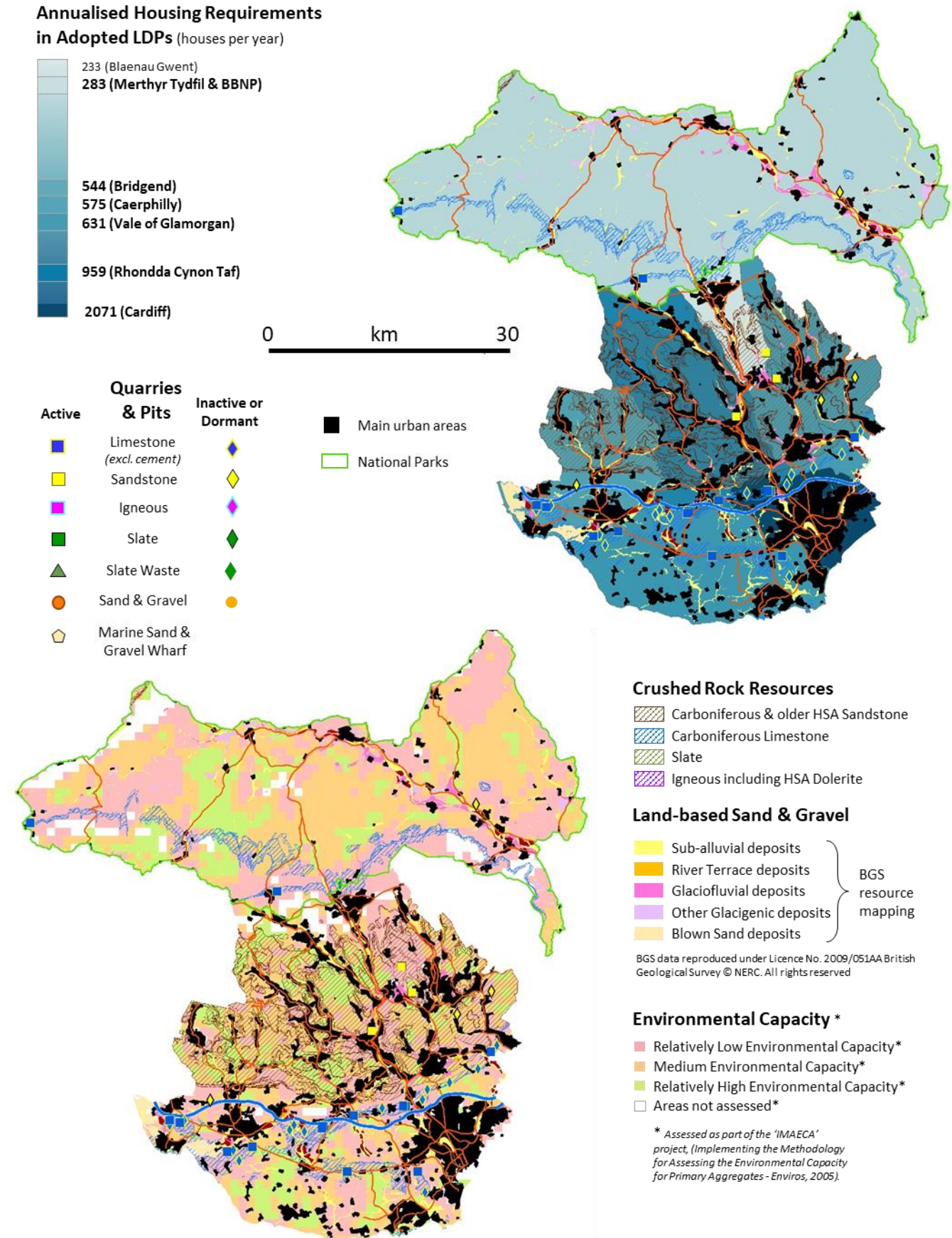
**Figure B8: Aggregate Resources and Quarries in the Cardiff City Sub-Region**



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**Figure B9: Aggregate Resources, Quarries, Planned Housing Requirements and Environmental Capacity in the Cardiff City Sub-Region**

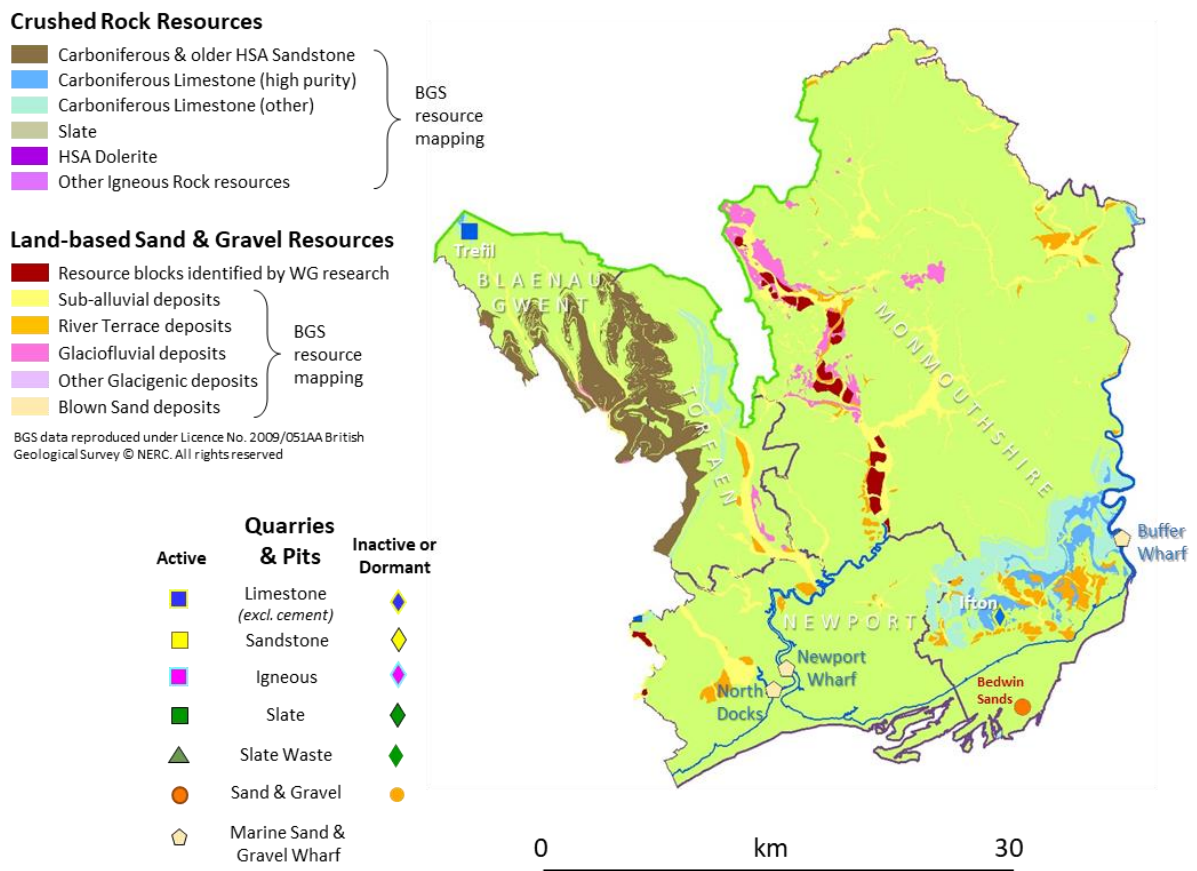


- B63. The second, and most important area of Carboniferous Limestone resource in the Cardiff City sub-region is that within the 'south crop', extending from Bridgend in the west, through the Vale of Glamorgan and Cardiff to Caerphilly in the east. No less than ten active limestone aggregate quarries are located in this area, although one of these (Cornelly) supplies industrial limestone, to the steelworks at Port Talbot, as well as aggregates. Most of these units are located close to the M4 motorway and, together, they are well-placed to supply most of the Cardiff city sub-region as well as the markets in Port Talbot to the west and Newport and Torfaen, to the east.
- B64. Almost all of the south crop resources fall within areas of relatively low environmental capacity (though these are less constrained than those within the National Park). Areas with higher capacity appear to be those in the southernmost part of Caerphilly, in the east, and around Cowbridge in the Vale of Glamorgan, further west. Either of those areas could potentially offer prospects for future resource development, though extensions to existing quarries within the area would be less disruptive and more likely to be preferred.
- B65. As noted above, there is currently no land-based sand & gravel extraction within the Cardiff City sub-region (or indeed within the whole of SE Wales), and this has generally been the case for decades. This is due in part to the ready availability of marine dredged sand from both the Severn Estuary and the Bristol Channel, but also reflects the environmental sensitivity of many of the inland areas which might contain potentially suitable resources. The situation is compounded by the lack of detailed knowledge of those resources (not least because there has been virtually no history of extraction). Reconnaissance-level surveys commissioned by the Welsh Assembly (Thompson *et al*, 2000, 2002) identified a series of potential resource blocks, which are shown by the deep red shading on the maps. Most of those in the Cardiff sub-region are located within the Brecon Beacons National Park, but others are located close to and south of the M4 motorway in the southern part of the area. Most of these fall within areas which have since been assessed as being of relatively low environmental capacity, though some of them, at least, may justify further investigation.

#### Former Gwent Sub-Region

- B66. Figures B10 and B11, below, illustrate the distribution of land-based aggregate resources, quarries and marine aggregate wharves within the former-Gwent sub-region (i.e. Blaenau Gwent, Torfaen, Newport and Monmouthshire).
- B67. As in the Cardiff sub-region directly to the west, the crushed rock resources in this area fall into two, very clearly distinguished categories:
- **Carboniferous HSA sandstone** resources within the eastern edge of the coalfield, in Blaenau Gwent and Torfaen. Like those in both Cardiff and Swansea sub-regions to the west, these provide sources of premium, skid-resistant road surfacing aggregates though, in this area, they have yet to be exploited as such; and
  - **Carboniferous Limestone** resources, which crop out in a very limited area in the north of Blaenau Gwent (where they are currently worked at Trefil Quarry); along a narrow, hitherto unworked outcrop at the eastern edge of the coalfield in Torfaen, largely sterilised by existing development; and over a much larger area in southern Monmouthshire (including the currently inactive Ifton Quarry). The latter outcrop extends into the eastern edge of Newport and was formerly worked at Penhow Quarry.
- B68. **Land-based sand & gravel resources** have also been identified within the area, primarily as glacio-fluvial, river terrace and sub-alluvial gravels within the Usk Valley, but also as terrace and sub-alluvial gravels elsewhere. As with the resources in both Cardiff and Swansea sub-regions, none of the deposits are currently worked. Marine-dredged sand is, instead, obtained from licences within the Bristol Channel and the Severn Estuary, and from a planning permission (above the low water mark) on the Bedwin Sands. These are landed at Newport Wharf and North Docks, within the Usk estuary, and at Buffer Wharfe on the Wye estuary.

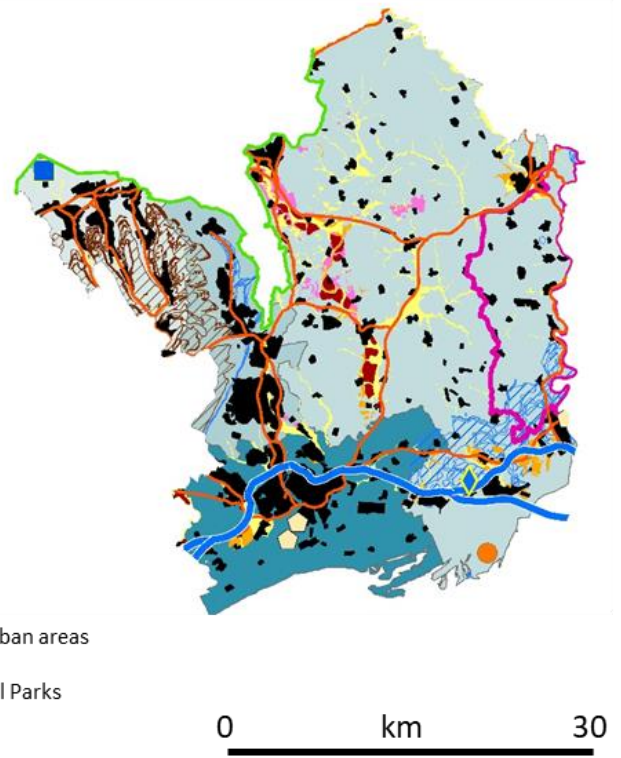
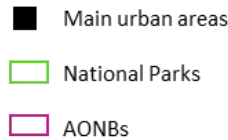
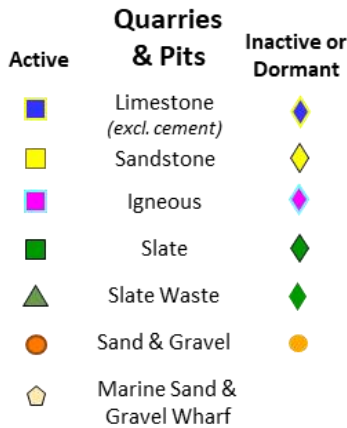
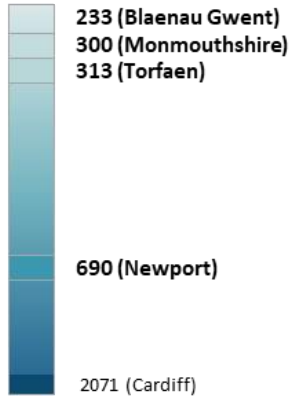
**Figure B10: Aggregate Resources and Quarries in the Former Gwent Sub-Region**



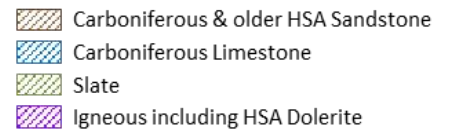
- B69. The Carboniferous Limestone resources provide essential, general-purpose construction aggregates. Those around Trefil Quarry in the north are recognised as a Preferred Area for future extraction in the Blaenau Gwent LDP, but are also constrained by being at the western edge of a subsequently-designated geological SSSI. They are located within an area of relatively low environmental capacity and are directly adjacent to the southern boundary of the Brecon Beacons National Park. Trefil is important, however, in providing the only source of active limestone production in the whole of this sub-region and the most proximal source of construction aggregates for the eastern coalfield valleys. It is also the only location within the whole of the north crop limestone resources in South Wales where an existing permission could be extended without encroaching into the National Park itself.
- B70. A far more extensive outcrop of Carboniferous Limestone resources occurs within southern Monmouthshire, though the eastern part of this outcrop falls within the Wye Valley Area of Outstanding Natural Beauty. There are currently no active quarries in the whole of this area but there is one inactive quarry at Ifton which has significant unworked permitted reserves. Beyond that site, virtually all of the unworked resources fall within areas of low environmental capacity. Pressure for future quarry development here appears to be offset, at present, by the availability of supplies from Machen quarry in Caerphilly, to the west, and from other quarries within the neighbouring Forest of Dean, in England, to the east.
- B71. Although Newport and Torfaen do have Carboniferous Limestone resources, the outcrop in those areas is very thin and much of it is sterilised by existing built development. Most of the available resources there are also within areas of relatively low environmental capacity, though that applies equally to most (but not all) of the south crop limestone resources.

**Figure B11: Aggregate Resources, Quarries, Planned Housing Requirements and Environmental Capacity in the Former Gwent Sub-Region**

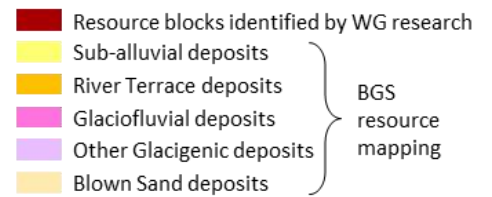
**Annualised Housing Requirements in Adopted LDPs (houses per year)**



**Crushed Rock Resources**

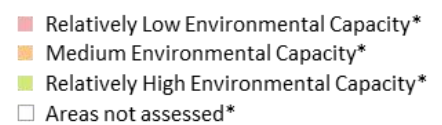


**Land-based Sand & Gravel**



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**Environmental Capacity \***



\* Assessed as part of the 'IMAECA' project, (Implementing the Methodology for Assessing the Environmental Capacity for Primary Aggregates - Enviro, 2005).



- B72. Pennant Sandstone resources are widespread within Blaenau Gwent, and along the high ground at the western edge of Torfaen. Some of the outcrop coincides with areas of relatively high or moderate environmental capacity and one such area, to the south of Cwm, in Blaenau Gwent, has been allocated in the LDP as a Preferred Area for future sandstone extraction. A further area, straddling the Blaenau Gwent /Torfaen border at Tir-Pentwys, further south, is an area of former opencast coal extraction where the remaining spoil had been identified as Preferred Areas for future working of secondary aggregate<sup>5</sup> in both LDPs. However, as noted earlier, an application for sandstone extraction (on the Torfaen side) was dismissed on Appeal, effectively sterilising the resources within both of those areas.
- B73. As noted earlier, there is currently no land-based sand & gravel extraction in the whole of SE Wales, including the Former Gwent sub-region. The extraction which takes place on the Bedwin Sands within the Severn Estuary, though technically a land-based planning permission rather than a marine dredging licence, has traditionally been grouped with other landings of marine sand & gravel.
- B74. The reconnaissance-level surveys commissioned by the Welsh Assembly (Thompson et al., 2000; 2002) identified several potential resource blocks within the lower Usk Valley (shown by the deep red shading on Figure B10 and B11). Again, these fall almost entirely within areas which have since been assessed as being of low environmental capacity, though it is understood that some of the areas have recently been subject to more detailed, and promising, commercial investigations. It remains to be seen whether or not any proposals for developing these resources will be brought forward.

### **Summary of Current Sources of Supply in South Wales**

- B75. Tables B3 to B5, below, list the currently active, inactive and dormant aggregate quarries (respectively) in each of the sub-regions of South Wales, updated to August 2018. The lists exclude quarries devoted to the manufacture of cement, building stone, silica sand, shale or other non-aggregate products, although they include two quarries which supply both aggregates and industrial limestone.

**Table B3: Active Aggregate Quarries in South Wales (2018)**

Quarry Name	Operator	Commodity	Easting	Northing
<b>CEREDIGION</b>				
Alltgoch / Bryn	G D Harries & Sons Ltd	Sandstone	249100	248500
Crug-yr-Eryr	R Powell	Sand & Gravel	242075	250310
Glanrafon Gravel Pit	CB Environmental Ltd	Sand & Gravel	260635	280300
Pant	Teifi Sand & Gravel	Sand & Gravel	265825	256575
Penparc	Cardigan Sand & Gravel Co.	Sand & Gravel	220000	248260
Ystrad Meurig (HSA)	Hanson Aggregates	Sandstone	271810	269570
<b>PEMBROKESHIRE</b>				
Blaencilgoed / Gellihalog	G D Harries & Sons Ltd	Limestone	215800	210700
Bolton Hill	G D Harries & Sons Ltd	Igneous	191800	211400
Cefn	Dyffrig Davies	Slate	220500	242900
Glogue	Mansel Davies & Son Ltd	Slate	221900	232840
<b>PEMBROKESHIRE COAST NATIONAL PARK</b>				
Carew	T Scourfield & Sons	Limestone	204900	204300
Pantgwyn	Cware Pantgwyn Quarry Ltd	Sand & Gravel	212400	242820
Rhyndaston	Mason Brothers	Igneous	189250	223625
Trefigin	Cware Trefigin Quarries Ltd	Sand & Gravel	214000	243900
<b>CARMARTHENSHIRE</b>				
Allt-y-garn	Alan Griffiths (Contractors)	Silica Sandstone	258676	215794
Blaen-y-Fan	Gower Plant Hire	Limestone	245640	211520

<sup>5</sup> The RTS requirements for primary aggregate extraction are based on the assumption that secondary and recycled aggregates will continue to contribute to the overall aggregate requirements, as they have done in the past. Secondary aggregate production cannot therefore be utilised to offset the RTS requirements for primary aggregates.

