

# 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.**

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## 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

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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 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.

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## 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.**

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#### 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.**

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*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.

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*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.**

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*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.

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*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.**

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**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.**

**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.

*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.**



**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.

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*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.

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#### 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.**

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**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.**

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**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 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..

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*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.**

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### 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

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**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.

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**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.

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#### Council's Initial Response

**Support welcomed**

#### Action

**No change to the Plan.**

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### 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.

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#### 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 stiches 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.**

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*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.**

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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**

*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.**

## 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.**



*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.

*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**

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*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.**



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**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.**



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**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.**

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#### 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.**





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*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.

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*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.**

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*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 identificaton 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 amheuon 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.

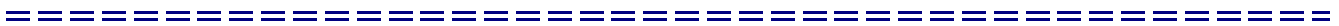
*Council's Initial Response*

**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)

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***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 Representatation 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.

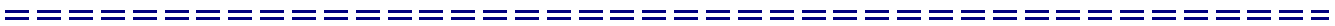
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*Council's Initial Response*

**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 on 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 Cychwynol). 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.

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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.**

**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.

*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.

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***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*

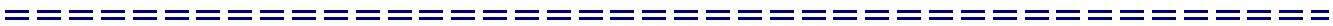
**Disagree.** The respondent has provided no detailed evidence to substantiate their assertion other than referencing the inclusion of sites within previous development plan.

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:*

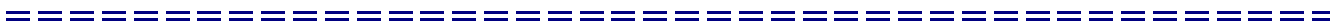
The site has been waiting for 45 years to be placed in the development Plan. Drainage/ sewage infrastructure in place for 45 years, also attractive views over Llanelli. Reference made to Council fields adjacent. Access via Dimpeth Lane not Pentrepoeth. Close to schools, hospital - no traffic jams or 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.**



*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.**

**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.

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**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**

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*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)**

|             |   |               |
|-------------|---|---------------|
| <b>4516</b> | <b>Lucy Tootle [5279]</b>   | <b>Object</b> |
|             | <i>Summary:</i><br>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.   |               |
| <b>4512</b> | <b>Mr Gareth Edwards [5276]</b>   | <b>Object</b> |
|             | <i>Summary:</i><br>We confirm our support to remove the scrapyard and replace it with an attractive, new housing development and a safeguarded ecology area.  |               |
| <b>3984</b> | <b>Mr Phil Mann [2574]</b>  | <b>Object</b> |
|             | <b>Agent: Mr Stuart Owen [731]</b>  |               |
|             | <i>Summary:</i><br>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.   |               |
| <b>4507</b> | <b>H Barrell [5269]</b>   | <b>Object</b> |
|             | <i>Summary:</i><br>Objection to the exclusion of site reference SR/067/004  |               |
| <b>4506</b> | <b>Bryan &amp; Lynette Winn [5268]</b>  | <b>Object</b> |
|             | <i>Summary:</i><br>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   |               |
| <b>3781</b> | <b>Cllr. A &amp; D Vaughan Owen &amp; Price [5057]</b>  | <b>Object</b> |
|             | <i>Summary:</i><br>Objection to the exclusion of candidate site ref SR/067/004 under policy HOM1.<br><br>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.<br><br>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. |               |
| <b>4505</b> | <b>Denise Dixon [5267]</b>  | <b>Object</b> |
|             | <i>Summary:</i><br>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.  |               |
| <b>4510</b> | <b>P N Newell [5272]</b>  | <b>Object</b> |
|             | <i>Summary:</i><br>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 Penybanc 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.**

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*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.

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**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.

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**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.

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**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.

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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 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.

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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 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

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*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 postive 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).

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*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:

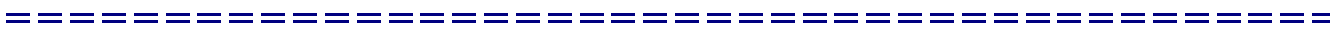
- \* This is an infill site.
- \* The site has access to Sewerage and Water, is served by adjacent street lighting, has three routes into the centre of the village to access key facilities, with wide pavements and public footpaths.
- \* The 30mph road alongside the site is wide, with excellent visibility.
- \* 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.