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Coygen	GD Harries & Sons Ltd	Limestone	228430	209210
Crwbin	Tarmac	Limestone	247805	213360
Garnbica (Maesdulais)	Gower Plant Hire	Limestone	251720	214610
Garn Wen	G D Harries & Sons Ltd	Igneous	216740	228680
Foelfach	Sigma Rock	Sandstone	239368	225753
Llwynjack	C J Lewis	Sand & Gravel	275400	233100
Pennant	T. Richard Jones Ltd.	Sandstone	248225	206950
Torcoed	Tarmac	Limestone	249000	213870
<b>NEATH PORT TALBOT</b>				
Cwm Nant Lleici (HSA)	Aggregate Industries UK	Sandstone	273175	207080
Gilfach (HSA)	CEMEX UK	Sandstone	275370	199880
<b>POWYS</b>				
Builth Wells (HSA)	Hanson Aggregates	Igneous	305105	252125
Criggion (HSA)	Hanson Aggregates	Igneous	328900	314400
Dolyhir (HSA)	Tarmac	Sandstone	324300	258425
Gore (HSA)	Tarmac	Sandstone	325700	259250
Middletown	Border Hardcore & Rockery	Igneous	329880	312850
Strinds	Tarmac	Limestone	324110	257855
Strinds (HSA)	Tarmac	Sandstone	324110	257855
Tan-y-Foel (HSA)	Breedon / H V Bowen	Sandstone	301240	301460
Tredomen	Powys Stone Supplies	Sandstone	311820	230400
<b>BRECON BEACONS NATIONAL PARK</b>				
Ammanford	Messrs Griffiths & Williams	Limestone	264910	217640
Penderyn	Hanson Aggregates	Limestone	295500	209000
<b>MERTHYR TYDFIL</b>				
Gelligaer (HSA)	Hanson Aggregates	Sandstone	311550	199600
<b>BRIDGEND</b>				
Cornelly	Tarmac	Limestone	283625	180160
Gaen's	T S Rees Ltd	Limestone	282380	180430
<b>RHONDDA CYNON TAF</b>				
Craig-yr-Hesg (HSA)	Hanson Aggregates	Sandstone	307917	191726
Forest Wood	Hanson Aggregates	Limestone	301600	179650
Hendy	Tarmac	Limestone	305340	181095
<b>VALE OF GLAMORGAN</b>				
Forest Wood extension	Hanson Aggregates	Limestone	301425	179400
Lithalun	Hanson Aggregates	Limestone	289560	176500
Longlands	Green Circle Aggregates Ltd	Limestone	292770	177220
Pantyyfynnon Quarry	Seth Hill & Son Ltd	Limestone	304565	174000
Wenvoe	CEMEX UK	Limestone	313410	174000
<b>CAERPHILLY</b>				
Bryn (HSA)	Bryn Aggregates Ltd	Sandstone	312600	196400
Machen	Hanson Aggregates	Limestone	322555	189000
<b>CARDIFF</b>				
Taff's Well	CEMEX UK	Limestone	312200	182200
Ton Mawr	T S Rees Ltd	Limestone	311560	182350
<b>BLAENAU GWENT</b>				
Trefil	Gryphon Quarries Ltd	Limestone	311975	213690



**Table B4: Inactive Aggregate Quarries in South Wales (2018)**

Quarry Name	Operator	Commodity	Easting	Northing
<b>CEREDIGION</b>				
Tylau	W J Evans	Sandstone	258380	260590
<b>PEMBROKESHIRE</b>				
Cronllwyn	Cronllwyn Quarry	Slate Waste	198550	235195
<b>PEMBROKESHIRE COAST NATIONAL PARK</b>				
Bottom Meadow	E Morgan	Limestone	203750	205870
Syke	G D Harries & Sons Ltd	Sandstone	187120	210915
<b>CARMARTHENSHIRE</b>				
Cilyrychen	Tarmac	Limestone	225900	221500
Coed Moelion	Mr N. Richards	Sandstone	250800	212400
Dinas (HSA)	Tarmac	Sandstone	262740	235530
<b>SWANSEA</b>				
Barland	Cuddy Group	Limestone	257540	189530
<b>NEATH PORT TALBOT</b>				
Margam Sand Pit	Associated British Ports	Sand	275500	188500
<b>POWYS</b>				
Rhayader (HSA)	Tarmac	Sandstone	297395	265875
<b>BRECON BEACONS NATIONAL PARK</b>				
Vaynor (part)	Hanson Aggregates	Limestone	303600	209900
<b>MERTHYR TYDFIL</b>				
Vaynor (part)	Hanson Aggregates	Limestone	303600	209900
<b>BRIDGEND</b>				
Cefn Cribbwr	T S Rees Ltd	Sandstone	287400	182800
Grove	Tarmac	Limestone	282249	179871
<b>VALE OF GLAMORGAN</b>				
Ewenny	Tarmac	Limestone	290250	176805
Garwa	Tarmac	Limestone	297940	179840
<b>CAERPHILLY</b>				
Blaengwynlais (part)	Tarmac	Limestone	314610	184265
Cwmleyshon	Hanson Aggregates	Limestone	321000	186930
Hafod Fach (HSA)	Tarmac	Sandstone	322580	196500
<b>CARDIFF</b>				
Blaengwynlais (part)	Tarmac	Limestone	314610	184265
Cefn Garw	Mr E Bassett	Limestone	314000	183000
Creigiau	Tarmac	Limestone	309000	181975
<b>MONMOUTHSHIRE</b>				
Ifton	Hanson Aggregates	Limestone	346400	188770

**Table B5: Dormant (or Suspended) Aggregate Quarries in South Wales (2018)**

Quarry Name	Operator	Commodity	Easting	Northing
<b>PEMBROKESHIRE</b>				
Treffgarne	Sealyham Activity Centre	Igneous	195875	223965
<b>PEMBROKESHIRE COAST NATIONAL PARK</b>				
Penberry	Hendre Eynon Farm Ltd.	Igneous	176940	229220
<b>CARMARTHENSHIRE</b>				
Cynghordy	Mr D Roderick	Sandstone	279400	240300
Glantowy	Mr A Lewis	Sand & Gravel	274745	232375
Limestone Hill	Dan Williams	Limestone	246670	212600
Llwyn-y-Fran	Hobbs Holdings Ltd	Limestone	257690	216032
Pen-y-banc	Mrs Antonia Jones-Davies	Limestone	247035	212960
Pwll-y-March	Gower Plant	Limestone	259475	216380
<b>POWYS</b>				
Caerfagu (suspended)	Caerfagu Products	Sand & Gravel	304400	265350
Garreg	Hanson Aggregates	Igneous	328760	311935
<b>BRECON BEACONS NATIONAL PARK</b>				
Llanfair	Glanusk Estate	Sandstone	320705	219975
<b>BRIDGEND</b>				
Stormy Down	Hobbs Holdings Ltd	Limestone	284185	180380
<b>VALE OF GLAMORGAN</b>				
Argoed Isha	T Pritchard & J Rosser	Limestone	299250	179050
Cnap Twt	Duchy of Lancaster	Limestone	291055	175350
Ruthin	Tarmac	Limestone	297390	179220
St Andrews	Mr T J Bowles	Limestone	314350	171340
<b>CAERPHILLY</b>				
Caerllwyn	Mr & Mrs Thomas	Sandstone	318350	193700
Cefn Onn	Trustees of W. Lewis Estate	Limestone	317400	185200
Ochr Chwith	Hanson Aggregates	Limestone	323325	189810

- B76. Whilst any of the sites listed in these tables may be able to contribute to future supply (subject to the dormant sites obtaining new development consents through the ROMP process<sup>6</sup>), it is only the active and remaining inactive sites which contributed to the reserves figures presented in Table 5.5 and 5.7 of the main document. Reserves at dormant sites are noted separately in those tables. The active sites and some of the currently inactive ones, together with a small number of other sites which have since closed, contributed to the historical sales over the baseline period (2007 to 2016).
- B77. Full lists of active, inactive and dormant sites for individual years prior to 2018 are given in the relevant annual RAWP reports.

### ***Apportionments, Allocations and Guidance to LPAs in South Wales***

- B78. Tables B6 and B7, below, summarise the apportionments, permitted reserves and allocations for land-won sand & gravel and for crushed rock (respectively) which have been assigned to each Local Planning Authority in South Wales.
- B79. The pages which follow set out in more detail the recommendations and guidance for each individual LPA in South Wales, drawing upon the figures set out in these tables. The LPAs are dealt with in alphabetical order. In each case, reference to the 'Plan period' relates to the end date of the Local Development Plan which has been adopted or is nearing completion (whichever is later) for that particular planning authority.

<sup>6</sup> ROMP is the acronym for the Review of Old Mineral Permissions, under the Environment Act 1995. Further details are given in the Glossary at the end of the Main Document.

**Table B6: Apportionments, Reserves and Allocations for Sand & Gravel in South Wales**

Local Planning Authority	New Annualised Apportionment for sand & gravel (mt)	Total Apportionment Required over 22 years	Existing permitted reserves at end of 2016 in mt	Minimum Allocation needed to meet Required Provision (mt)	Additional reserves at Dormant sites, 2016 (mt)
Ceredigion	0.188	4.136	0.510	3.626	0
Pembrokeshire	0.000	0.000	0.000	0.000	0
Pembrokeshire Coast NP	0.118	2.600	2.600	0.000	0
Carmarthenshire	0.003	0.058	0.100	See note 1	0.35
Swansea	0.000	0.000	0.000	0.000	0
Neath Port Talbot	0.000	0.000	0.000	0.000	0
Powys	0.000	0.000	0.000	0.000	0
Brecon Beacons NP	0.000	0.000	0.000	0.000	0
Merthyr Tydfil	0.000	0.000	0.000	0.000	0
Bridgend	0.000	0.000	0.000	0.000	0
Rhondda Cynon Taf	0.000	0.000	0.000	0.000	0
Vale of Glamorgan	0.000	0.000	0.000	0.000	0
Caerphilly	0.000	0.000	0.000	0.000	0
Cardiff	0.000	0.000	0.000	0.000	0
Blaenau Gwent	0.000	0.000	0.000	0.000	0
Monmouthshire	0.000	0.000	0.000	0.000	0
Newport	0.000	0.000	0.000	0.000	0
Torfaen	0.000	0.000	0.000	0.000	0
<b>Sub-totals, South Wales</b>	<b>0.309</b>	<b>6.795</b>	<b>3.21</b>	<b>3.626</b>	<b>0.35</b>
<b>TOTALS Wales</b>	<b>1.353</b>	<b>29.758</b>	<b>18.406</b>	<b>11.394</b>	<b>0.85</b>

SOURCE: Table 5.5 of the main document

1. There is no specific allocation for Carmarthenshire but, subject to collaborative agreement with the LPAs in West Wales, the sand & gravel allocations needed for Ceredigion could potentially be provided, in part, from neighbouring parts of Carmarthenshire, despite being in a different sub-region.

Where allocation requirements are shown these are the minimum amounts required to meet the RTS requirements. In many cases an application for an individual new permission will exceed these amounts, in the interests of economic viability. Such applications should not be rejected purely on the grounds of exceeding the minimum requirements shown here. In some cases, the suggested allocations may already have been partially or entirely fulfilled, either by new permissions granted since 2016, or by allocations that have already been identified in LDPs. See following text for details

**Table B7: Apportionments, Reserves and Allocations for Crushed Rock in South Wales**

Local Planning Authority	New Annualised Apportionment for crushed rock (mt)	Total Apportionment Required over 25 years.	Existing permitted reserves at end of 2016 in mt	Minimum Allocation needed to meet Required Provision (mt)	Additional reserves at Dormant sites, 2016 (mt)
Ceredigion	0.272	6.798	5.370	1.428	0
Pembrokeshire	0.677	16.932	16.720	0.212	0
Pembrokeshire Coast NP	0.259	6.470	10.370	0.000	0
Carmarthenshire	1.102	27.556	59.900	0.000	13.82
Swansea	0.305	7.636	0.000	7.636	0
Neath Port Talbot	0.305	7.636	16.480	0.000	0
Powys	3.519	87.981	139.240	0.000	0
Brecon Beacons NP	0.368	9.200	120.100	0.000	0.36
Merthyr Tydfil	0.199	4.975			
Bridgend	0.699	17.471	27.270	0.000	0.15
Rhondda Cynon Taf	0.753	18.816	9.830	8.986	0
Vale of Glamorgan	0.672	16.806	18.730	0.000	13
Caerphilly	0.535	13.371	31.280	0.000	5.21
Cardiff	1.383	34.578	27.800	6.778	0
Blaenau Gwent	0.201	5.027	1.320	3.707	0
Monmouthshire	0.235	5.866	11.250	0.000	0
Newport	0.434	10.854	0.000	10.854	0
Torfaen	0.258	6.441	0.000	6.441	0
<b>Sub-totals, South Wales</b>	<b>12.177</b>	<b>304.415</b>	<b>495.66</b>	<b>46.043</b>	<b>32.54</b>
<b>TOTALS Wales</b>	<b>18.871</b>	<b>471.781</b>	<b>670.850</b>	<b>81.971</b>	<b>34.20</b>

SOURCE: Table 5.7 of the main document

Where allocation requirements are shown these are the minimum amounts required to meet the RTS requirements. In many cases an application for an individual new permission will exceed these amounts, in the interests of economic viability. Such applications should not be rejected purely on the grounds of exceeding the minimum requirements shown here. In some cases, the suggested allocations may already have been partially or entirely fulfilled, either by new permissions granted since 2016, or by allocations that have already been identified in LDPs. See following text for details.

- B80. As explained more fully in the main document, the figures for each authority are based on the assumptions that future aggregate requirements will increase in future years to reflect the increased planned requirements for house construction, and that supplies of alternative aggregates, from marine, secondary and recycled sources, will continue to be maintained in proportions comparable to those experienced during the baseline period (2007 to 2016).
- B81. The validity of these assumptions will continue to need to be monitored by the planning authority, using information from various data sources and new surveys (e.g. by Welsh Government, NRW, and the Mineral Products Association) and that data will be used to inform a revision of the apportionment requirements, if this is needed, as part of the next review of the RTS.
- B82. It should be emphasised that the annualised apportionment figures are given only as a guide to the calculation of the total apportionment required over the duration of the LDP. In practice, sales

will vary from year to year and there is no requirement for an LPA to maintain or limit those sales in line with the annualised apportionments.

- B83. The need for provision to extend beyond the Plan period is based on the requirement in MTAN1 for maintaining landbanks of 7 years for sand & gravel and 10 years for crushed rock, throughout the full duration of the LDP. Subject to this requirement being met, the overall provision at any given time may comprise both landbanks of permitted reserves and allocations for future working, where these are required.
- B84. In all cases, the recommendations are based on currently available information regarding reserves, production, proximity and environmental capacity. As noted in 'Box 1' of the original RTS documents, the suggested apportionments and allocations may not take fully into account all factors that may be material to the ensuring an adequate supply of aggregates obtained from appropriately located sources. Such factors may include such things as:
- The technical capability of one type of aggregate to interchange for another;
  - The relative environmental cost of substitution of one type of aggregate by another;
  - The relative environmental effects of changing patterns of supply; and
  - Whether adequate production capacity can be maintained to meet the required level of supply.
- B85. For such reasons, and as already noted in Chapter 1 of the main document, *in exceptional circumstances*, and where it is justified by new (e.g. more up to date, more detailed or more precise) evidence, it is open for individual LPAs to depart from the apportionment and allocation figures recommended by the RTS when preparing their LDP policies. In doing so, however, an LPA would need to demonstrate that their intended departure would not undermine the overall strategy provided by the RTS itself (e.g. by working together with other LPAs within the same sub-region to ensure that sub-regional and regional totals are still achieved) and this would need to be reflected in the Statement of Sub-Regional Collaboration (SSRC) agreed with all other constituent LPAs within that sub-region, prior to Examination. Any shared arrangements that may be agreed between individual LPAs would need to offer advantages, in terms of the proximity principle, environmental capacity and other sustainable criteria, compared with the basic RTS recommendations. Guidelines relating to the preparation of SSRCs, including details of the circumstances under which departures from RTS recommendations may be made, are provided at Annex A of the Main Document.
- B86. As noted in MTAN 1, paragraph A3: If the local authorities reach no agreement or if individual local authorities do not accept the Regional Technical Statement, the Welsh Assembly Government will consider its default powers to intervene in the planning process as a last resort.

## BLAENAU GWENT

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **0.201 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Blaenau Gwent, as calculated in Tables 5.5 and 5.7 of the main document, are zero for land-won sand & gravel and 5.027 million tonnes for crushed rock, over 25 years. These compare with existing landbanks of zero for sand & gravel and 1.32 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).

### **Allocations required to be identified in the Local Development Plan**

In order to address the resulting crushed rock shortfall, new allocations totalling at least 3.707 million tonnes will need to be identified within the LDP. The main requirement (as in both previous editions of the RTS) is to supplement the existing reserves of Carboniferous Limestone. A Preferred Area for this has already been identified within the adopted LDP but, as the landbank is substantially less than the minimum requirement of 10 years, there is now an urgent requirement for new permitted reserves.

The area also has substantial resources of HSA sandstone which, though not urgently required, would be beneficial in terms of helping to shift the overall pattern of sandstone production further east, towards the principal markets in England. Again, a preferred area for this has been identified within the LDP, along with part of the former opencast site at Tir-Pentwys, where the spoil tips are identified in the LDP as a preferred area for secondary aggregate production. Working of those resources, however, would be dependent on access through the Torfaen part of the site, where a recent application has been dismissed on appeal, effectively rendering the resources unworkable unless and until an alternative means of access is agreed.

Consideration should also be given to whether any of the factors set out in paragraph B84 above give rise to any further requirements for resource allocations.

In view of the fact that the neighbouring authorities of Torfaen and Newport may have difficulty in meeting their own new apportionments, given the limited resources in those areas, Blaenau Gwent may *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, need to work in collaboration with those authorities, and with Monmouthshire, in order meet the combined requirements for the Former Gwent sub-region as a whole. Where different apportionments are agreed, these will need to be set out in a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

### **Use of alternative aggregates**

In the absence of any significant known land-based sand & gravel resources, Blaenau Gwent relies upon supplies of marine-dredged sand, imported via three wharves in Newport.

Secondary aggregates in the form of overburden material from former opencast coal workings have been identified as a Preferred Area at Tir Pentwys, straddling the border with neighbouring Torfaen. The exploitation of the material within Blaenau Gwent, however, is dependent on access through the Torfaen part of the site.

There is, however, likely to be continued recycled aggregate production within the area from construction, demolition and excavation wastes.

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

**Safeguarding of primary aggregate resources**

Relevant resources of both crushed rock aggregates and land-based sand & gravel have been safeguarded within the LDP, in accordance with detailed advice based on the use of British Geological Survey mapping, prior to the publication of the BGS safeguarding maps.

**Safeguarding of wharves and railheads**

All existing and potential new railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## BRIDGEND

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **0.699 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

These figures exclude the provision of limestone for non-aggregate use (primarily for use in the steel industry within neighbouring Neath Port Talbot), for which separate consideration will need to be given in the LDP.

### **Comparison with existing landbanks**

The total apportionments for Bridgend, as calculated in Tables 5.5 and 5.7 of the main document are zero for land-won sand & gravel and 17.471 million tonnes for crushed rock, over 25 years. These compare with existing landbanks (excluding dormant sites) of zero for sand & gravel and 27.27 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016). These figures exclude limestone reserves which are allocated for non-aggregate use.

### **Allocations required to be identified in the Local Development Plan**

In view of the surplus of existing permitted reserves for crushed rock, and the lack of sand & gravel production, no further allocations for future working are required to be identified within the LDP. However, consideration should be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

Any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

Consideration is also needed regarding the extent to which some of the surplus of Carboniferous Limestone reserves in Bridgend might, *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, be needed to accommodate any increase in apportionment, to compensate for shortages of supply of such aggregate in neighbouring LPAs. If such arrangements are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

### **Treatment of Dormant sites**

One dormant limestone quarry exists within Bridgend, as detailed in Table B5, above. The planning authority should assess the likelihood of this quarry being worked within the Plan period, subject to the completion of an initial review of planning conditions and submission of an Environmental Impact Assessment. If there is a likelihood of reactivation, and if the quarry is considered by the authority to conform to the definition of 'Specific Sites', as set out in paragraph 5.14.19 of Planning Policy Wales, it may be offset against any requirements that may otherwise be identified for allocations for future working.

### **Use of alternative aggregates**

Bridgend is currently reliant, for supplies of sand, on marine-dredged material imported via wharves in neighbouring Neath Port Talbot (and perhaps Cardiff). This is despite the existence of limited potential land-based resources within its area, as indicated on BGS resource maps



and in reconnaissance-level mapping carried out for the Welsh Government by Symonds Group Ltd. in 2000.

There are no secondary aggregate sources of any significance within Bridgend, although steel/blast furnace slag may be delivered by road from Neath-Port Talbot.

In addition, construction, demolition and excavation wastes are generated and recycled at a number of points within the area.

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

#### **Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

#### **Safeguarding of wharves and railheads**

All existing and potential new railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## CAERPHILLY

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **0.535 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Caerphilly, as calculated in Tables 5.5 and 5.7 of the main document are zero for land-won sand & gravel and 13.371 million tonnes for crushed rock, over 25 years. These compare with existing landbanks (excluding dormant sites) of zero for sand & gravel and 31.28 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).

### **Allocations required to be identified in the Local Development Plan**

In view of the surplus of existing permitted reserves for crushed rock, and the lack of sand & gravel production, no further allocations for future working are required to be identified within the LDP. However, consideration should be given to whether any of the other factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

Any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

Consideration is also needed regarding the extent to which some of the surplus of crushed rock reserves in Caerphilly might, *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, be needed to accommodate any increase in apportionment to compensate for shortages of Carboniferous Limestone supply in neighbouring LPAs. If such arrangements are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

### **Treatment of Dormant sites**

A total of three dormant quarries exist within Caerphilly, as detailed in Table B5, above. The planning authority should assess the likelihood of each of these sites being worked within the Plan period, subject to the completion of an initial review of planning conditions and submission of an Environmental Impact Assessment. Where there is a likelihood of reactivation, and where the site(s) in question are considered by the authority to conform to the definition of 'Specific Sites', as set out in paragraph 5.14.19 of Planning Policy Wales, they may be offset against any requirements that may otherwise be identified for allocations for future working.

### **Use of alternative aggregates**

In the absence of any current land-based sand & gravel pits within Caerphilly or adjoining areas (despite the existence of potential land-based resources, as indicated on BGS resource maps), supplies of sand from marine-dredged sources are imported via the wharves in Newport and/or Cardiff. All of Caerphilly lies within 30 to 40 km of those wharves.

Substantial quantities of colliery spoil are understood to exist above Bedwas, Machen, and Llanbradach, but these are generally remote from transport links and therefore difficult to

utilise effectively. Moreover, as noted in the original RTS, previous efforts to obtain planning permission for the removal of tips in Machen have been refused.

Recycled aggregates from construction, demolition and excavation wastes are likely to be available within most of the major towns within the borough.

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

#### **Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

#### **Safeguarding of wharves and railheads**

All existing and potential new railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## CARDIFF

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **1.383 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Cardiff, as calculated in Tables 5.5 and 5.7 of the main document, are zero for land-won sand & gravel and 34.578 million tonnes for crushed rock, over 25 years. These compare with existing landbanks of zero for sand & gravel and 27.8 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).

### **Allocations required to be identified in the Local Development Plan**

In order to address the resulting crushed rock shortfall, new allocations totalling at least 6.778 million tonnes will need to be identified within the LDP. The requirement in this area is for Carboniferous Limestone. Consideration should also be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

Any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

In the event that allocations (or new permissions) cannot be made to address the shortfall, and *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, consideration may need to be given to collaborative working with neighbouring LPAs within the same sub-region, such that some of the required provision (apportionment) is effectively transferred. If such arrangements are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

### **Use of alternative aggregates**

Cardiff is reliant for its sand on marine-dredged aggregates from the Bristol Channel, imported via two wharves within Cardiff docks. Although potential land-based resources are indicated within its area, on BGS resource maps, most of these are sterilised by existing built development.

Some secondary aggregates are available, including steel slag from the electric arc furnace steelworks in Cardiff, but most arisings are fully utilised as they are produced, with relatively small stockpiles.

Construction, demolition and excavation wastes suitable for recycling as aggregate materials are likely to be extensive, amounting to a considerable proportion of the regional total.

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

**Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

**Safeguarding of wharves and railheads**

All existing and potential new wharves and railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## CARMARTHENSHIRE

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: **0.003 million tonnes per year** until the end of the Plan period and for 7 years thereafter.
- Crushed rock aggregates provision: **1.102 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Carmarthenshire, as calculated in Tables 5.5 and 5.7 of the main document, over the 22-year horizon required for sand & gravel, and the 25-year timescale required for crushed rock, are 0.058 million tonnes for land-won sand & gravel and 27.556 million tonnes for crushed rock. These figures compare with existing landbanks (excluding dormant sites) of 0.1 million tonnes for sand & gravel and 59.9 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).

### **Allocations required to be identified in the Local Development Plan**

In view of the slight surplus of existing permitted reserves of sand & gravel within Carmarthenshire, no allocations are specifically required to be identified in the LDP. However, some of the resources in Carmarthenshire lie in close proximity to the neighbouring authorities of Ceredigion, Pembrokeshire and the Pembrokeshire Coast National Park, where there is a need to find new sources of sand & gravel outside the National Park. Consideration is therefore also needed regarding the extent to which, *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, there may be a need to identify allocations to assist with the future provision of sand & gravel to those areas. This would necessitate a transfer of apportionments (for sand & gravel) between the authorities (but would not apply to the apportionment for crushed rock). If such arrangements are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

In view of the substantial surplus of existing crushed rock reserves, no crushed rock allocations are required to be made in the LDP. However, consideration should also be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

Any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

### **Treatment of Dormant sites**

A total of six dormant quarries exist within Carmarthenshire, as detailed in Table B5, above. The planning authority should assess the likelihood of each of these sites being worked within the Plan period, subject to the completion of an initial review of planning conditions and submission of an Environmental Impact Assessment. Where there is a likelihood of reactivation, and where the site(s) in question are considered by the authority to conform to the definition of 'Specific Sites', as set out in paragraph 5.14.19 of Planning Policy Wales, they may be offset against any requirements that may otherwise be identified for allocations for future working.

### **Use of alternative aggregates**

Carmarthenshire is currently reliant upon supplies of sand from marine-dredged sources in the outer Bristol Channel, imported via Burry Port. This is despite the existence of potential land-based resources within its area, as indicated on BGS resource maps.

There are no known sources of secondary aggregates within the County.

Recycled aggregates are likely to be minimal over most of the County, and widely dispersed, although greater concentrations are likely to arise in the south east of the county, coincident with the redevelopment of former industrial areas.

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

### **Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

### **Safeguarding of wharves and railheads**

All existing and potential new wharves and railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## CEREDIGION

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: **0.188 million tonnes per year** until the end of the Plan period and for 7 years thereafter.
- Crushed rock aggregates provision: **0.272 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Ceredigion, as calculated in Tables 5.5 and 5.7 of the main document, over the 22-year horizon required for sand & gravel, and the 25-year timescale required for crushed rock, are 4.136 million tonnes for land-won sand & gravel and 6.798 million tonnes for crushed rock. These figures compare with existing landbanks of 0.51 million tonnes for sand & gravel and 5.37 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).

### **Allocations required to be identified in the Local Development Plan**

To address the sand & gravel shortfall, sand & gravel allocations totalling at least 3.626 million tonnes will need to be identified within the LDPs of this and/or neighbouring authorities of Pembrokeshire and Carmarthenshire. Existing specific site allocations of 1.8mt at Penparc and approximately 0.15mt at Pant Quarry can be deducted from this total, leaving a requirement of at least 1.676 million tonnes still to be identified.

Additional crushed rock allocations totalling at least 1.428 million tonnes will also need to be made. Consideration should also be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

In practice, given the close proximity of Ceredigion to the neighbouring authorities of Pembrokeshire and the Pembrokeshire Coast National Park, where there is a need to find new sources of sand & gravel outside the National Park, Ceredigion should continue to work in collaboration with those authorities and, *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, may also need to collaborate with neighbouring Carmarthenshire. If necessary, Ceredigion may need to increase its share of the combined sub-regional apportionment for sand & gravel, compared with the figures given above. This does not apply to the apportionment for crushed rock. If such arrangements are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

Any new allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

As noted in the main document, it may be better (in terms of deliverability) to rely on specific sites in neighbouring authorities (additional to the LPAs' own requirements), where these have been agreed through collaborative working, in preference to relying upon highly uncertain Areas of Search.

### **Use of alternative aggregates**

As noted in the original RTS, Ceredigion is beyond the notional haulage limit for marine-dredged aggregate from the Bristol Channel. Although there had been some indications that southern Cardigan Bay could provide marine sand and gravel in future years, there has been



no further development of this, not least because of the high costs of infrastructure associated with setting this up as a new source of supply.

There are no sources of secondary aggregate within the area and recycled aggregate sources are both minimal and widely dispersed.

**Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

**Safeguarding of wharves and railheads**

Ceredigion has no operational wharves but has a number of small working harbours. These, together with all existing railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

**MERTHYR TYDFIL /BRECON BEACONS NATIONAL PARK****Apportionment for the future provision of land-won primary aggregates**

The two planning authorities are treated jointly in order to protect the commercial confidentiality of data for the small number of quarries involved, and because one of those quarries (Vaynor) straddles the boundary between the two authorities. Together, they are required to make future provision for land-won primary aggregates within their Local Development Plans on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: 0.199 million tonnes per year within Merthyr Tydfil and 0.368 million tonnes per year within the National Park until the end of the Plan period and for 10 years thereafter.

The figures exclude the provision of limestone for non-aggregate use, for which separate consideration may need to be given in the LDPs.

**Comparison with existing landbanks**

The total apportionments for Merthyr Tydfil and the Brecon Beacons National Park, as calculated in Tables 5.5 and 5.7 of the main document are zero for land-won sand & gravel and 14.175 million tonnes for crushed rock, over 25 years (made up of 4.975 million tonnes in Merthyr Tydfil and 9.2 million tonnes in the National Park). These compare with existing landbanks (excluding dormant sites) of zero for sand & gravel and more than 120 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016). These figures exclude any limestone reserves which are allocated for non-aggregate use.

**Allocations required to be identified in the Local Development Plans**

In view of the substantial surplus of existing permitted crushed rock reserves, and the lack of any sand & gravel extraction in either authority, no further allocations are required to be identified within either of the LDPs. However, consideration should be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations. If any adjustments are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A of the RTS Main Document, before any of the constituent LDPs are submitted for Examination.

Any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

Paragraph 49 of MTAN 1 notes that landbanks are not required to be maintained within National Parks. For this reason, no allocations should be identified within the Brecon Beacons National Park, unless there are no environmentally acceptable alternatives and efforts should be made to gradually transfer production which currently takes place within the National Park to neighbouring authorities. Given that this production relates only to limestone and that it serves markets which, if not within the National Park, are largely (if not exclusively) to the south and west (mostly within the Cardiff City sub-region), it is logical that limestone quarries and resources in those areas should be the main focus of any substitution which can be achieved. This has been the intention of the present Review of the RTS and is the reason why the apportionments for the National Park have been reduced.

**Treatment of Dormant and Suspended sites**

One dormant sandstone quarry exists within the Brecon Beacons National Park, as detailed in Table B5, above. The planning authority should assess the likelihood of this site being worked within the Plan period, subject to the completion of an initial review of planning conditions and

submission of an Environmental Impact Assessment. Where there is a likelihood of reactivation, and if the site considered by the authority to conform to the definition of 'Specific Sites', as set out in paragraph 5.14.19 of Planning Policy Wales, the permitted reserves may be offset against any requirements that may otherwise be identified for allocations for future working.

#### **Use of alternative aggregates**

Some imports of sand from marine-dredged sources, imported primarily via wharves in Cardiff to the south, are likely to be utilised in the absence of any current land-based sand & gravel extraction. This is despite the existence of potential land-based resources within both Merthyr and the National Park, as indicated on BGS resource maps and in reconnaissance-level mapping carried out for the Welsh Government by Symonds Group Ltd. in 2000.

As noted within the original RTS, no significant amounts of secondary aggregate are present within Merthyr Tydfil, but volumes of construction, demolition and excavation wastes are likely to be widely available in the main valley areas.

The residual requirements for primary land-won aggregates assume that these alternative materials will continue to be utilised and the authority should continue to encourage this.

Within the National Park, there are very few ongoing mineral workings of any kind and therefore only limited, if any, sources of secondary aggregate. Similarly, there are likely to be only limited quantities of recycled material from local construction and demolition projects. Nevertheless, the National Park Authority should continue to promote the use of these materials where they are available.

#### **Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDPs of both authorities, in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

#### **Safeguarding of wharves and railheads**

All existing and potential new railheads should be identified for safeguarding within both LDPs, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## MONMOUTHSHIRE

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **0.235 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Monmouthshire, as calculated in Tables 5.5 and 5.7 of the main document are zero for land-won sand & gravel and 5.866 million tonnes for crushed rock, over 25 years. These compare with existing landbanks (excluding dormant sites) of zero for sand & gravel and 11.25 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).

### **Allocations required to be identified in the Local Development Plan**

In view of the surplus of existing permitted reserves for crushed rock, and the lack of sand & gravel production, no further allocations for future working are specifically required to be identified within the LDP. However, consideration should be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

In view of the fact that the neighbouring authorities of Torfaen and Newport may have difficulty in meeting their own new apportionments, given the limited resources in those areas, Monmouthshire may, *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, need to work in collaboration with those authorities, and with Blaenau Gwent, in order to meet the combined requirements for the Former Gwent sub-region as a whole. As illustrated in Figure B11 above, Monmouthshire does have extensive unworked resources of Carboniferous Limestone, together with potential resources of sand & gravel along parts of the Usk Valley and elsewhere. Most of those resources, however, fall primarily within areas of relatively low environmental capacity and much of the limestone lies beneath the water table within a principal aquifer. Both of these factors would need to be taken into consideration.

Where different apportionments are agreed, these will need to be set out in a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

Any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

### **Use of alternative aggregates**

Marine sand from the Severn Estuary, including the Bedwin Sands, is landed at three wharves in neighbouring Newport. The whole of the county lies within a maximum radius 30 miles from one or more of these wharves and is reliant upon this material. This is despite the existence of extensive potential land-based resources, particularly within the Usk Valley, as indicated on BGS resource maps and in reconnaissance-level mapping carried out for the Welsh Government by Symonds Group Ltd. in 2000.

As noted in the original RTS, there are no significant sources of secondary aggregates in the area.

Recycled aggregates are likely to be available to a limited extent within some of the small rural towns but are these are widely dispersed within the predominantly rural area and are not thought likely to contribute significantly to the overall pattern of supply.

The residual requirements for primary land-won aggregates in Monmouthshire assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

Limestone and land won sand and gravel is also imported by road from England. These imports are less desirable in terms of the proximity principle, but are beyond the control of the local planning authority.

#### **Safeguarding of primary aggregate resources**

Relevant resources of both crushed rock aggregates and land-based sand & gravel have been safeguarded within the LDP, in accordance with detailed advice based on the use of British Geological Survey mapping, prior to the publication of the BGS safeguarding maps.

#### **Safeguarding of wharves and railheads**

All existing and potential new wharves and railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## NEATH PORT TALBOT

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **0.305 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Neath Port Talbot, as calculated in Tables 5.5 and 5.7 of the main document are zero for land-won sand & gravel and 7.636 million tonnes for crushed rock, over 25 years. These compare with existing landbanks of zero for sand & gravel and 16.48 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016). These figures exclude any limestone reserves which are allocated for non-aggregate use.

### **Allocations required to be identified in the Local Development Plan**

In view of the surplus of existing permitted crushed rock reserves, and the lack of sand & gravel production, no further allocations are required to be identified within the LDP. However, consideration should also be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

It should be noted that the apportionment for Neath Port Talbot has been significantly reduced, compared with that given in previous RTS editions, with the deliberate intention of encouraging a more equitable pattern of supply, with future production of crushed rock being supplied from neighbouring Swansea as well as from NPT. In effect, part of Neath Port Talbot's apportionment (for HSA sandstone production) has been transferred to Swansea. In the event that new allocations (or permissions) cannot be made to address the shortfall, and *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, consideration may need to be given to collaborative working with neighbouring LPAs within the same sub-region, such that some or all of the transferred provision is reversed. Any revised arrangements that may be agreed between these authorities would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

Any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

### **Use of alternative aggregates**

Neath Port Talbot is reliant, for its supplies of sand, on marine-dredged sources, imported via the three operational wharves at Briton Ferry and Giant's Wharf. This is despite the existence of limited potential land-based resources within its area, as indicated on BGS resource maps and in reconnaissance-level mapping carried out for the Welsh Government by Symonds Group Ltd. in 2000.

There are considerable secondary aggregate resources within Neath Port Talbot, primarily associated with the reprocessing of steel and blast furnace slag from the Port Talbot steelworks. Most of the slag is fully utilised, partially as construction aggregate and partly as a sustainable alternative to cement. Some of the secondary aggregate is transported by sea to Newport for processing and distribution. One of the largest construction and demolition waste recycling facilities in the region is based at Neath.

In addition, and in common with other MPAs within the South Wales coalfield, the overburden and 'waste' associated with opencast coal extraction includes some high PSV sandstone, but these are acknowledged as temporary 'windfalls' rather than permanent supply sources (and in any case are included in the figures for primary, rather than secondary aggregates). Future proposals for opencast coal extraction should, nevertheless, be encouraged to utilise such material in order to offset the need for additional allocations of sandstone (subject to there being satisfactory proposals relating to the restoration of these large-scale sites and to the stockpiling and distribution of the stone).

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

#### **Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

#### **Safeguarding of wharves and railheads**

All existing and potential new wharves and railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## NEWPORT

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **0.434 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Newport, as calculated in Tables 5.5 and 5.7 of the main document are zero for land-won sand & gravel and 10.854 million tonnes for crushed rock, over 25 years. The authority currently has zero existing landbanks of permitted reserves, both for sand & gravel and for crushed rock.

### **Allocations required to be identified in the Local Development Plan**

In view of the lack of any existing permitted reserves within Newport, allocations totalling at least 10.854 million tonnes will need to be identified within the LDP. This contrasts with the zero allocation given in the First Review of the RTS but is less than the recommendations given in the original RTS which, purely on the basis of the 'per capita' approach, required Newport to assess the potential to make a resource allocation of 8 to 8.5 million tonnes over a 15-year period (equivalent to 13 to 14mt over 25 years). The requirement, based on the potential availability of resources within Newport (albeit that these are limited), is specifically for Carboniferous Limestone, although contributions from land won sand & gravel resources might be feasible.

Consideration should also be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

Given the lack of existing operational sites within Newport, the authority will need to seek proposals for new working from industry. In the event that that allocations (or new permissions) cannot be made to address the shortfall then, *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, consideration may need to be given to collaborative working with neighbouring LPAs, such that some of the required provision (apportionment) is effectively transferred. If such arrangements are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

Any allocations that may be identified should, as far as possible, be Specific Sites or, failing that, Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

### **Use of alternative aggregates**

Newport is supplied with sand from marine-dredged sources within the Severn Estuary and the Bristol Channel, via up to three separate wharves within the city. This is despite the existence of limited potential land-based resources within its area, as indicated on BGS resource maps (most but not all of which are sterilised by existing built development).