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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.**

*Action*

**No change to the Plan.**

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*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**

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*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.**

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*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.

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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.**

*Action*

**No change to the Plan.**

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*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:*

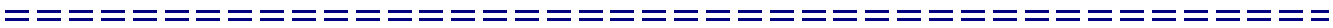
Objection to policy HOM1 seeking the allocation of part of the candidate site SR/031/008 within the Deposit Revised LDP.

*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.

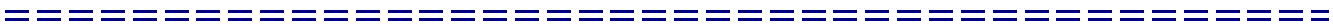
*Council's Initial Response*

**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.

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*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.**

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*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**

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*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.

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**Council's Initial Response**

**Support welcomed.**

**Action**

**No change to the Plan.**

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*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.

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*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.**





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**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:**

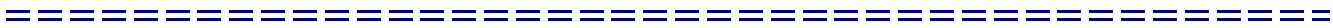
Concern is raised about the delivery of the West Carmarthen housing site (PrC1/MU1). Numbers in support of the current, and past delivery rate illustrate that the level of development anticipated will not be achieved.

**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:*

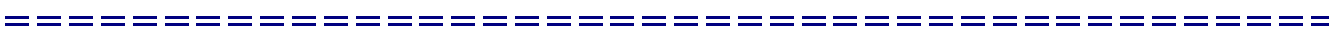
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny 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.

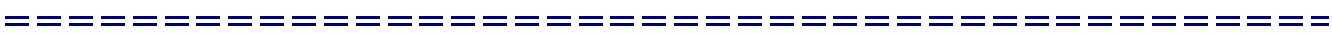
*Council's Initial Response*

**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.**



**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).



**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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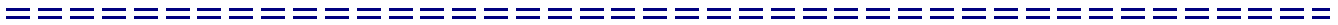
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however that there are a number of housing developments already under construction and / or completed within the settlement to date within the Plan period. Notable of which are PrC2/h3 (94 units), PrC2/h13 (29 units), Prc2/h18 (32 units), prc2/h19 (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).**





**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).



**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).**

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**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).**



**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).

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**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.



**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

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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.

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**

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.**

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**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**

**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.**

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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.**

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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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**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.**

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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.

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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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.**

**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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**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.

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**

**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 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***

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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 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 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**

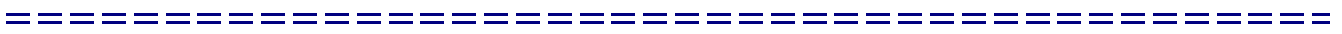
**Comments noted.**

**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.**

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*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 Llchwyr to 'Phase 1' of Aber Llchwyr has created a dangerous corner as traffic approaches 1 Aber Llchwyr 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.**



**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

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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 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.

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**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.

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**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.

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**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.

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*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**

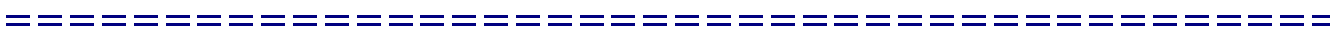
**The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared.**

**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**



**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   | <b>Mr &amp; Mrs P &amp; J Knight [3953]</b>                    | <b>Object</b> |
| <b>Agent: Evans Banks Planning Limited (Richard Banks) [4967]</b>  |  |               |
| <b>Summary:</b>  |  |               |
| <p>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.</p> |  |               |
| 4386   | <b>Lady Julie Romani [817]</b>                                 | <b>Object</b> |
| <b>Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]</b>   |  |               |
| <b>Summary:</b>  |  |               |
| <p>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.</p>   |  |               |
| 3308   | <b>Barratt David Wilson Homes (Mrs Francesca Evans) [4879]</b> | <b>Object</b> |
| <b>Summary:</b>  |  |               |
| <p>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.</p>  |  |               |
| 4411   | <b>Mr V Vijayasundaram [5091]</b>                              | <b>Object</b> |
| <b>Agent: Evans Banks Planning Limited (Richard Banks) [4967]</b>  |  |               |
| <b>Summary:</b>  |  |               |
| <p>Objection to the allocation of site PrC3/h4, seeking the site's removal from the Deposit Plan under policy HOM1.</p>  |  |               |
| <p>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.</p>  |  |               |