The original RTS recommended that the feasibility of sea borne rock imports, via these wharves, should be explored. Discussions with the wharf operators in 2009 suggested that the scope for landing additional tonnages of crushed rock aggregate here is extremely limited (Cuesta Consulting Ltd., 2009). The operations are geared up for the landing and processing of marine-



dredged sand. Whilst it would be theoretically possible to land crushed rock, there is insufficient space for both operations to co-exist. In the absence of any current land-based sand & gravel operations in South East Wales, the marine sand is vital to the local construction industry and is therefore unlikely to be displaced by crushed rock imports.

In terms of secondary aggregates, the former Llanwern steelworks previously supplied aggregates derived from blast furnace slag on an ongoing basis, but this ceased when the blast furnace closed in July 2001. The same site continued to produce Basic Oxygen Steel (BOS) slag from the stockpiles of this material which have accumulated over many previous decades of steel production, but it is understood that this has now ceased.

The rail sidings at 'Monmouthshire Bank' in Newport were also previously utilised to process spent rail ballast for use as aggregate. However, in March 2009, aggregate production at this site ceased and Network Rail redistributed the remaining stocks to other sites, elsewhere. This site therefore no longer represents a source of supply for Newport.

Recycled aggregates, produced from construction, demolition and excavation wastes, are likely to continue to provide an important contribution to the overall supply pattern for construction aggregates within this predominately urban area.

The residual requirements for primary land-won aggregates assume that these various alternative materials will continue to be utilised and the authority should continue to encourage this.

#### **Safeguarding of primary aggregate resources**

Relevant resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP, in accordance with detailed advice based on the use of British Geological Survey mapping, prior to the publication of the BGS safeguarding maps.

#### **Safeguarding of wharves and railheads**

All existing and potential new wharves and railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## PEMBROKESHIRE

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil.
- Crushed rock aggregates provision: **0.677 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Pembrokeshire, as calculated in Tables 5.5 and 5.7 of the main document, over the 22-year horizon required for sand & gravel and the 25-year timescale required for crushed rock are zero for land-won sand & gravel and 16.932 million tonnes for crushed rock. These figures compare with existing landbanks (excluding dormant sites) of zero for sand & gravel and 16.72 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).

### **Allocations required to be identified in the Local Development Plan**

Given that Pembrokeshire currently has no sand & gravel operations, and that its permitted reserves of crushed rock are very close to the total apportionment required, no allocations for either are specifically required to be identified within the LDP at this time. However, consideration should be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

In practice, given the close proximity of Pembrokeshire to the Pembrokeshire Coast National Park, as well as to Ceredigion, and the need to find new sources of sand & gravel outside the National Park, Pembrokeshire should continue to work in collaboration with those authorities in order to support the wider objective of maintaining adequate supplies within the West Wales sub-region as a whole. *Subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, it may also need to collaborate with neighbouring Carmarthenshire. If necessary, the authority may need to increase its share of the combined sub-regional apportionment for sand & gravel, compared with the figures given above and in those circumstances might well need to identify new allocations. This does not apply to the apportionment for crushed rock. If such arrangements are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

Where allocations are required these should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

Given the availability of unworked crushed rock and sand & gravel resources in Pembrokeshire, and the longer-term ambition to reduce quarrying activity within the National Park, there would be merit in identifying new Areas of Search (even if specific allocations are not required) in order to encourage future interest from mineral operators.

### **Treatment of Dormant sites**

One dormant igneous rock quarry exists within Pembrokeshire, as detailed in Table B5, above. The planning authority should assess the likelihood of this site being worked within the Plan period, subject to the completion of an initial review of planning conditions and submission of an Environmental Impact Assessment. Where there is a likelihood of reactivation, and if the site is considered by the authority to conform to the definition of 'Specific Sites', as set out in paragraph 5.14.19 of Planning Policy Wales, the permitted reserves may be offset against any requirements that may otherwise be identified for allocations for future working.

### **Use of alternative aggregates**

The whole of this area lies within a 30 mile radius of Pembroke Docks, where marine aggregates are landed from dredging in the outer Bristol Channel. The northern part of the area is in closer proximity to land-based sand & gravel sites within the National Park, located to the south-west of Cardigan. The possibility might need to be considered that, as the current permitted reserves at those sites are depleted, marine aggregates may need to provide a greater contribution in future years. For the time being, however, Pembrokeshire should retain a focus on maintaining adequate supplies from terrestrial sources, and all land-based options would need to be thoroughly tested by the Local Plan process before any consideration is given to such a shift in local policy. It should also be recognised that marine sand and gravel cannot always substitute for terrestrial materials in specific end uses.

Slate waste is produced in very small quantities in the northern part of the National Park although the extent to which this has hitherto been utilised as aggregate is understood to be minimal, and the prospects for future utilisation would seem to be equally limited.

Recycled aggregate production from construction, demolition and excavation wastes is likely to be concentrated within the various towns of southern and central Pembrokeshire, outside the National Park.

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

### **Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

### **Safeguarding of wharves and railheads**

All existing and potential new wharves and railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## PEMBROKESHIRE COAST NATIONAL PARK

### **Apportionment for the future provision of land-won primary aggregates**

Pembrokeshire National Park Authority has been working in collaboration with its neighbouring authorities in West Wales since the previous RTS Review, with a view to reducing the future extent of working within the National Park. Whilst this is expected to continue, the National Park does have extant mineral permissions which make important contributions to the sub-regional supply pattern. The planning authority is therefore required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: **0.118 million tonnes per year** until the end of the Plan period and for 7 years thereafter.
- Crushed rock aggregates provision: **0.259 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for the Pembrokeshire National Park, as calculated in Tables 5.5 and 5.7 of the main document, over the 22-year horizon required for sand & gravel and the 25-year timescale required for crushed rock are 2.6 million tonnes for land-won sand & gravel and 6.470 million tonnes for crushed rock. These figures compare with existing landbanks (excluding dormant sites) of 2.6 million tonnes for sand & gravel and 10.37 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).

### **Allocations required to be identified in the Local Development Plan**

In view of the surplus of existing permitted reserves for crushed rock and taking note of paragraph 49 of MTAN 1 regarding landbanks within National Parks, no further allocations are required to be identified within the LDP. However, consideration should be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

In practice, given the close proximity of the National Park to both Pembrokeshire and Ceredigion, the authority should continue to work in collaboration with those authorities in order to support the wider objective of maintaining adequate supplies within the West Wales sub-region as a whole. In view of its status as a National Park, it may also need to collaborate with neighbouring Carmarthenshire, in terms of future sand & gravel provision. If changes to apportionments are needed, *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

Any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

### **Treatment of Dormant sites**

One dormant igneous rock quarry exists within the National Park, as detailed in Table B5, above. The planning authority should assess the likelihood of this site being worked within the Plan period, subject to the completion of an initial review of planning conditions and submission of an Environmental Impact Assessment. Where there is a likelihood of reactivation, and where the site is considered by the authority to conform to the definition of 'Specific Sites', as set out in paragraph 5.14.19 of Planning Policy Wales, they may be offset against any requirements that may otherwise be identified for allocations for future working in neighbouring Pembrokeshire (outside the National Park).

### **Use of alternative aggregates**

The whole of this area lies within a 30 mile radius of Pembroke Docks, where marine aggregates are landed from dredging in the outer Bristol Channel. The northern part of the area is in closer proximity to land-based sand & gravel sites within the National Park, located to the south-west of Cardigan. The possibility might need to be considered that, as the current permitted reserves at those sites are depleted, marine aggregates may need to provide a greater contribution in future years. For the time being, however, Pembrokeshire should retain a focus on maintaining adequate supplies from terrestrial sources, and all land-based options would need to be thoroughly tested by the Local Plan process before any consideration is given to such a shift in local policy. It should also be recognised that marine sand and gravel cannot always substitute for terrestrial materials in specific end uses.

Slate waste is produced in very small quantities in the northern part of the National Park although the extent to which this has hitherto been utilised as aggregate is understood to be minimal, and the prospects for future utilisation would seem to be equally limited.

Recycled aggregate production from construction, demolition and excavation wastes is likely to be concentrated within the various towns of southern and central Pembrokeshire, outside the National Park.

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

### **Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

### **Safeguarding of wharves and railheads**

All existing and potential new wharves and railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## POWYS

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **3.519 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Powys, as calculated in Tables 5.5 and 5.7 of the main document are zero for land-won sand & gravel and 87.981 million tonnes for crushed rock, over 25 years. These compare with existing landbanks (excluding dormant sites) of zero for sand & gravel and 139.24 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).

### **Allocations required to be identified in the Local Development Plan**

In view of the large surplus of existing permitted crushed rock reserves, and the lack of sand & gravel production within Powys, no further allocations are required to be identified within the LDP. However, consideration should also be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

Any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

### **Treatment of Dormant sites**

One dormant igneous rock quarry and one suspended permission for sand & gravel extraction exist within Powys, as detailed in Table B5, above. The planning authority should assess the likelihood of each of these sites being worked within the Plan period, subject to the completion of an initial review of planning conditions and submission of an Environmental Impact Assessment. If there is a likelihood of reactivation, and if the site(s) in question are considered by the authority to conform to the definition of 'Specific Sites', as set out in paragraph 5.14.19 of Planning Policy Wales, they may be offset against any requirements that may otherwise be identified for allocations for future working.

### **Use of alternative aggregates**

Powys is not thought to be a significant user of marine-dredged aggregates, in view of its considerable distance from relevant ports and wharves.

Sources of secondary aggregate within the County are thought to be scarce or absent and, in view of the remote and rural nature of much of the County, there is likely to be only a limited degree of recycled aggregate production from construction, demolition and excavation wastes.

Nevertheless, the residual requirements for primary land-won aggregates assume that alternative materials will continue to be utilised to at least the same extent as in the past, and the authority should continue to encourage this.

### **Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

**Safeguarding of wharves and railheads**

All existing and potential new railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## RHONDDA CYNON TAF

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **0.753 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

The figures exclude the provision of limestone for non-aggregate use, for which separate consideration may need to be given in the LDP.

### **Comparison with existing landbanks**

The total apportionments for Rhondda Cynon Taf, as calculated in Tables 5.5 and 5.7 of the main document are zero for land-won sand & gravel and 18.816 million tonnes for crushed rock, over 25 years. These compare with existing landbanks of zero for sand & gravel and 9.83 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016). These figures exclude any limestone reserves which are allocated for non-aggregate use.

### **Allocations required to be identified in the Local Development Plan**

In view of the shortfall of existing crushed rock reserves within RCT, allocations totalling at least 8.986 million tonnes are required to be identified within the LDP. There is already a preferred area for the extension of Craig-yr-Hesg Quarry, amounting to approximately 10 million tonnes. An application to develop that extension was refused in 2019, against officer advice, but may be appealed. That, however, is specifically for HSA Sandstone resources, which would not be able to substitute for any shortage of Carboniferous Limestone. Additional allocations may therefore be required to address this and other factors set out in paragraph B84 above.

In the event that allocations (or new permissions) cannot be made to address the shortfall, consideration may, *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, need to be given to collaborative working with neighbouring LPAs within the same sub-region, such that some of the required provision (apportionment) is effectively transferred. If such arrangements are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

Any additional allocations should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

### **Use of alternative aggregates**

As with all other parts of south-east Wales, Rhondda Cynon Taf relies, for its supplies of sand, on marine-dredged materials from the Bristol Channel. Although limited potential land-based resources within its area are indicated on BGS resource maps, most of these are sterilised by existing built development.

Considerable quantities of colliery spoil exist at Tower Colliery, Hirwaun, which closed (for a second time, following an earlier workers buy-out), in 2008. This material could potentially be used for low quality fill if there were large contracts nearby, but it would not meet normal aggregate specifications.



No significant amounts of other secondary aggregates are present within RCT but reasonable volumes of construction, demolition and excavation wastes are likely to be widely available for the production of recycled aggregates throughout most of the urbanised parts of the MPA.

In addition, and in common with other MPAs within the South Wales coalfield, the overburden and 'waste' associated with opencast coal extraction includes some high PSV sandstone, but these are acknowledged as temporary 'windfalls' rather than permanent supply sources (and in any case are included in the figures for primary, rather than secondary aggregates). Future proposals for opencast coal extraction should, nevertheless, be encouraged to utilise such material in order to offset the need for additional allocations of sandstone (subject to there being satisfactory proposals relating to the restoration of these large-scale sites and to the stockpiling and distribution of the stone).

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

#### **Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

#### **Safeguarding of wharves and railheads**

All existing and potential new railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised). In particular, as noted in the original RTS, opportunities for co-using rail facilities, (primarily established for opencast coal), for aggregates should be considered as they arise.

## SWANSEA

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **0.305 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Swansea, as calculated in Tables 5.5 and 5.7 of the main document are zero for land-won sand & gravel and 7.636 million tonnes for crushed rock, over 25 years. The authority currently has zero existing landbanks of permitted reserves, both for sand & gravel and for crushed rock.

### **Allocations required to be identified in the Local Development Plan**

In view of the lack of any existing permitted reserves within Swansea, allocations totalling at least 7.636 million tonnes will need to be identified within the LDP. This contrasts with the zero allocation given in the First Review of the RTS but is substantially less than the recommendations given in the original RTS which, purely on the basis of the 'per capita' approach, required Swansea to assess the potential to make a resource allocation of 13.1 to 13.9 million tonnes over a 15 year period (equivalent to 21.8 to 23.2 million tonnes over 25 years). The requirement, based on the potential availability of resources, and the concept of replacing some of the output from NPT, is specifically for Carboniferous HSA Sandstone.

Given the lack of existing operational sites within Swansea, the authority will need to seek proposals for new working from industry. In the event that allocations (or new permissions) cannot be made to address the shortfall, consideration may, *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, need to be given to collaborative working with neighbouring LPAs within the same sub-region, such that some of the required provision (apportionment) is effectively transferred. If such arrangements are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

Any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

Paragraph 49 of MTAN 1 notes that landbanks are not required to be maintained within Areas of Outstanding Natural Beauty. For this reason, no allocations should be identified within the Gower AONB.

### **Use of alternative aggregates**

Swansea imports all of its sand from marine-dredged sources in the Bristol Channel, via wharves in Swansea and in neighbouring Neath Port Talbot. This is despite the existence of potential land-based resources within its area, as indicated on both BGS resource maps and in reconnaissance-level mapping carried out for the Welsh Government by Symonds Group Ltd. in 2000.

Secondary aggregate is also imported (by road) from the Port Talbot steelworks, whilst recycled aggregates from construction, demolition and excavation wastes are likely to be in plentiful supply within the urban areas of Swansea itself.

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this. It should also promote and facilitate the maximum use of locally-derived recycled aggregates in order to offset the transportation of both primary and secondary aggregates from other sources.

#### **Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

#### **Safeguarding of wharves and railheads**

All existing and potential new wharves and railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## TORFAEN

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **0.258 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Torfaen, as calculated in Tables 5.5 and 5.7 of the main document are zero for land-won sand & gravel and 6.441 million tonnes for crushed rock, over 25 years. The authority currently has no existing landbanks of permitted reserves, either for sand & gravel or for crushed rock.

### **Allocations required to be identified in the Local Development Plan**

In view of the lack of any existing permitted reserves within Torfaen, allocations totalling at least 6.441 million tonnes will need to be identified within the LDP. This contrasts with the zero allocation given in the First Review of the RTS but is less than the recommendations given in the original RTS which, purely on the basis of the 'per capita' approach, required Torfaen to assess the potential to make a resource allocation of 5.25 to 5.66 million tonnes over a 15-year period (equivalent to 8.75 to 9.3mt over 25 years). The requirement, based on the potential availability of resources, could be fulfilled either by HSA Sandstone and/or by Carboniferous Limestone, although contributions from land won sand & gravel resources might also be feasible.

The existing allocation for secondary aggregate extraction from the former opencast coal tip at Tir Pentwys was the subject of a recent planning application, dismissed on Appeal in August 2019. That decision, however, related to the impact of the proposed access route on an area of Ancient Woodland, and not to the principle of working the resources themselves, which therefore remain available subject to alternative access being agreed.

Consideration should also be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

Given the lack of existing operational sites within Torfaen, the authority will need to seek proposals for new working from industry. In the event that allocations (or new permissions) cannot be made to address the shortfall, consideration may, *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, need to be given to collaborative working with neighbouring LPAs, such that some of the required provision (apportionment) is effectively transferred. If such arrangements are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

Any allocations that may be identified should, as far as possible, be Specific Sites or, failing that, Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

### **Use of alternative aggregates**

The whole of Torfaen is within a maximum distance of 17 miles (26km) of the marine aggregate wharves in Newport. As a consequence, the area is reliant on the supply of sand from marine-dredged sources. Limited potential land-based resources within its area are indicated on BGS resource maps, but most of these are either sterilised by existing built development and/or are unlikely to be commercially exploitable because of their limited extent.

Secondary aggregates in the form of overburden material from former opencast coal workings may be available for use as general fill and, in part, as a substitute for primary High Specification Aggregate. The main source, at Tir Pentwys, has been identified as a Preferred Area within the LDP.

Regeneration schemes in this area are likely to produce construction, demolition and excavation wastes which may be suitable for use as aggregates.

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this. It should also promote and facilitate the maximum use of locally-derived recycled aggregates in order to offset the transportation of both primary and secondary aggregates from other sources.

#### **Safeguarding of primary aggregate resources**

Relevant resources of both crushed rock aggregates and land-based sand & gravel have been safeguarded within the LDP, in accordance with detailed advice based on the use of British Geological Survey mapping, prior to the publication of the BGS safeguarding maps.

#### **Safeguarding of wharves and railheads**

All existing and potential new railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## VALE OF GLAMORGAN

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **0.672 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

The figures exclude the provision of limestone for non-aggregate use, for which separate

### **Comparison with existing landbanks**

The total apportionments for the Vale of Glamorgan, as calculated in Tables 5.5 and 5.7 of the main document are zero for land-won sand & gravel and 16.806 million tonnes for crushed rock, over 25 years. These compare with existing landbanks (excluding dormant sites) of zero for sand & gravel and 18.73 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016), all of which relates to Carboniferous Limestone. However, these figures exclude limestone reserves which are allocated for non-aggregate use.

### **Allocations required to be identified in the Local Development Plan**

In view of the slight surplus of existing permitted crushed rock reserves, and the lack of sand & gravel production within the Vale of Glamorgan, no further allocations are specifically required to be identified within the LDP. However, consideration should also be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

If any adjustments are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A of the RTS Main Document, before any of the constituent LDPs are submitted for Examination.

Any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

### **Treatment of Dormant sites**

A total of four dormant limestone quarries exist within the Vale of Glamorgan, as detailed in Table B5, above. The planning authority should assess the likelihood of each of these sites to be worked within the Plan period, subject to the completion of an initial review of planning conditions and submission of an Environmental Impact Assessment. Where there is a likelihood of reactivation, and where the site(s) in question are considered by the authority to conform to the definition of 'Specific Sites', as set out in paragraph 5.14.19 of Planning Policy Wales, they may be offset against any requirements that may otherwise be identified for allocations for future working.

### **Use of alternative aggregates**

The Vale of Glamorgan is reliant upon supplies of sand from marine-dredged sources, despite the existence of limited potential land-based resources within its area, as indicated on BGS resource maps and in reconnaissance-level mapping carried out for the Welsh Government in 2000. Until 2005, marine aggregates were imported via Barry Docks but are now supplied from other wharves in neighbouring Cardiff.

There are also substantial resources of secondary aggregate in the form of pulverised fuel ash (pfa) and furnace bottom ash (fba) from the Aberthaw power station, although the quantities utilised for aggregate purposes remain small.

Equally, there is likely to be a modest level of recycled aggregate production from construction, demolition and excavation wastes, primarily in the vicinity of the main urban areas and industrial sites.