|   |  |               |
|---|--|---------------|
| 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><br><i>Agent: Aspinalls Planning &amp; Legal (David Lucas) [5125]</i><br><i>Summary:</i><br>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><br><i>Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]</i><br><i>Summary:</i><br>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><br><i>Agent: Evans Banks Planning Limited (Richard Banks) [4967]</i><br><i>Summary:</i><br>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><br><i>Summary:</i><br>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><br><i>Agent: Evans Banks Planning Limited (Richard Banks) [4967]</i><br><i>Summary:</i><br>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.
-



|   |   |               |
|---|---|---------------|
| 3965  | <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/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.  |   |               |
| 3971  | <b>Magnet Properties Limited ( _ _ _ ) [5107]</b>               | <b>Object</b> |
| <b>Agent: Evans Banks Planning Limited (Richard Banks) [4967]</b>   |   |               |
| <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   |   |               |
| 4561  | <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.   |   |               |
| 4050  | <b>Evans Banks Planning Limited (Mr Jason Evans) [2988]</b>     | <b>Object</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. |   |               |
| 4382  | <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/h9 Land adjacent to Maesyrfhaf.   |   |               |

|  |  |               |
|--|--|---------------|
| 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 Maesyrfhaf.   |  |               |

*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. |   |               |

|             |  |               |
|-------------|--|---------------|
| <b>4007</b> | <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/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.   |               |
| <b>4157</b> | <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. |               |
| <b>4390</b> | <b>Mr A Pritchard [5153]</b>   | <b>Object</b> |
|             | <b>Agent: Evans Banks Planning Limited (Mr Jason Evans) [2988]</b>   |               |
|             | <b>Summary:</b>  |               |
|             | Objection to the inclusion of PrC3/h10 in the Deposit Revised LDP under policy HOM1  |               |
| <b>3651</b> | <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/h10 Land to the rear of Gwernllwyn, Cross Hands  |               |
| <b>4041</b> | <b>Davies Richards Developments [5131]</b>   | <b>Object</b> |
|             | <b>Agent: Evans Banks Planning Limited (Richard Banks) [4967]</b>  |               |
|             | <b>Summary:</b>  |               |
|             | 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.   |               |

**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 Nantydderwen, 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.

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**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**



**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.

*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.**

**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><br>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><br>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><br>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><br>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 |
| <p><b>Summary:</b><br/>Objection to the inclusion of site PrC3/h22. Been allocated for a long period of time but not actively being brought forward</p>   |   |        |
| 4204  | Persimmon Homes West Wales (Stuart Phillips) [5154] | Object |
| <p><b>Agent:</b><br/><b>WYG PLANNING &amp; ENVIRONMENT (Louise Darch) [598]</b></p>   |   |        |
| <p><b>Summary:</b><br/>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.</p>              |   |        |
| 4322  | Persimmon Homes West Wales (Stuart Phillips) [5154] | Object |
| <p><b>Agent:</b><br/><b>WYG PLANNING &amp; ENVIRONMENT (Louise Darch) [598]</b></p>   |   |        |
| <p><b>Summary:</b><br/>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.</p> |   |        |
| 4062  | Mr Phil Mann [2574]                                 | Object |
| <p><b>Agent: Mr Stuart Owen [731]</b></p>   |   |        |
| <p><b>Summary:</b><br/>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.</p>   |   |        |

*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.



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**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.

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***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 Tirycoed road being an unsuitable road for access. Tirycoed 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 Tirycoed 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.

Tirycoed 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 Cwmaman 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:*

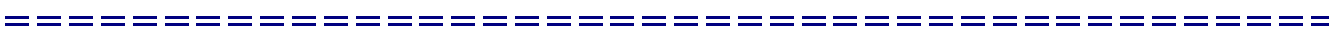
The Carmarthenshire Deposit LDP currently relies on a number of historic housing allocations that have unquestionably had deliverability issues to date given the failure come forward within the last plan period. It is considered that there is an inadequate evidence that an appropriate degree of scrutiny 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.**





**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.**

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## 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.

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*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**



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**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.

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*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.