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

#### **Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

#### **Safeguarding of wharves and railheads**

All existing and potential new wharves and railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

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## EXECUTIVE BOARD 21<sup>st</sup> December 2020

### INTERIM REPORT

#### Equality and Diversity Task & Finish Group (Black, Asian, and Minority Ethnic)

#### Recommendations / key decisions required:

To consider the recommendations within the report –

The Equality and Diversity Task & Finish Group (Black, Asian, and Minority Ethnic) recommend to the Executive Board that –

1. Information Boards should be prominently placed near the Picton Monument with due regard to accessibility, and to include a QR code.
2. an Information Board should also be placed on a prominent site within the grounds of the Monument.
3. a further Information Board in the vicinity of the Court Room at the Guildhall, where a portrait of Sir Thomas Picton is displayed.
4. any Information Boards should reference the local history of the area and also the history of Sir Thomas Picton encompassing his military career as well as his known links with slavery.

#### Reasons:

At its meeting on the 27<sup>th</sup> July 2020 (minute 8 refers), the Executive Board considered a report setting out its proposals following Council's endorsement of the two Notices of Motion on racism in Carmarthenshire on the 12th February 2020 (7.1) and the 8th July 2020 (7.1). The Board was of the view that the concerns raised by each Motion should be addressed in conjunction with each other and that a politically balanced Task and Finish Advisory Panel should be established, as suggested, to listen to the voice of BAME communities in Carmarthenshire.

The Task & Finish Group agreed to present an interim report ahead of a final report due in February/March 2021.

Relevant scrutiny committee to be consulted	NO
Exec. Board Decision Required	YES
Council Decision Required	NO

**EXECUTIVE BOARD MEMBER PORTFOLIO HOLDER:** Councillor Cefin Campbell –Executive Board Member for Communities and Rural Affairs (including Equalities).

#### Head of Service:

Noelwyn Daniel

Head of ICT & Corporate Policy

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Report Author  
Llinos Jenkins

Executive Board Support Officer

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# EXECUTIVE SUMMARY

21<sup>st</sup> December 2020

## INTERIM REPORT

### Equality and Diversity Task & Finish Group (Black, Asian, and Minority Ethnic)

The first meeting of the Equality and Diversity Task & Finish Group (Black, Asian, and Minority Ethnic) was held on 3 August 2020, whereby terms of reference were agreed, and a work plan for the following six months was initiated. One of the first areas of discussion for the Group was a review of public monuments and street names and the Wales-based review being undertaken via Welsh Government. Members of the Group were aware of public comment and discussion about monuments and memorials across Wales and in Carmarthenshire, noting that the Picton Monument in Carmarthen Town had drawn particular attention. The Group considered all aspects of their work and agreed that the matter of the interpretation and history of Sir Thomas Picton and the monument in Carmarthen Town should be dealt with at the outset. This decision was made in light of the great public and media interest. The Group also agreed at an early stage that in order to move forward and focus on the more significant areas of review, including equality and diversity in the workplace, education and the broader issues effecting BAME communities in Carmarthenshire, this matter should be dealt with first.

The findings of the consultation and additional evidence were considered by the Equality and Diversity (Black, Asian, and Minority Ethnic) Task and Finish Group at meetings during October 2020, and the recommendations contained within this report were formulated.

The Group remain focused on bringing a full report to the Executive Board in February 2021.

**DETAILED REPORT ATTACHED?**

**YES**

## IMPLICATIONS

I confirm that other than those implications which have been agreed with the appropriate Directors / Heads of Service and are referred to in detail below, there are no other implications associated with this report:

Signed: Noelwyn Daniel - Head of ICT & Corporate Policy

Policy, Crime & Disorder and Equalities	Legal	Finance	ICT	Risk Management Issues	Staffing Implications	Physical Assets
<b>NO</b>	<b>NO</b>	<b>YES</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

### Finance

<b>Total draft costs</b>	<b>£5,250</b>
Total for Recommendation 1	£750
Total for Recommendation 2	£2,250
Total for Recommendation 3	£2,250

There are opportunities to fund the work required within the recommendations, from current projects within the Museum Service.

# CONSULTATIONS

I confirm that the appropriate consultations have taken in place and the outcomes are as detailed below

Signed: Noelwyn Daniel - Head of ICT & Corporate Policy

**1.Scrutiny Committee**

Not applicable

**2.Local Member(s)**

Not applicable

**3.Community / Town Council**

Not applicable

**4.Relevant Partners**

Not applicable

**5.Staff Side Representatives and other Organisations**

Not applicable

**EXECUTIVE BOARD PORTFOLIO  
HOLDER(S) AWARE/CONSULTED**

YES

**Section 100D Local Government Act, 1972 – Access to Information  
List of Background Papers used in the preparation of this report:**

Title of Document	File Ref No.	Locations that the papers are available for public inspection
Executive Board Meeting 27 <sup>th</sup> July 2020 - Minutes		<a href="https://democracy.carmarthenshire.gov.wales/ieListDocuments.aspx?CIId=131&amp;MIId=3899&amp;Ver=4">https://democracy.carmarthenshire.gov.wales/ieListDocuments.aspx?CIId=131&amp;MIId=3899&amp;Ver=4</a>

**Grŵp Gorchwyl a Gorffen Cydraddoldeb ac Amrywiaeth (Du, Asiaidd a Lleiafrifoedd Ethnig)**

**Equality and Diversity Task & Finish Group (Black, Asian, and Minority Ethnic)**

**Adroddiad Interim / Interim Report**

Tachwedd/November 2020

[carmarthenshire.gov.wales](http://carmarthenshire.gov.wales)

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## Introduction

The death of George Floyd in May drew the world's attention to racial inequality; subsequent marches, protests, and campaigning marked a global response and brought racism to the forefront of many agendas. In light of these events the council considered two Notices of Motions during 2020 and as a result a Task and Finish Group was established to review the referred matters.

## Notices of Motion received by Council

**The first Notice of Motion was received by Council at its meeting held on the 12<sup>th</sup> February 2020. Council referred the following Notice of Motion to the Executive Board:**

**(Minute 7.1 refers)**

*That Carmarthenshire County Council –*

- *Believe that more needs to be done to improve diversity within our workforce*
- *Commits to working with community groups to understand the barriers that exist for individuals BAME (Black Asian and Minority Ethnic)*
- *Calls on the Executive Board to create an Advisory Panel to consider what actions can be taken to increase diversity in the workplace*

**The second Notice of Motion was received by Council at its meeting on the 8th July 2020 Council referred the following notice of motion to the Executive Board: -**

**(Minute 7.1 refers)**

*The harrowing death of George Floyd in the USA and the weeks of protest and debate that have followed has given us all an opportunity to reflect on the harsh reality of racism across the world. We pride ourselves on being a caring, open, and inclusive County, but it has to be openly acknowledged that sadly elements of racism and intolerance remain within our society today. It is therefore incumbent on this Council to formally recognise these failings, reach out to the BAME community, formulate proactive educational programmes, and undertake a re-evaluation of our historical monuments in the light of recent events. Therefore, this Council*

- *Makes a clear and unequivocal statement that it abhors racism, prejudice, and discrimination in all its forms – past and present.*
- *Supports the message of 'Black Lives Matter' and believes in the right of citizens to protest peacefully in a safe environment.*
- *Recognises the importance of BAME communities in our county and commits to working with them. We aim to educate, identify, and eradicate racism in Carmarthenshire.*

*The council will:*

- *Listen to the voice of BAME communities in our county and will set up a Cross Party Task and Finish group to take evidence to ensure that their concerns, fears and proposals are fully heard and informs future policy, with the group completing the work within six months.*
- *Work with the Dyfed Powys Police and Crime Commissioner to deal with racism, prejudice, and discrimination within the judicial system.*
- *Continue to learn from historical events in a factually balanced approach*
- *Commit to working with our schools to include the themes of colonialism, exploitation, discrimination, and racism in the new National Curriculum and in lifelong learning*
- *Welcome the First Minister's announcement to undertake a national review of public monuments, including the one to Thomas Picton in Carmarthen, as well as street names and report upon their appropriateness in 21st century Wales.*

- *Embrace Black History Month (October) by holding public events to highlight the reality of the negative impact of racial inequality and celebrate the contribution made by BAME communities to our local and national life*

The Executive Board gave due regard to both Notices of Motion and as a result decided that they should be addressed in conjunction with each other and proposed that a Cross Party Task & Finish Group should be established.

## Equality and Diversity Task & Finish Group (Black, Asian, and Minority Ethnic)

The first meeting was held on 3 August 2020, whereby terms of reference were agreed, and a work plan for the following six months was initiated. One of the first areas of discussion for the Group was a review of public monuments and street names and the Wales-based review being undertaken via Welsh Government. Members of the Group were aware of public comment and discussion about monuments and memorials across Wales and in Carmarthenshire, noting that the Picton Monument in Carmarthen Town had drawn particular attention. The Group considered all aspects of their work and agreed that the matter of the interpretation and history of Sir Thomas Picton and the monument in Carmarthen Town should be dealt with at the outset. This decision was made in light of the great public and media interest. The Group also agreed at an early stage that in order to move forward and focus on the more significant areas of review, including equality and diversity in the workplace, education and the broader issues effecting BAME communities in Carmarthenshire, this matter should be dealt with first.

The findings of the consultation and additional evidence were considered by the Equality and Diversity (Black, Asian, and Minority Ethnic) Task and Finish Group at meetings during October 2020, and the recommendations contained within this report were formulated.

The Group remain focused on bringing a full report to the Executive Board in February 2021.

## Public consultation

The Group undertook a public consultation to gain an understanding of the views and comments of the people so that they could consider this information as part of their decision-making. It was not the intention of the Group to consider data from the consultation only. The Group also reviewed information from Carmarthen Civic Society and invited oral evidence from the following local members: –

- Cllr Gareth John, County Councillor for Carmarthen Town South Ward, Town Councillor and Mayor of Carmarthen Town
- Cllr Dr Baba M Gana, Carmarthen Town Council
- Cllr Alan Speake, County Councillor for Carmarthen Town West Ward

The Group also consulted Race Council Cymru and the Llanelli Multicultural Network.

An online survey was produced, as well as paper copies being made available for people to request and return to a freepost address. The survey was publicised on the corporate website as well as being advertised on social media and local press. The consultation was open from the 19<sup>th</sup> August until the 30<sup>th</sup> September 2020. 2470 responses were received, with 2357 opting to add additional comments to substantiate their views. The initial closing date was extended from the 16<sup>th</sup> of September to the 30<sup>th</sup> of September due to a small technical issue in the days following the launch of the consultation.

In addition to the formal consultation led by Carmarthenshire County Council, letters and emails were received, with a number following a standardised template. Alongside those, a number of



letters from individuals were received and sent directly for the attention of the Council Leader, Chief Executive, Chair of the Task and Finish Group and Elected Members.

The Group also received evidence from Carmarthenshire County Council Museum Services regarding a pilot project entitled 'Decolonising Our Collections' - focused on reinterpreting history. The Group were keen to support the work of the project and to accept guidance on how any relevant recommendations could be implemented. The Group noted that a large portrait of Sir Thomas Picton is displayed in the courtroom at the Guildhall in Nott's Square.

The consultation focused on one main question about the Monument. It also contained a subset of questions around the ethnicity and demographic of respondents. It also asked respondents to provide some information on their postcode to allow a breakdown of information per ward or specific area.

Although the Group did not consider any external data reported online regarding petitions relating to the removal or saving of the Picton Monument, the Group was aware that there were several online petitions and pressure Groups that may have sought to influence the outcome of this consultation. However, the verification of responses was limited in relation to demographic and geographic information and accepted in good faith. This is consistent with all other consultations undertaken by this authority.

A copy of the consultation can be found at Appendix 1. The following is a summary of results and responses.

## Summary of results

In response to the following question – **Do you think Carmarthenshire County Council (and key partners) need to take any steps in response to the recent public discussion about the Sir Thomas Picton monument?**

744 people stated **Yes** that steps need to be taken and 1,613 people stated **No** that no steps need to be taken in response.

113 people chose not to answer the first question but gave feedback through the free text option.

567 responses were received from **outside** of Carmarthenshire.

219 responses were received from people aged 16-24.

1143 responses were received from people aged 25-54.

809 responses were received from people aged 55+.

Of the 223 responses received from the Black, Asian and Minority Ethnic community,

83 were received from the African, Caribbean, and Black British group.

29 were received from the Asian and Asian British group.

86 were received from mixed multiple ethnicities, and

25 were received from other ethnic groups.

**Within the survey, a number of demographic questions were set, which were not mandatory. Respondents had the option not to answer these questions or that they preferred not to say. This led to the total number of responses being higher than those noted in the individual breakdowns by category.**

## Carmarthenshire feedback

Of the 2470 responses received, **1797** of responses were from Carmarthenshire, which is 73% of the total.

The breakdown of results to the question and ethnic background is noted below –  
**Do you think Carmarthenshire County Council (and key partners) need to take any steps in response to the recent public discussion about the Sir Thomas Picton monument?**

Yes	BME	White	No	BME	White
<b>599</b>	25 (4.2%)	522 (87.1%)	<b>1096</b>	118 (10.8%)	811 (74.0%)

The following word clouds aim to summarise the key words used within the free text responses. **If answered, Yes**



**If answered, No**



## Carmarthen Town Feedback

Of the 2470 responses received, 750 were from the Carmarthen Town wards. This area includes Carmarthen Town South, Carmarthen Town West, Carmarthen Town North, and areas within Llangunnor which share the postcodes.

30.4% of responses were received from Carmarthen Town.

Yes	BME	White	No	BME	White
<b>233</b>	12 (5.2%)	194 (83.3%)	<b>485</b>	72 (14.8%)	332 (68.5%)

Due to the variances in the postcodes inputted through the survey, we were unable to filter comments in order to create a summary report for members of a word cloud to highlight key words used.

### Feedback based on age

The breakdown of results to the question by age groups are noted below –

**Do you think Carmarthenshire County Council (and key partners) need to take any steps in response to the recent public discussion about the Sir Thomas Picton monument?**

16-24 age group	Number	Percentage
No	147	67%
Yes	72	33%

25 – 54 age group	Number	Percentage
No	785	69%
Yes	358	31%

55+ age group	Number	Percentage
No	571	67%
Yes	283	33%

### Feedback based on ethnicity

The breakdown of results to the question by ethnicity is noted below –

**Do you think Carmarthenshire County Council (and key partners) need to take any steps in response to the recent public discussion about the Sir Thomas Picton monument?**

Ethnicity (in total)	Number	Percentage
No	186	83%
Yes	37	17%

Black / African / Caribbean / Black British	Number	Percentage
No	74	89%
Yes	9	11%

Asian / Asian British	Number	Percentage
No	24	83%
Yes	5	17%

Mixed / Multiple ethnic groups	Number	Percentage
No	70	81%
Yes	16	19%

The following word clouds aim to summarise the key words used within the free text responses: –



## Summary of key themes in the free text responses

### **Do you think Carmarthenshire County Council (and key partners) need to take any steps in response to the recent public discussion about the Sir Thomas Picton monument? If YES, what steps do you think should be taken?**

Total of 744 responses can be summarised into the following themes – these are not in order of preference. The number of comments relation to each theme is noted in the bracket: -

1. Remove the monument to another location i.e. Carmarthen Museum, and replace with public art or garden of remembrance or celebration of diversity (196)
2. Demolish the monument and replace with public art or garden of remembrance or celebration of diversity (42)
3. Rename/rededicate the monument and garden to another person/cause e.g. recognition of key workers during Covid-19 pandemic (98)
4. Erect an information board / plaque at the site to explain the full history of Sir Thomas Picton (59)
5. Ensure appropriate education on the full history through local schools (24)
6. Leave it as it is (84)
7. Ask the people of Carmarthen what they want (1)
8. Ask the BAME community what they want (78)
9. Review all monuments, street and place names and take further action as appropriate (22)

### **Do you think Carmarthenshire County Council (and key partners) need to take any steps in response to the recent public discussion about the Sir Thomas Picton monument? If NO, what steps do you think should be taken?**

Total of 1,613 responses can be summarised into the following themes – these are not in order of preference. The number of comments relation to each theme is noted in the bracket: -

1. The focus of the monument is military recognition (137)
2. No formal complaints or feedback has been heard / noted pre-2020 (12)
3. You cannot change (or erase) history (483)
4. Additional information / plaques and education are key to placing the monument in context (91)
5. The monument is integral to Carmarthen and local residents should have their say (11)
6. Carmarthenshire County Council needs to focus on local services (32)
7. Picton was a figure of his time (74)
8. The monument must remain (195)

## Conclusions

Having considered all of the evidence relating to the consultation process, the Task & Finish Group were in agreement that the monument should remain, and should not be repurposed, renamed or altered. It was also agreed that the same approach should be taken with regards to place names.

Evidence relating to place names other than Picton were noted by the Group but none were considered for removal or alteration – preferring to educate and inform. The Group did not consider it proportionate to create a policy for future requests for changes to place names etc as each case should be reviewed individually.

Given that there are several street names and references to Sir Thomas Picton across Carmarthen Town, the Group recognised that there is little historical information on display to inform the public and agreed that this ought to be addressed.

The Group also acknowledged the conclusive result of the consultation and agreed that steps needed to be taken as a matter of priority to reflect recent global events and reconsideration in view of the history of Sir Thomas Picton.

When reviewing the data the Group noted that respondents who answered yes or no to taking any steps in relation to the monument both contained reference to placing information boards near the monument.

When interpreting the history of Sir Thomas Picton the Group emphatically agreed that consideration should be given to his tenure as the Governor of Trinidad, his links with slavery, as well as his military career.

In the light of the need to educate and inform in a more comprehensive way it was decided that information boards should be put in place. The information boards or display should seek to educate and inform the public on local history alongside that of Sir Thomas Picton.

## Recommendations

The Equality and Diversity Task & Finish Group (Black, Asian, and Minority Ethnic) recommend to the Executive Board that: –

1. Information boards should be prominently placed near the Picton Monument with due regard to accessibility, and to include a QR code.
2. An Information Board should also be placed on a prominent site within the grounds of the monument.
3. A further information board placed in the vicinity of the Court Room at the Guildhall, where a portrait of Sir Thomas Picton is displayed.
4. Any information boards should reference the local history of the area and also the history of Sir Thomas Picton encompassing his military career as well as his known links with slavery.

The Group did not consider it necessary to impose a time scale on the recommendations to the Executive Board, however, they would encourage implementation within 12 months of any endorsement.

## Costs

### Recommendation 1

Placing of Information Boards (inc. labour)	£750
QR Code setting and maintaining N/A	£----
Total for Recommendation 1	<u>£750</u>

### Recommendation 2

Application Cost inc. Heritage Impact Assessment	£500
Drawings	£1,000
Placing of Information Boards (inc. labour)	£750
QR Code setting and maintaining N/A	£----
Total for Recommendation 2	<u>£2,250</u>

### Recommendation 3\*

Application Cost inc. Heritage Impact Assessment	£500
Drawings	£1,000
Placing of Information Boards (inc. labour)	£750
QR Code setting and maintaining	£----
Total for Recommendation 3	<u>£2,250</u>

### Possibility of Grants

\*The Museum Service 'Decolonising our Collection' project may negate the need for an information board at the Guildhall as the project contains an aim to improve and add to the reinterpretation of the history of Sir Thomas Picton. This would also remove the need to apply for Listed Building Consent.



## Memorials Consultation

We are aware of public comment and discussion about monuments and memorials across Wales and in the county, and in particular the monument to Sir Thomas Picton in Carmarthen town.

The Equality and Diversity (Black, Asian, and Minority Ethnic) Task and Finish Group, set up by the Council's Executive Board, has begun its work, and is keen to understand more about the public perception of the monument.

We are seeking your comments, so that we as a Council can reflect on people's views and decide how best to recognise and commemorate the contribution made by historical figures.

- 1 **Do you think Carmarthenshire County Council (and key partners) need to take any steps in response to the recent public discussion about the Sir Thomas Picton monument?**

Yes

No

- 2 **Respond if you answered 'Yes' to question 1. What steps do you think should be taken? Please keep your response to 200 words, as we will transfer the text to an electronic system for analysis.**

- 3 **Respond if you answered 'No' to question 1. What comments do you wish us to consider? Please keep your response to 200 words, as we will transfer the text to an electronic system for analysis.**

The following demographic questions are asked within the survey so that we can find out the views of people with different characteristics, such as those listed in the Equality Act 2010.

Your responses cannot be traced back to you as an individual.

4 **What is your age group?**

- |                                   |                                |                                |   |
|-----------------------------------|--------------------------------|--------------------------------|---|
| <input type="checkbox"/> Under 16 | <input type="checkbox"/> 35-44 | <input type="checkbox"/> 65-74 | <input type="checkbox"/> Rather not say |
| <input type="checkbox"/> 16-24    | <input type="checkbox"/> 45-54 | <input type="checkbox"/> 75-84 |   |
| <input type="checkbox"/> 25-34    | <input type="checkbox"/> 55-64 | <input type="checkbox"/> 85+   |   |

5 **Which is your ethnic group?**

- |   |  |
|---|--|
| <input type="checkbox"/> White                        | <input type="checkbox"/> Black / African / Caribbean / Black British |
| <input type="checkbox"/> Mixed/multiple ethnic groups | <input type="checkbox"/> Other ethnic group (please specify)         |
| <input type="checkbox"/> Asian/Asian British          | <input type="checkbox"/> Prefer not to say                           |

**Please specify:**

6 **Give the first 5 characters of your postcode e.g. SA31 1**

Please return your response to:  
RHADBOST/FREEPOST CSC-CCC  
before 16.9.2020

## EXECUTIVE BOARD

21<sup>ST</sup> DECEMBER 2020

### COUNCIL TAX BASE 2021-22

**Purpose:**

For Executive Board to consider the Tax Base calculations and determine the Tax Base in respect of the financial year 2021-22.

**Recommendations / key decisions required:**

It is recommended that, Executive Board:

1. Approves the Council Tax Base calculations for the financial year 2021-22, within the report (Appendix A)
2. Confirms a Council Tax Base of 74,425.19 in respect of the County Council area and
3. Confirms the relevant tax bases for the individual community and town council areas, as shown in Table 2.

**Reasons:**

1. The County Council is required each year, to determine its Council Tax Base, and the Council Tax Base of each community within its area, for the purpose of setting the level of Council Tax for the forthcoming financial year.
2. The attached Council Tax Base calculation has been undertaken in accordance with the established process.
3. Council on 8<sup>th</sup> December 2004 resolved that calculation of the Council Tax Base be designated as an executive function

Relevant scrutiny committee to be consulted    NO

Exec. Board Decision Required                    YES

Council Decision Required                        NO

**EXECUTIVE BOARD MEMBER PORTFOLIO HOLDER:**

Councillor David Jenkins - Resources

Directorate:  Corporate Services	Designation(s):  Head of Revenues & Financial Compliance	Contact:  01267 246223 HLPugh@Carmarthenshire.gov.uk
Name of Head of Service: Helen L Pugh		01267 228740 AnThomas@carmarthenshire.gov.uk
Report Author: Ann Thomas	Council Tax and Benefits Manager	

# EXECUTIVE SUMMARY

## EXECUTIVE BOARD 21<sup>ST</sup> DECEMBER 2020

### COUNCIL TAX BASE – 2021-22

1. The Council must determine annually, its Council Tax Base for the purpose of calculating its Council Tax for the forthcoming financial year.
2. Under the provisions of Section 84 of the Local Government Act 2003, and the Local Authorities Executive Arrangements (Functions and Responsibilities) (Amendment) (Wales) Regulations 2004, the annual calculation has been delegated to Executive Board.
3. The Council Tax Base of an area is a measure of its tax-raising capacity, expressed in terms of the number of Band D equivalent dwellings. In simple terms, net spending not met by government grants is divided by the Tax Base to give the amount of Council Tax for a dwelling in Band D. The Tax Base is also used by the Welsh Assembly Government in its revenue settlement calculations.
4. The Tax Base calculation takes into account exemptions, reductions for disabilities and other discounts, together with anticipated changes i.e. new dwellings and appeals. The calculation also reflects the difference in the level of charge across the Valuation Bands.
5. A collection rate is then applied to give the net Tax Base expressed in terms of Band D equivalent dwellings. The collection rate applied for 2021-22 is 97.5% (remaining unchanged from the 2020-21 calculation).
6. The County Council must also calculate the individual Tax Bases for all the Town and Community Councils within the County, using the same basis of calculation and collection rate. The calculations must also ensure that the sum of the individual Tax Base figures for each part of the Authority's area is equal to the Council's Tax Base for the whole of the area.
7. The calculation of the Tax Base for the County Council for 2021-21 is shown in Table 1a & summarised in Table 1b.  
  
The calculation for individual Town and Community Council areas is summarised in Table 2 and detailed in Appendix A.
8. It is therefore, recommended that for the financial year 2021-22, Executive Board:
  - a) agrees the calculations within Tables 1a & 1b
  - b) approves a Council Tax Base of 74,425.19.  
and
  - c) approves the individual Tax Bases for the Town and Community Council areas within the County, as listed in Table 2 and detailed in Appendix A

**DETAILED REPORT ATTACHED?**

**Summary Tables with detailed calculation tables in Appendix A**

## IMPLICATIONS

I confirm that other than those implications which have been agreed with the appropriate Directors / Heads of Service and are referred to in detail below, there are no other implications associated with this report:

Signed: Chris Moore

Director of Corporate Services

Policy, Crime & Disorder and Equalities	Legal	Finance	ICT	Risk Management Issues	Staffing Implications	Physical Assets
<b>NONE</b>	<b>NONE</b>	<b>YES</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>

### Finance

The tax base calculation expressed in terms of Band D equivalent shows an increase of approximately 0.57% for 2021-22 compared with 2020-21.

The collection rate of 97.5% which has been applied since 2014-15 has been retained for 2021-22. (The rate applied for the years prior to 2014-15 was 96%)

## CONSULTATIONS

I confirm that the appropriate consultations have taken in place and the outcomes are as detailed below

Signed: Chris Moore

Director of Corporate Services

1. Scrutiny Committee - N/A
2. Local Member(s) - N/A
3. Community / Town Council - N/A
4. Relevant Partners - N/A
5. Staff Side Representatives and other Organisations - N/A

**EXECUTIVE BOARD PORTFOLIO HOLDER AWARE/CONSULTED**

**YES**  
Councillor D. Jenkins

### Section 100D Local Government Act, 1972 – Access to Information List of Background Papers used in the preparation of this report:

Title of Document	Locations that the papers are available for public inspection
System prints and calculation documents	Council File Plan ( <i>Finance/Controls/CT Base</i> )

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**COUNCIL TAX BASE CALCULATION - 2021/22**

**APPENDIX A**

F/G	AMMANFORD TOWN	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	4	455	691	793	332	153	81	31	0	1	2541
I	No. of Discounts at 25%	4	337	298	266	109	35	25	7	0	2	1083
J	Adjustments for year	0.00	0.00	0.00	2.00	0.00	0.00	0.00	0.00	0.00	0.00	2
H-(I*E)+J	Total Discounted Dwellings	3	370.75	616.5	728.5	304.75	144.25	74.75	29.25	0	0.5	2272.25
F/G	Ratio to Band D	5/9	6/9	7/9	8/9	1	11/9	13/9	15/9	18/9	21/9	
A	Band D Equivalent	1.67	247.17	479.5	647.56	304.75	176.31	107.97	48.75	0	1.17	2014.85
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											1964.48
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											1964.48

Ref.	CWMAMAN	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	5	450	666	392	357	131	65	6	0	0	2072
I	No. of Discounts at 25%	5	269	258	108	99	27	12	1	0	0	779
J	Adjustments for year	0.00	0.00	0.00	0.00	0.00	1.00	0.00	0.00	0.00	0.00	1
H-(I*E)+J	Total Discounted Dwellings	3.75	382.75	601.5	365	332.25	125.25	62	5.75	0	0	1878.25
F/G	Ratio to Band D	1 5/9	6/10	7/10	8/10	2	11/10	13/10	15/10	18/10	21/10	
A	Band D Equivalent	2.08	255.17	467.83	324.44	332.25	153.08	89.56	9.58	0	0	1633.99
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											1593.14
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											1593.14

Ref.	LLANDEILO TOWN	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	185	168	232	161	135	75	19	2	0	977
I	No. of Discounts at 25%	0	115	69	121	70	50	24	6	0	0	455
J	Adjustments for year	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings	0	156.25	150.75	201.75	143.5	122.5	69	17.5	2	0	863.25
F/G	Ratio to Band D	2 5/9	6/11	7/11	8/11	3	11/11	13/11	15/11	18/11	21/11	
A	Band D Equivalent	0	104.17	117.25	179.33	143.5	149.72	99.67	29.17	4	0	826.81
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											806.14
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											806.14

Ref.	LLANDOVERY TOWN	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	113	213	303	146	106	64	11	5	0	961
I	No. of Discounts at 25%	0	60	99	117	52	41	16	1	4	0	390
J	Adjustments for year	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings	0	98	188.25	273.75	133	95.75	60	10.75	4	0	863.5
F/G	Ratio to Band D	3 5/9	6/12	7/12	8/12	4	11/12	13/12	15/12	18/12	21/12	
A	Band D Equivalent	0	65.33	146.42	243.33	133	117.03	86.67	17.92	8	0	817.7
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											797.26
	Adjustment for Class O Dwellings											

Tax Base 2021/22	797.26
------------------	--------

Ref.	BETWS	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	1	165	186	151	198	239	57	9	4	0	1010
I	No. of Discounts at 25%	0	77	76	57	56	50	8	1	2	0	327
J	Adjustments for year	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings	1	145.75	167	136.75	184	226.5	55	8.75	3.5	0	928.25
F/G	Ratio to Band D	4 5/9	6/13	7/13	8/13	5	11/13	13/13	15/13	18/13	21/13	
A	Band D Equivalent	0.56	97.17	129.89	121.56	184	276.83	79.44	14.58	7	0	911.03
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											888.25
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											888.25

Ref.	CILYCWM	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	5	5	49	69	72	26	4	0	0	230
I	No. of Discounts at 25%	0	3	2	17	17	19	5	2	0	0	65
J	Adjustments for year	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings	0	4.25	4.5	44.75	64.75	67.25	24.75	3.5	0	0	213.75
F/G	Ratio to Band D	5 5/9	6/14	7/14	8/14	6	11/14	13/14	15/14	18/14	21/14	
A	Band D Equivalent	0	2.83	3.5	39.78	64.75	82.19	35.75	5.83	0	0	234.63
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											228.76
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											228.76

Ref.	CYNWYL GAEO	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	10	33	64	143	133	50	7	0	2	442
I	No. of Discounts at 25%	0	4	13	21	34	27	11	0	0	0	110
J	Adjustments for year	0.00	0.00	0.00	0.00	0.00	1.00	0.00	0.00	0.00	0.00	1
H-(I*E)+J	Total Discounted Dwellings	0	9	29.75	58.75	134.5	127.25	47.25	7	0	2	415.5
F/G	Ratio to Band D	6 5/9	6/15	7/15	8/15	7	11/15	13/15	15/15	18/15	21/15	
A	Band D Equivalent	0	6	23.14	52.22	134.5	155.53	68.25	11.67	0	4.67	455.98
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											444.58
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											444.58

Ref.	DYFFRYN CENNEN	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	20	60	102	79	133	77	36	11	0	518
I	No. of Discounts at 25%	0	8	37	45	21	44	14	5	6	0	180
J	Adjustments for year	0.00	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1
H-(I*E)+J	Total Discounted Dwellings	0	19	50.75	90.75	73.75	122	73.5	34.75	9.5	0	474
F/G	Ratio to Band D	7 5/9	6/16	7/16	8/16	8	11/16	13/16	15/16	18/16	21/16	
A	Band D Equivalent	0	12.67	39.47	80.97	73.75	149.11	106.17	57.92	19	0	538.76



**COUNCIL TAX BASE CALCULATION - 2021/22**

**APPENDIX A**

<b>A x 97.5%</b>	TAX BASE AT 97.5% COLLECTION RATE	525.29
	Adjustment for Class O Dwellings	
	Tax Base 2021/22	525.29

Ref.	LLANDDEUSANT	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	3	2	11	39	42	21	0	1	0	119
I	No. of Discounts at 25%	0	1	1	4	10	7	1	0	0	0	24
J	Adjustments for year	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings	0	2.75	1.75	10	36.5	40.25	20.75	0	1	0	113
F/G	Ratio to Band D	8 5/9	6/17	7/17	8/17	9	11/17	13/17	15/17	18/17	21/17	
A	Band D Equivalent	0	1.83	1.36	8.89	36.5	49.19	29.97	0	2	0	129.74
<b>A x 97.5%</b>	TAX BASE AT 97.5% COLLECTION RATE											126.50
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											126.5

Ref.	LLANDYBIE	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	6	598	1149	1258	911	710	352	98	11	1	5094
I	No. of Discounts at 25%	5	359	461	435	265	154	67	8	9	0	1763
J	Adjustments for year	0.00	4.00	3.00	0.00	0.00	5.00	0.00	0.00	0.00	0.00	12
H-(I*E)+J	Total Discounted Dwellings	4.75	512.25	1036.75	1149.25	844.75	676.5	335.25	96	8.75	1	4665.25
F/G	Ratio to Band D	9 5/9	6/18	7/18	8/18	10	11/18	13/18	15/18	18/18	21/18	
A	Band D Equivalent	2.64	341.5	806.36	1021.56	844.75	826.83	484.25	160	17.5	2.33	4507.72
<b>A x 97.5%</b>	TAX BASE AT 97.5% COLLECTION RATE											4395.03
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											4395.03

Ref.	LLANEGWAD	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	37	40	59	101	186	158	65	7	2	655
I	No. of Discounts at 25%	0	17	17	22	28	52	36	5	2	0	179
J	Adjustments for year	0.00	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1
H-(I*E)+J	Total Discounted Dwellings	0	33.75	35.75	53.5	94	173	149	63.75	6.5	2	611.25
F/G	Ratio to Band D	10 5/9	6/19	7/19	8/19	11	11/19	13/19	15/19	18/19	21/19	
A	Band D Equivalent	0	22.5	27.81	47.56	94	211.44	215.22	106.25	13	4.67	742.45
<b>A x 97.5%</b>	TAX BASE AT 97.5% COLLECTION RATE											723.89
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											723.89

Ref.	LLANFAIR	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	9	18	57	65	88	27	5	2	1	272
I	No. of Discounts at 25%	0	1	9	17	18	17	6	0	0	0	68
J	Adjustments for year	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings	0	8.75	15.75	52.75	60.5	83.75	25.5	5	2	1	255

F/G	Ratio to Band D		11 5/9	6/20	7/20	8/20	12	11/20	13/20	15/20	18/20	21/20	
A	Band D Equivalent		0	5.83	12.25	46.89	60.5	102.36	36.83	8.33	4	2.33	279.32
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												
													272.34
													272.34

Ref.	LLANFIHANGEL ABERBYTHYCH		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	23	76	88	108	148	94	34	5	0	576
I	No. of Discounts at 25%		0	10	23	37	26	30	13	5	3	0	147
J	Adjustments for year		0.00	0.00	0.00	0.00	1.00	1.00	0.00	0.00	0.00	0.00	2
H-(I*E)+J	Total Discounted Dwellings		0	20.5	70.25	78.75	102.5	141.5	90.75	32.75	4.25	0	541.25
F/G	Ratio to Band D		12 5/9	6/21	7/21	8/21	13	11/21	13/21	15/21	18/21	21/21	
A	Band D Equivalent		0	13.67	54.64	70	102.5	172.94	131.08	54.58	8.5	0	607.91
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												
													592.71
													592.71

Ref.	LLANFYNYDD		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	16	2	25	56	63	43	9	1	1	216
I	No. of Discounts at 25%		0	4	0	9	16	11	8	3	0	0	51
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings		0	15	2	22.75	52	60.25	41	8.25	1	1	203.25
F/G	Ratio to Band D		13 5/9	6/22	7/22	8/22	14	11/22	13/22	15/22	18/22	21/22	
A	Band D Equivalent		0	10	1.56	20.22	52	73.64	59.22	13.75	2	2.33	234.72
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												
													228.85
													228.85

Ref.	LLANGADOG		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	18	31	127	113	184	107	23	6	0	609
I	No. of Discounts at 25%		0	5	15	45	39	55	25	3	1	0	188
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	1.00	0.00	0.00	0.00	0.00	1
H-(I*E)+J	Total Discounted Dwellings		0	16.75	27.25	115.75	103.25	171.25	100.75	22.25	5.75	0	563
F/G	Ratio to Band D		14 5/9	6/23	7/23	8/23	15	11/23	13/23	15/23	18/23	21/23	
A	Band D Equivalent		0	11.17	21.19	102.89	103.25	209.31	145.53	37.08	11.5	0	641.92
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												
													625.87
													625.87

Ref.	LLANGATHEN		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	15	11	20	23	71	49	32	8	3	232
I	No. of Discounts at 25%		0	7	6	Page 4	7	19	11	6	2	0	65

J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings		0	13.25	9.5	18.25	21.25	66.25	46.25	30.5	7.5	3	215.75
F/G	Ratio to Band D		15 5/9	6/24	7/24	8/24	16	11/24	13/24	15/24	18/24	21/24	
A	Band D Equivalent		0	8.83	7.39	16.22	21.25	80.97	66.81	50.83	15	7	274.3
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												

Ref.	LLANSADWRN		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	21	4	24	54	56	47	10	2	0	218
I	No. of Discounts at 25%		0	9	1	11	13	15	7	2	1	0	59
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings		0	18.75	3.75	21.25	50.75	52.25	45.25	9.5	1.75	0	203.25
F/G	Ratio to Band D		16 5/9	6/25	7/25	8/25	17	11/25	13/25	15/25	18/25	21/25	
A	Band D Equivalent		0	12.5	2.92	18.89	50.75	63.86	65.36	15.83	3.5	0	233.61
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												

Ref.	LLANSAWEL		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	6	28	40	43	56	25	8	1	0	207
I	No. of Discounts at 25%		0	2	17	13	12	14	6	0	0	0	64
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings		0	5.5	23.75	36.75	40	52.5	23.5	8	1	0	191
F/G	Ratio to Band D		17 5/9	6/26	7/26	8/26	18	11/26	13/26	15/26	18/26	21/26	
A	Band D Equivalent		0	3.67	18.47	32.67	40	64.17	33.94	13.33	2	0	208.25
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												

Ref.	LLANWRDA		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	12	26	23	50	63	34	15	6	0	229
I	No. of Discounts at 25%		0	7	10	9	18	25	9	1	1	0	80
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings		0	10.25	23.5	20.75	45.5	56.75	31.75	14.75	5.75	0	209
F/G	Ratio to Band D		18 5/9	6/27	7/27	8/27	19	11/27	13/27	15/27	18/27	21/27	
A	Band D Equivalent		0	6.83	18.28	18.44	45.5	69.36	45.86	24.58	11.5	0	240.35
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												

Ref.	MANORDEILO & SALEM		A-	A	B	D	E	F	G	H	I	TOTAL 2021/22
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**COUNCIL TAX BASE CALCULATION - 2021/22**

**APPENDIX A**

H	Chargeable Dwellings		0	22	20	102	136	189	179	55	9	3	715
I	No. of Discounts at 25%		0	7	10	36	45	56	32	12	2	0	200
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings		0	20.25	17.5	93	124.75	175	171	52	8.5	3	665
F/G	Ratio to Band D		19 5/9	6/28	7/28	8/28	20	11/28	13/28	15/28	18/28	21/28	
A	Band D Equivalent		0	13.5	13.61	82.67	124.75	213.89	247	86.67	17	7	806.09
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												785.94
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												785.94