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*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.**

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**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.

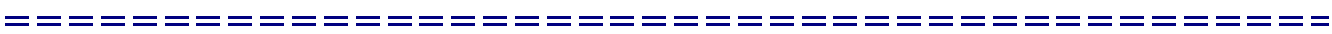
*Council's Initial Response*

**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**



**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.

***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).

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*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 AHAA's? 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

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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.

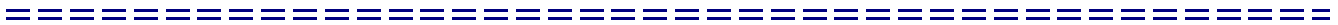
Its designation would not lead to additional environmental pressure, but instead could lead to the fostering of sustainable growth and allow for wider economic activity. Its development would be in keeping and in character with the local area and will ensure a deliverable source of future economic growth.

*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.**

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*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.**

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**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.**

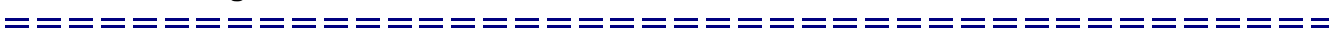
**Further evidence will be produced ahead of the submission of the Plan for Examination. This includes building upon the Welsh Language Impact Assessment (December 2019), undertaking further analysis work in terms of population and household projections/ migration data and also updating the Two County 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:  
&quot;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&quot;.

*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.

---

*Council's Initial Response*

**Support welcomed.**

*Action*

**No change to the Plan.**

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**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.**

---

**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".

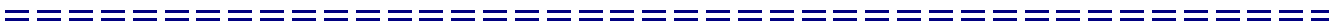
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*Council's Initial Response*

**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".

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### *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.**

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## 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.

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### *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.

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*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.**

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**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"

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*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.**

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**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.**



**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**

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## 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.**

=====



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## 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.

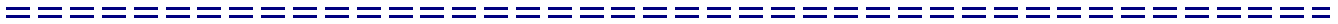
*Council's Initial Response*

**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.

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### *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.

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*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.

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*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.

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**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.**

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**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.**

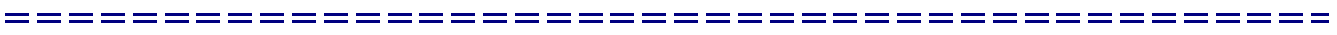
**New Supplementary Planning Guidance (SPG) will be prepared by the Council.**

**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)**

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**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 Llŵchwr:

Hoffwn gael esboniad i'r rhesymau pam mae ardal Cwm Llŵchwr bellach wedi colli ei statws CLG? Fel yn y CDLI CCC blaenorol, roedd Cwm Llŵchwr yn cael ei gategoreiddio fel tirwedd o bwys sylweddol (CLG) gyda'r angen i ddiogelu cymeriad cyffredinol CLG Cwm Llŵchwr, 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 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."

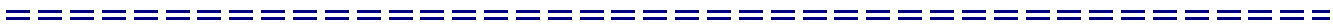
*Council's Initial Response*

**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".

---

### *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:*

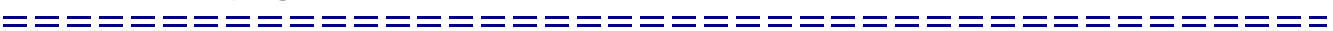
3. Non-Residential Buildings - Point i gives examples including short let holiday accommodation, static and touring caravan sites and camping sites. We seek clarification as to why these are not treated as residential as they would be classified as highly vulnerable under TAN 15.

*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 Pembrokehire 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 Pembrokehire 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.**

=====

**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.**

=====

**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.

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### *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).**

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## 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.

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### *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.

---

*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.

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### *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.

---

### *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 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 viewed under the Council's responses to comments received under policy SP16.

*Action*

**No change to the Plan.**



**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 bolisiâu 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.**

*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 supportedby 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:*

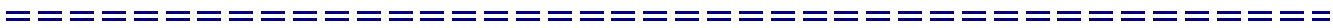
In support of HOM3 and SP16, candidate site SR/130/001 represents one such opportunity for new housing development and being well related to the existing form of the village, it would represent a logical round-off opportunity.

*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.

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**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.

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**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.**

## 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...'

---

**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."

---

### *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.**

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**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

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*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.**