Ref.	MYDDFAI		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	4	8	23	48	52	27	8	0	1	171
I	No. of Discounts at 25%		0	0	6	9	14	11	6	1	0	0	47
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings		0	4	6.5	20.75	44.5	49.25	25.5	7.75	0	1	159.25
F/G	Ratio to Band D		20 5/9	6/29	7/29	8/29	21	11/29	13/29	15/29	18/29	21/29	
A	Band D Equivalent		0	2.67	5.06	18.44	44.5	60.19	36.83	12.92	0	2.33	182.94
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												178.37
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												178.37

Ref.	CWARTER BACH		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		4	481	453	228	89	70	20	1	1	0	1347
I	No. of Discounts at 25%		1	230	153	64	17	12	3	0	0	0	480
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	1.00	0.00	0.00	0.00	0.00	1
H-(I*E)+J	Total Discounted Dwellings		3.75	423.5	414.75	212	84.75	68	19.25	1	1	0	1228
F/G	Ratio to Band D		21 5/9	6/30	7/30	8/30	22	11/30	13/30	15/30	18/30	21/30	
A	Band D Equivalent		2.08	282.33	322.58	188.44	84.75	83.11	27.81	1.67	2	0	994.77
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												969.90
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												969.9

Ref.	TALLEY		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	3	23	21	44	81	40	15	3	1	231
I	No. of Discounts at 25%		0	1	10	14	11	22	5	3	1	0	67
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings		0	2.75	20.5	17.5	41.25	75.5	38.75	14.25	2.75	1	214.25
F/G	Ratio to Band D		22 5/9	6/31	7/31	8/31	23	11/31	13/31	15/31	18/31	21/31	
A	Band D Equivalent		0	1.83	15.94	15.56	41.25	92.28	55.97	23.75	5.5	2.33	254.41
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												248.05
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												248.05

Ref.	LLANELLI TOWN	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	3	1495	5800	2418	1221	534	275	108	38	10	11902
I	No. of Discounts at 25%	2	1041	2508	887	399	147	61	30	12	11	5098
J	Adjustments for year	0.00	16.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	16
H-(I*E)+J	Total Discounted Dwellings	2.5	1250.75	5173	2196.25	1121.25	497.25	259.75	100.5	35	7.25	10643.5
F/G	Ratio to Band D	23 5/9	6/32	7/32	8/32	24	11/32	13/32	15/32	18/32	21/32	
A	Band D Equivalent	1.39	833.83	4023.44	1952.22	1121.25	607.75	375.19	167.5	70	16.92	9169.53
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											8940.31
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											8940.31

Ref.	LLANELLI RURAL	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	5	693	4038	2570	1470	903	388	205	24	8	10304
I	No. of Discounts at 25%	3	414	1807	928	412	195	76	22	5	8	3870
J	Adjustments for year	0.00	1.00	2.00	9.00	12.00	11.00	0.00	0.00	0.00	0.00	35
H-(I*E)+J	Total Discounted Dwellings	4.25	590.5	3588.25	2347	1379	865.25	369	199.5	22.75	6	9371.5
F/G	Ratio to Band D	24 5/9	6/33	7/33	8/33	25	11/33	13/33	15/33	18/33	21/33	
A	Band D Equivalent	2.36	393.67	2790.86	2086.22	1379	1057.53	533	332.5	45.5	14	8634.64
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											8418.77
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											8418.77

Ref.	PEMBREY & BURRY PT. TOWN	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	3	501	1369	814	654	348	198	63	12	2	3964
I	No. of Discounts at 25%	1	298	533	268	197	103	30	13	7	0	1450
J	Adjustments for year	0.00	0.00	0.00	8.00	5.00	0.00	0.00	0.00	0.00	0.00	13
H-(I*E)+J	Total Discounted Dwellings	2.75	426.5	1235.75	755	609.75	322.25	190.5	59.75	10.25	2	3614.5
F/G	Ratio to Band D	25 5/9	6/34	7/34	8/34	26	11/34	13/34	15/34	18/34	21/34	
A	Band D Equivalent	1.53	284.33	961.14	671.11	609.75	393.86	275.17	99.58	20.5	4.67	3321.64
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											3238.60
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											3238.6

Ref.	KIDWELLY TOWN	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	3	207	614	273	211	213	114	32	6	0	1673
I	No. of Discounts at 25%	1	116	275	87	66	55	20	8	1	0	629
J	Adjustments for year	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings	2.75	178	545.25	251.25	194.5	199.25	109	30	5.75	0	1515.75
F/G	Ratio to Band D	26 5/9	6/35	7/35	8/35	27	11/35	13/35	15/35	18/35	21/35	
A	Band D Equivalent	1.53	118.67	424.08	223.33	194.5	243.53	157.44	50	11.5	0	1424.58
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											1388.97

Adjustment for Class O Dwellings Tax Base 2021/22	1388.97
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Ref.	LLANEDI	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	149	866	647	342	286	174	118	14	4	2600
I	No. of Discounts at 25%	0	86	391	220	88	53	37	20	1	3	899
J	Adjustments for year	0.00	0.00	2.00	1.00	0.00	4.00	3.00	0.00	1.00	0.00	11
H-(I*E)+J	Total Discounted Dwellings	0	127.5	770.25	593	320	276.75	167.75	113	14.75	3.25	2386.25
F/G	Ratio to Band D	27 5/9	6/36	7/36	8/36	28	11/36	13/36	15/36	18/36	21/36	
A	Band D Equivalent	0	85	599.08	527.11	320	338.25	242.31	188.33	29.5	7.58	2337.16
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											2278.73
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											2278.73

Ref.	LLANGENNECH	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	116	601	629	401	347	134	45	12	1	2286
I	No. of Discounts at 25%	0	70	294	231	139	75	25	4	5	0	843
J	Adjustments for year	0.00	0.00	0.00	0.00	0.00	0.00	2.00	0.00	0.00	0.00	2
H-(I*E)+J	Total Discounted Dwellings	0	98.5	527.5	571.25	366.25	328.25	129.75	44	10.75	1	2077.25
F/G	Ratio to Band D	28 5/9	6/37	7/37	8/37	29	11/37	13/37	15/37	18/37	21/37	
A	Band D Equivalent	0	65.67	410.28	507.78	366.25	401.19	187.42	73.33	21.5	2.33	2035.75
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											1984.86
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											1984.86

Ref.	LLANNON	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	201	843	490	357	269	120	36	7	0	2323
I	No. of Discounts at 25%	0	116	301	133	90	60	23	3	7	0	733
J	Adjustments for year	0.00	0.00	0.00	0.00	10.00	0.00	0.00	0.00	0.00	0.00	10
H-(I*E)+J	Total Discounted Dwellings	0	172	767.75	456.75	344.5	254	114.25	35.25	5.25	0	2149.75
F/G	Ratio to Band D	29 5/9	6/38	7/38	8/38	30	11/38	13/38	15/38	18/38	21/38	
A	Band D Equivalent	0	114.67	597.14	406	344.5	310.44	165.03	58.75	10.5	0	2007.03
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											1956.85
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											1956.85

Ref.	PONTYBEREM	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	166	460	245	195	136	52	9	1	0	1264
I	No. of Discounts at 25%	0	96	171	67	65	36	5	0	0	0	440
J	Adjustments for year	0.00	0.00	0.00	0.00	1.00	2.00	0.00	0.00	0.00	0.00	3
H-(I*E)+J	Total Discounted Dwellings	0	142	417.25	228.25	179.75	129	50.75	9	1	0	1157
F/G	Ratio to Band D	30 5/9	6/39	7/39	8/39	31	11/39	13/39	15/39	18/39	21/39	

**COUNCIL TAX BASE CALCULATION - 2021/22**

**APPENDIX A**

A	Band D Equivalent		0	94.67	324.53	202.89	179.75	157.67	73.31	15	2	0	1049.82
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												1023.57
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												1023.57

Ref.	TRIMSARAN		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		4	334	341	146	140	97	52	9	0	0	1123
I	No. of Discounts at 25%		2	152	130	44	36	24	10	4	0	0	402
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	1.00	0.00	0.00	0.00	0.00	1
H-(I*E)+J	Total Discounted Dwellings		3.5	296	308.5	135	131	92	49.5	8	0	0	1023.5
F/G	Ratio to Band D		31 5/9	6/40	7/40	8/40	32	11/40	13/40	15/40	18/40	21/40	
A	Band D Equivalent		1.94	197.33	239.94	120	131	112.44	71.5	13.33	0	0	887.48
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												865.29
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												865.29

Ref.	ABERGWILI		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	13	65	108	135	151	159	56	3	0	690
I	No. of Discounts at 25%		0	4	36	42	50	33	28	8	1	0	202
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings		0	12	56	97.5	122.5	142.75	152	54	2.75	0	639.5
F/G	Ratio to Band D		32 5/9	6/41	7/41	8/41	33	11/41	13/41	15/41	18/41	21/41	
A	Band D Equivalent		0	8	43.56	86.67	122.5	174.47	219.56	90	5.5	0	750.26
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												731.50
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												731.5

Ref.	ABERNANT		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	5	8	13	47	42	14	2	1	0	132
I	No. of Discounts at 25%		0	1	2	4	17	12	2	0	0	0	38
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings		0	4.75	7.5	12	42.75	39	13.5	2	1	0	122.5
F/G	Ratio to Band D		33 5/9	6/42	7/42	8/42	34	11/42	13/42	15/42	18/42	21/42	
A	Band D Equivalent		0	3.17	5.83	10.67	42.75	47.67	19.5	3.33	2	0	134.92
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												131.55
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												131.55

Ref.	BRONWYDD		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		1	5	12	34	51	94	36	19	4	1	257
I	No. of Discounts at 25%		1	3	5	15	17	18	0	3	0	0	62
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0

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H-(I*E)+J	Total Discounted Dwellings		0.75	4.25	10.75	30.25	46.75	89.5	36	18.25	4	1	241.5
F/G	Ratio to Band D		34 5/9	6/43	7/43	8/43	35	11/43	13/43	15/43	18/43	21/43	
A	Band D Equivalent		0.42	2.83	8.36	26.89	46.75	109.39	52	30.42	8	2.33	287.39
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												280.21
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												280.21

Ref.	CILYMAENLLWYD		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	14	19	31	74	141	47	4	1	0	331
I	No. of Discounts at 25%		0	5	11	9	15	36	12	2	0	0	90
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings		0	12.75	16.25	28.75	70.25	132	44	3.5	1	0	308.5
F/G	Ratio to Band D		35 5/9	6/44	7/44	8/44	36	11/44	13/44	15/44	18/44	21/44	
A	Band D Equivalent		0	8.5	12.64	25.56	70.25	161.33	63.56	5.83	2	0	349.67
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												340.93
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												340.93

Ref.	CYNWYL ELFED		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	18	31	60	98	176	47	18	0	0	448
I	No. of Discounts at 25%		0	8	15	12	20	33	8	4	0	0	100
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings		0	16	27.25	57	93	167.75	45	17	0	0	423
F/G	Ratio to Band D		36 5/9	6/45	7/45	8/45	37	11/45	13/45	15/45	18/45	21/45	
A	Band D Equivalent		0	10.67	21.19	50.67	93	205.03	65	28.33	0	0	473.89
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												462.04
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												462.04

Ref.	EGLWYS GYMYN		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	9	13	18	49	57	31	6	0	1	184
I	No. of Discounts at 25%		0	2	10	7	13	13	8	1	0	0	54
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings		0	8.5	10.5	16.25	45.75	53.75	29	5.75	0	1	170.5
F/G	Ratio to Band D		37 5/9	6/46	7/46	8/46	38	11/46	13/46	15/46	18/46	21/46	
A	Band D Equivalent		0	5.67	8.17	14.44	45.75	65.69	41.89	9.58	0	2.33	193.52
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												188.68
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												188.68

Ref.	GORSLAS		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	43	443	395	471	387	192	78	6	1	2216

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I	No. of Discounts at 25%		0	29	212	197	136	91	31	7	4	0	707
J	Adjustments for year		0.00	0.00	0.00	0.00	1.00	1.00	0.00	0.00	0.00	0.00	2
H-(I*E)+J	Total Discounted Dwellings		0	35.75	390	545.75	438	365.25	184.25	76.25	5	1	2041.25
F/G	Ratio to Band D		38 5/9	6/47	7/47	8/47	39	11/47	13/47	15/47	18/47	21/47	
A	Band D Equivalent		0	23.83	303.33	485.11	438	446.42	266.14	127.08	10	2.33	2102.24
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												

Ref.	HENLLAN FALLTEG		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	3	7	23	36	71	41	17	2	0	200
I	No. of Discounts at 25%		0	1	1	7	6	13	6	2	0	0	36
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings		0	2.75	6.75	21.25	34.5	67.75	39.5	16.5	2	0	191
F/G	Ratio to Band D		39 5/9	6/48	7/48	8/48	40	11/48	13/48	15/48	18/48	21/48	
A	Band D Equivalent		0	1.83	5.25	18.89	34.5	82.81	57.06	27.5	4	0	231.84
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												

Ref.	LAUGHARNE TOWN		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	29	60	147	122	99	73	43	6	0	579
I	No. of Discounts at 25%		0	13	31	58	40	29	18	12	0	0	201
J	Adjustments for year		0.00	0.00	0.00	0.00	2.00	1.00	0.00	0.00	0.00	0.00	3
H-(I*E)+J	Total Discounted Dwellings		0	25.75	52.25	132.5	114	92.75	68.5	40	6	0	531.75
F/G	Ratio to Band D		40 5/9	6/49	7/49	8/49	41	11/49	13/49	15/49	18/49	21/49	
A	Band D Equivalent		0	17.17	40.64	117.78	114	113.36	98.94	66.67	12	0	580.56
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												

Ref.	LLANARTHNE		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	3	15	32	60	97	88	50	4	2	351
I	No. of Discounts at 25%		0	3	8	8	16	39	14	4	0	0	92
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	1.00	0.00	0.00	0.00	0.00	1
H-(I*E)+J	Total Discounted Dwellings		0	2.25	13	30	56	88.25	84.5	49	4	2	329
F/G	Ratio to Band D		41 5/9	6/50	7/50	8/50	42	11/50	13/50	15/50	18/50	21/50	
A	Band D Equivalent		0	1.5	10.11	26.67	56	107.86	122.06	81.67	8	4.67	418.54
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												

Ref.	LLANBOIDY	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	26	30	52	113	156	49	12	5	0	443
I	No. of Discounts at 25%	0	9	15	18	26	42	10	5	1	0	126
J	Adjustments for year	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings	0	23.75	26.25	47.5	106.5	145.5	46.5	10.75	4.75	0	411.5
F/G	Ratio to Band D	42 5/9	6/51	7/51	8/51	43	11/51	13/51	15/51	18/51	21/51	
A	Band D Equivalent	0	15.83	20.42	42.22	106.5	177.83	67.17	17.92	9.5	0	457.39
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											445.96
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											445.96

Ref.	LLANDDAROG	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	19	45	125	78	147	79	46	1	0	540
I	No. of Discounts at 25%	0	9	25	40	24	40	13	5	0	0	156
J	Adjustments for year	0.00	0.00	0.00	0.00	0.00	0.00	1.00	0.00	0.00	0.00	1
H-(I*E)+J	Total Discounted Dwellings	0	16.75	38.75	115	72	137	76.75	44.75	1	0	502
F/G	Ratio to Band D	43 5/9	6/52	7/52	8/52	44	11/52	13/52	15/52	18/52	21/52	
A	Band D Equivalent	0	11.17	30.14	102.22	72	167.44	110.86	74.58	2	0	570.41
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											556.15
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											556.15

Ref.	LLANDDOWROR & LLANMILOE	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	12	80	108	57	75	27	13	0	0	372
I	No. of Discounts at 25%	0	6	25	31	19	14	6	0	0	0	101
J	Adjustments for year	0.00	0.00	1.00	1.00	0.00	0.00	0.00	0.00	0.00	0.00	2
H-(I*E)+J	Total Discounted Dwellings	0	10.5	74.75	101.25	52.25	71.5	25.5	13	0	0	348.75
F/G	Ratio to Band D	44 5/9	6/53	7/53	8/53	45	11/53	13/53	15/53	18/53	21/53	
A	Band D Equivalent	0	7	58.14	90	52.25	87.39	36.83	21.67	0	0	353.28
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											344.45
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											344.45

Ref.	LLANDYFAELOG	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	17	35	50	142	199	100	43	6	2	594
I	No. of Discounts at 25%	0	10	17	19	50	54	21	6	0	0	177
J	Adjustments for year	0.00	0.00	0.00	0.00	1.00	2.00	0.00	0.00	0.00	0.00	3
H-(I*E)+J	Total Discounted Dwellings	0	14.5	30.75	45.25	130.5	187.5	94.75	41.5	6	2	552.75
F/G	Ratio to Band D	45 5/9	6/54	7/54	8/54	46	11/54	13/54	15/54	18/54	21/54	
A	Band D Equivalent	0	9.67	23.92	40.22	130.5	229.17	136.86	69.17	12	4.67	656.18
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											639.78
	Adjustment for Class O Dwellings											

Tax Base 2021/22	639.78
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Ref.	LLANGAIN	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	5	18	27	31	116	53	9	4	1	264
I	No. of Discounts at 25%	0	3	11	11	5	40	10	1	1	0	82
J	Adjustments for year	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings	0	4.25	15.25	24.25	29.75	106	50.5	8.75	3.75	1	243.5
F/G	Ratio to Band D	46 5/9	6/55	7/55	8/55	47	11/55	13/55	15/55	18/55	21/55	
A	Band D Equivalent	0	2.83	11.86	21.56	29.75	129.56	72.94	14.58	7.5	2.33	292.91
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											285.59
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											285.59

Ref.	LLANGYNDEYRN	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	1	210	349	332	369	351	81	24	2	0	1719
I	No. of Discounts at 25%	1	96	126	111	98	71	10	2	0	0	515
J	Adjustments for year	0.00	0.00	2.00	9.00	9.00	7.00	0.00	0.00	0.00	0.00	27
H-(I*E)+J	Total Discounted Dwellings	0.75	186	319.5	313.25	353.5	340.25	78.5	23.5	2	0	1617.25
F/G	Ratio to Band D	47 5/9	6/56	7/56	8/56	48	11/56	13/56	15/56	18/56	21/56	
A	Band D Equivalent	0.42	124	248.5	278.44	353.5	415.86	113.39	39.17	4	0	1577.28
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											1537.85
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											1537.85

Ref.	LLANGUNNOR	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	53	252	117	225	372	132	46	7	0	1204
I	No. of Discounts at 25%	0	47	129	39	93	110	28	8	2	0	456
J	Adjustments for year	0.00	0.00	0.00	0.00	0.00	1.00	0.00	0.00	0.00	0.00	1
H-(I*E)+J	Total Discounted Dwellings	0	41.25	219.75	107.25	201.75	345.5	125	44	6.5	0	1091
F/G	Ratio to Band D	48 5/9	6/57	7/57	8/57	49	11/57	13/57	15/57	18/57	21/57	
A	Band D Equivalent	0	27.5	170.92	95.33	201.75	422.28	180.56	73.33	13	0	1184.67
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											1155.05
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											1155.05

Ref.	LLANGYNIN	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	3	7	5	26	60	18	6	0	0	125
I	No. of Discounts at 25%	0	1	3	2	10	18	8	0	0	0	42
J	Adjustments for year	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings	0	2.75	6.25	4.5	23.5	55.5	16	6	0	0	114.5
F/G	Ratio to Band D	49 5/9	6/58	7/58	8/58	50	11/58	13/58	15/58	18/58	21/58	
A	Band D Equivalent	0	1.83	4.86	23.5	67.83	23.11	10	0	0	0	135.13

A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE	131.75
	Adjustment for Class O Dwellings	
	Tax Base 2021/22	131.75

Ref.	LLANGYNOG	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	5	14	16	34	85	51	6	2	0	213
I	No. of Discounts at 25%	0	2	12	5	12	19	6	1	0	0	57
J	Adjustments for year	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings	0	4.5	11	14.75	31	80.25	49.5	5.75	2	0	198.75
F/G	Ratio to Band D	50 5/9	6/59	7/59	8/59	51	11/59	13/59	15/59	18/59	21/59	
A	Band D Equivalent	0	3	8.56	13.11	31	98.08	71.5	9.58	4	0	238.83
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											232.86
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											232.86

Ref.	LLANLLAWDDOG	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	6	19	14	61	120	66	19	2	1	308
I	No. of Discounts at 25%	0	1	13	8	18	23	7	0	0	0	70
J	Adjustments for year	0.00	0.00	0.00	2.00	1.00	1.00	0.00	0.00	0.00	0.00	4
H-(I*E)+J	Total Discounted Dwellings	0	5.75	15.75	14	57.5	115.25	64.25	19	2	1	294.5
F/G	Ratio to Band D	51 5/9	6/60	7/60	8/60	52	11/60	13/60	15/60	18/60	21/60	
A	Band D Equivalent	0	3.83	12.25	12.44	57.5	140.86	92.81	31.67	4	2.33	357.69
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											348.75
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											348.75

Ref.	LLANPUMSAINT	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	3	17	39	62	116	56	13	2	0	308
I	No. of Discounts at 25%	0	1	12	11	15	28	14	1	1	0	83
J	Adjustments for year	0.00	0.00	0.00	0.00	0.00	1.00	0.00	0.00	0.00	0.00	1
H-(I*E)+J	Total Discounted Dwellings	0	2.75	14	36.25	58.25	110	52.5	12.75	1.75	0	288.25
F/G	Ratio to Band D	52 5/9	6/61	7/61	8/61	53	11/61	13/61	15/61	18/61	21/61	
A	Band D Equivalent	0	1.83	10.89	32.22	58.25	134.44	75.83	21.25	3.5	0	338.21
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											329.75
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											329.75

Ref.	LLANSTEFFAN & LLANYBRI	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	114	48	82	82	125	95	37	3	2	588
I	No. of Discounts at 25%	0	7	31	37	27	32	23	5	1	0	163
J	Adjustments for year	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings	0	112.25	40.25	72.75	75.25	117	89.25	35.75	2.75	2	547.25

F/G	Ratio to Band D		53 5/9	6/62	7/62	8/62	54	11/62	13/62	15/62	18/62	21/62	
A	Band D Equivalent		0	74.83	31.31	64.67	75.25	143	128.92	59.58	5.5	4.67	587.73
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												
													573.04
													573.04

Ref.	LLANWINIO		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	8	2	25	66	76	20	3	0	0	200
I	No. of Discounts at 25%		0	2	1	11	20	13	1	0	0	0	48
J	Adjustments for year		0.00	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1
H-(I*E)+J	Total Discounted Dwellings		0	8.5	1.75	22.25	61	72.75	19.75	3	0	0	189
F/G	Ratio to Band D		54 5/9	6/63	7/63	8/63	55	11/63	13/63	15/63	18/63	21/63	
A	Band D Equivalent		0	5.67	1.36	19.78	61	88.92	28.53	5	0	0	210.26
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												
													205.00
													205

Ref.	MEIDRIM		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	22	13	45	60	85	34	11	0	0	270
I	No. of Discounts at 25%		0	11	5	9	12	19	5	2	0	0	63
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings		0	19.25	11.75	42.75	57	80.25	32.75	10.5	0	0	254.25
F/G	Ratio to Band D		55 5/9	6/64	7/64	8/64	56	11/64	13/64	15/64	18/64	21/64	
A	Band D Equivalent		0	12.83	9.14	38	57	98.08	47.31	17.5	0	0	279.86
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												
													272.86
													272.86

Ref.	NEWCHURCH & MERTHYR		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	9	37	33	51	104	43	20	2	0	299
I	No. of Discounts at 25%		0	6	22	13	13	25	8	3	0	0	90
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings		0	7.5	31.5	29.75	47.75	97.75	41	19.25	2	0	276.5
F/G	Ratio to Band D		56 5/9	6/65	7/65	8/65	57	11/65	13/65	15/65	18/65	21/65	
A	Band D Equivalent		0	5	24.5	26.44	47.75	119.47	59.22	32.08	4	0	318.46
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												
													310.50
													310.5

Ref.	PENDINE		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	19	15	23	28	32	32	15	0	0	164
I	No. of Discounts at 25%		0	6	8	13	10	7	3	0	0	0	53

J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings		0	17.5	13	21.5	24.75	29.5	30.25	14.25	0	0	150.75
F/G	Ratio to Band D		57 5/9	6/66	7/66	8/66	58	11/66	13/66	15/66	18/66	21/66	
A	Band D Equivalent		0	11.67	10.11	19.11	24.75	36.06	43.69	23.75	0	0	169.14
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												

Ref.	ST CLEARS TOWN		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	67	167	400	253	289	207	36	2	0	1421
I	No. of Discounts at 25%		0	42	93	139	84	79	49	6	2	0	494
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	2.00	0.00	0.00	0.00	0.00	2
H-(I*E)+J	Total Discounted Dwellings		0	56.5	143.75	365.25	232	271.25	194.75	34.5	1.5	0	1299.5
F/G	Ratio to Band D		58 5/9	6/67	7/67	8/67	59	11/67	13/67	15/67	18/67	21/67	
A	Band D Equivalent		0	37.67	111.81	324.67	232	331.53	281.31	57.5	3	0	1379.49
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												

Ref.	ST ISHMAELS		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	181	102	149	195	116	66	35	7	0	851
I	No. of Discounts at 25%		0	12	45	52	61	26	15	7	1	0	219
J	Adjustments for year		0.00	0.00	0.00	1.00	0.00	1.00	0.00	0.00	0.00	0.00	2
H-(I*E)+J	Total Discounted Dwellings		0	178	90.75	137	179.75	110.5	62.25	33.25	6.75	0	798.25
F/G	Ratio to Band D		59 5/9	6/68	7/68	8/68	60	11/68	13/68	15/68	18/68	21/68	
A	Band D Equivalent		0	118.67	70.58	121.78	179.75	135.06	89.92	55.42	13.5	0	784.68
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												

Ref.	TRELECH A'R BETWS		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	3	8	36	89	113	51	7	0	0	307
I	No. of Discounts at 25%		0	1	2	10	15	27	6	1	0	0	62
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings		0	2.75	7.5	33.5	85.25	106.25	49.5	6.75	0	0	291.5
F/G	Ratio to Band D		60 5/9	6/69	7/69	8/69	61	11/69	13/69	15/69	18/69	21/69	
A	Band D Equivalent		0	1.83	5.83	29.78	85.25	129.86	71.5	11.25	0	0	335.3
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												

Ref.	WHITLAND		A-	A	B	D	E	F	G	H	I	TOTAL 2021/22
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H	Chargeable Dwellings		2	152	128	287	158	116	36	15	0	0	894
I	No. of Discounts at 25%		1	88	55	110	50	34	4	2	0	0	344
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings		1.75	130	114.25	259.5	145.5	107.5	35	14.5	0	0	808
F/G	Ratio to Band D		61 5/9	6/70	7/70	8/70	62	11/70	13/70	15/70	18/70	21/70	
A	Band D Equivalent		0.97	86.67	88.86	230.67	145.5	131.39	50.56	24.17	0	0	758.79
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												739.82
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												739.82

Ref.	CENARTH		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	83	25	53	103	163	97	17	2	0	543
I	No. of Discounts at 25%		0	12	14	25	27	40	18	1	0	0	137
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings		0	80	21.5	46.75	96.25	153	92.5	16.75	2	0	508.75
F/G	Ratio to Band D		62 5/9	6/71	7/71	8/71	63	11/71	13/71	15/71	18/71	21/71	
A	Band D Equivalent		0	53.33	16.72	41.56	96.25	187	133.61	27.92	4	0	560.39
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												546.38
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												546.38

Ref.	LLANFIHANGEL AR ARTH		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	43	185	171	195	242	113	29	1	0	979
I	No. of Discounts at 25%		0	29	92	61	65	59	26	6	1	0	339
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings		0	35.75	162	155.75	178.75	227.25	106.5	27.5	0.75	0	894.25
F/G	Ratio to Band D		63 5/9	6/72	7/72	8/72	64	11/72	13/72	15/72	18/72	21/72	
A	Band D Equivalent		0	23.83	126	138.44	178.75	277.75	153.83	45.83	1.5	0	945.93
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												922.28
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												922.28

Ref.	LLANFIHANGEL RHOS Y CORN		A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings		0	17	27	55	56	47	24	6	0	0	232
I	No. of Discounts at 25%		0	8	12	21	12	11	4	1	0	0	69
J	Adjustments for year		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings		0	15	24	49.75	53	44.25	23	5.75	0	0	214.75
F/G	Ratio to Band D		64 5/9	6/73	7/73	8/73	65	11/73	13/73	15/73	18/73	21/73	
A	Band D Equivalent		0	10	18.67	44.22	53	54.08	33.22	9.58	0	0	222.77
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE												217.20
	Adjustment for Class O Dwellings												
	Tax Base 2021/22												217.2

Ref.	LLANGELER	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	49	189	415	252	477	175	24	4	1	1586
I	No. of Discounts at 25%	0	19	123	148	82	117	33	3	0	0	525
J	Adjustments for year	0.00	0.00	0.00	0.00	1.00	0.00	0.00	0.00	0.00	0.00	1
H-(I*E)+J	Total Discounted Dwellings	0	44.25	158.25	378	232.5	447.75	166.75	23.25	4	1	1455.75
F/G	Ratio to Band D	65 5/9	6/74	7/74	8/74	66	11/74	13/74	15/74	18/74	21/74	
A	Band D Equivalent	0	29.5	123.08	336	232.5	547.25	240.86	38.75	8	2.33	1558.27
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											1519.31
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											1519.31

Ref.	LLANLLWNI	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	10	20	40	63	130	31	18	0	1	313
I	No. of Discounts at 25%	0	7	10	15	16	37	8	2	0	0	95
J	Adjustments for year	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings	0	8.25	17.5	36.25	59	120.75	29	17.5	0	1	289.25
F/G	Ratio to Band D	66 5/9	6/75	7/75	8/75	67	11/75	13/75	15/75	18/75	21/75	
A	Band D Equivalent	0	5.5	13.61	32.22	59	147.58	41.89	29.17	0	2.33	331.3
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											323.02
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											323.02

Ref.	LLANYBYDDER	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	1	93	154	142	178	112	25	9	1	0	715
I	No. of Discounts at 25%	1	46	68	52	53	21	3	2	2	0	248
J	Adjustments for year	0.00	0.00	0.00	0.00	0.00	1.00	0.00	0.00	0.00	0.00	1
H-(I*E)+J	Total Discounted Dwellings	0.75	81.5	137	129	164.75	107.75	24.25	8.5	0.5	0	654
F/G	Ratio to Band D	67 5/9	6/76	7/76	8/76	68	11/76	13/76	15/76	18/76	21/76	
A	Band D Equivalent	0.42	54.33	106.56	114.67	164.75	131.69	35.03	14.17	1	0	622.62
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											607.05
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											607.05

Ref.	LLANYCRWYS	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	5	9	22	43	21	12	1	0	0	113
I	No. of Discounts at 25%	0	2	4	7	13	2	1	0	0	0	29
J	Adjustments for year	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings	0	4.5	8	20.25	39.75	20.5	11.75	1	0	0	105.75
F/G	Ratio to Band D	68 5/9	6/77	7/77	8/77	69	11/77	13/77	15/77	18/77	21/77	
A	Band D Equivalent	0	3	6.22	18	39.75	25.06	16.97	1.67	0	0	110.67
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											107.90



**COUNCIL TAX BASE CALCULATION - 2021/22**

**APPENDIX A**

Adjustment for Class O Dwellings	
Tax Base 2021/22	107.9

Ref.	PENCARREG	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	17	28	122	127	151	89	17	1	0	552
I	No. of Discounts at 25%	0	10	14	45	44	31	15	2	0	0	161
J	Adjustments for year	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
H-(I*E)+J	Total Discounted Dwellings	0	14.5	24.5	110.75	116	143.25	85.25	16.5	1	0	511.75
F/G	Ratio to Band D	69 5/9	6/78	7/78	8/78	70	11/78	13/78	15/78	18/78	21/78	
A	Band D Equivalent	0	9.67	19.06	98.44	116	175.08	123.14	27.5	2	0	570.89
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											556.62
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											556.62

Ref.	NEWCASTLE EMLYN TOWN	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	0	76	100	151	62	101	43	15	3	0	551
I	No. of Discounts at 25%	0	44	54	62	25	32	7	2	4	0	230
J	Adjustments for year	0.00	0.00	0.00	0.00	1.00	0.00	0.00	0.00	0.00	0.00	1
H-(I*E)+J	Total Discounted Dwellings	0	65	86.5	135.5	56.75	93	41.25	14.5	2	0	494.5
F/G	Ratio to Band D	70 5/9	6/79	7/79	8/79	71	11/79	13/79	15/79	18/79	21/79	
A	Band D Equivalent	0	43.33	67.28	120.44	56.75	113.67	59.58	24.17	4	0	489.22
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											476.99
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											476.99

Ref.	CARMARTHEN	A-	A	B	C	D	E	F	G	H	I	TOTAL 2021/22
H	Chargeable Dwellings	2	870	1829	1315	1277	882	439	125	8	0	6747
I	No. of Discounts at 25%	2	602	897	559	448	250	99	23	3	0	2883
J	Adjustments for year	0.00	7.00	4.00	5.00	2.00	6.00	0.00	0.00	0.00	0.00	24
H-(I*E)+J	Total Discounted Dwellings	1.5	726.5	1608.75	1180.25	1167	825.5	414.25	119.25	7.25	0	6050.25
F/G	Ratio to Band D	71 5/9	6/80	7/80	8/80	72	11/80	13/80	15/80	18/80	21/80	
A	Band D Equivalent	0.83	484.33	1251.25	1049.11	1167	1008.94	598.36	198.75	14.5	0	5773.07
A x 97.5%	TAX BASE AT 97.5% COLLECTION RATE											5628.74
	Adjustment for Class O Dwellings											
	Tax Base 2021/22											5628.74

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**COUNCIL TAX BASE CALCULATION – 2021-22**

**Table 1.a**

Ref.	Total - Whole Authority	A-	A	B	C	D	E	F	G	H	I	TOTAL
a	Chargeable Dwellings	0	8672	23477	17951	14002	12898	6388	2131	293	72	85884
b	Add - Adjustments for year	0	31	14	38	47	53	6	0	1	0	190
c	Disability reductions		45	245	238	223	256	146	55	20	18	1246
d	Net Chargeable Dwellings	45	8903	23484	17974	14082	12841	6303	2096	292	54	86074
f	Dwellings with 1 discount	26	5094	10156	6275	4179	3092	1161	275	40	2	30300
g	Dwellings with 2 discounts	2	18	57	55	45	45	34	22	28	11	317
h	Total Discounts @ 25%	30	5130	10270	6385	4269	3182	1229	319	96	24	30934
i	Total Discounted Dwellings	37.5	7620.5	20916.5	16377.75	13014.75	12045.5	5995.75	2016.25	268	48	78340.5
j	Ratio to Band D	5/9	6/9	7/9	8/9	1	11/9	13/9	15/9	18/9	21/9	
	Band D Equivalent	20.83	5080.33	16268.39	14558	13014.75	14722.28	8660.53	3360.42	536	112	76333.53
	TAX BASE AT 97.5% COLLECTION RATE											74425.19
	Adjustment for Class O Dwellings											0
												74425.19

**Key**

- a The number of dwellings shown in the Valuation List, less exempt dwellings
- b The estimated movement during the year arising from new properties and other movements in Valuation Bands due to appeals etc.
- c Dwellings which have a (particular) feature required for a disabled resident and therefore are charged at the next lower band
- d Dwellings subject to Council Tax in the specified Valuation Band
- f 25% discount applies where only one adult is counted as resident (certain residents are not counted e.g students & mentally impaired)
- g Vacant dwellings and dwellings where none of the residents are counted, attract 50% discount
- h The total number of discounts @25% i.e.: f + (gx2)
- i The total net chargeable dwellings (line d) less a deduction to reflect the discounts shown in line h
- j The adjustment ratio due to the variations in charge, e.g. Band B properties are charged at 7/9ths of Band D.

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**COUNCIL TAX BASE CALCULATION 2021-22**

**Table 1.b**

A	Band D Equivalent Dwellings	76333.53
B	Estimated Collection Rate	97.5%
	A x B	74,425.19
	Class O Exempt	0
	<b>COUNCIL TAX BASE 2021-22</b>	74,425.19

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Table 2 - community totals

**TABLE 2****Tax Base Community Totals 2021/22**

<b>COMMUNITY</b>	<b>TAX BASE</b>	<b>COMMUNITY</b>	<b>TAX BASE</b>
<b>(Col. 1)</b>	<b>2021/22</b>	<b>(Col. 1)</b>	<b>2021/22</b>
ABERGWILI	731.50	PENCARREG	556.62
ABERNANT	131.55	NEWCASTLE EMLYN	476.99
BRONWYDD	280.21	CARMARTHEN TOWN	5628.74
CILYMAENLLWYD	340.93		
CYNWYL ELFED	462.04	AMMANFORD	1964.48
EGLWYSCUMMIN	188.68	CWMAMAN	1593.14
GORSLAS	2049.68	LLANDEILO	806.14
HENLLANFALLTEG	226.04	LLANDOVERY	797.26
LAUGHARNE	566.05	BETWS	888.25
LLANARTHNE	408.08	CILYCWYM	228.76
LLANBOIDY	445.96	CYNWYL GAEO	444.58
LLANDDAROG	556.15	DYFFRYN CENNEN	525.29
LLANDDOWROR & LLANMILOE	344.45	LLANDDEUSANT	126.50
LLANDYFAELOG	639.78	LLANDYBIE	4395.03
LLANGAIN	285.59	LLANEGWAD	723.89
LLANGYNDEYRN	1537.85	LLANFAIR-AR-Y-BRYN	272.34
LLANGUNNOR	1155.05	LLANFIHANGEL ABERBYTHYCH	592.71
LLANGYNIN	131.75	LLANFYNYDD	228.85
LLANGYNOG	232.86	LLANGADOG	625.87
LLANLLAWDDOG	348.75	LLANGATHEN	267.44
LLANPUMSAINT	329.75	LLANSADWRN	227.77
LLANSTEFFAN & LLANYBRI	573.04	LLANSAWEL	203.04
LLANWINIO	205.00	LLANWRDA	234.34
MEIDRIM	272.86	MANORDEILO & SALEM	785.94
NEWCHURCH & MERTHYR	310.50	MYDDFAI	178.37
PENDINE	164.91	CWARTER BACH	969.90
ST CLEARNS	1345.00	TALLEY	248.05
ST ISHMAELS	765.06		
TRELECH A'R BETWS	326.92	LLANELLI TOWN	8940.31
WHITLAND	739.82	LLANELLI RURAL	8418.77
CENARTH	546.38	PEMBREY & BURRY PORT	3238.60
LLANFIHANGEL-AR-ARTH	922.28	KIDWELLY TOWN	1388.97
LLANFIHANGEL RHOS-Y-CORN	217.20	LLANEDI	2278.73
LLANGELER	1519.31	LLANGENNECH	1984.86
LLANLLWNI	323.02	LLANNON	1956.85
LLANYBYDDER	607.05	PONTYBEREM	1023.57
LLANYCRWYS	107.90	TRIMSARAN	865.29
	20338.95		54086.24
		<b>TOTAL</b>	74425.19

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