

Appendix 1

Draft Delivery Agreement – Consultation Responses

The following responses we've received during the consultation period held between the 5th February and 23rd March 2018 in respect of the Draft Delivery Agreement for the Revised Carmarthenshire Local Development Plan 2018 – 2033. Where appropriate each representation is accompanied by the comments received (summarised where appropriate) along with officer comments and recommendations.

Representation No: **DA/001**

Name: **W Thomas**

Organisation (where applicable): **N/A**

Question 1a – Do you consider the content and purpose of the DA to be Clear and Understandable?: **YES**

Question 1b – Does the draft DA make clear the appropriate steps/stages in respect of LDP preparation?: **YES**

Question 2a – Do you consider the proposed Timetable for the preparation of the LDP to be realistic and deliverable?: **YES**

Comment: **Mae'r amserlen yn dynn o gofio bod angen trafod gyda nifer sylweddol o randdeiliaid.**

The timetable is tight given that there is a need to discuss with a significant number of stakeholders.

Question 3a – Does the CIS make it clear how and when you or your organisation can get involved?: **YES**

Question 3b – Do you consider that the methods of involvement identified within the CIS are appropriate?: **YES**

Question 3c – Do you consider that the appropriate key stakeholders have been identified to achieve a representative Plan?: **YES**

Question 3d – Do you consider that the appropriate Consultation Bodies and multi-agency partnerships have been identified?: **YES**

Question 4 - Additional Comments/suggestions:
None

Officer Response

Wedi nodi. Er ei bod wedi nodi bod proses paratoi'r Cynllun Datblygu Lleol (CDLI) a'i amserlen ar gyfer ei pharatoi yn cynnwys nifer o gyfnodau allweddol gan gynnwys y rheiny pan fydd ymgysylltiad yn arbennig o bwysig. Mae'r amserlen gyfan ar gyfer paratoi'r CDLI Diwygiedig wedi ei seilio ar gyngor wrth Lywodraeth Cymru a'r cyfnodau sydd wedi eu gosod yn y rheoliadau statudol. Dylid nodi bod yr amserlen yn cynnwys elfennau sydd wedi ei gosod yn gadarn, yn enwedig o gwmpas yr Archwiliad Cyhoeddus pan mae ychydig o ddisgresiwn gyda'r awdurdod i wneud addasiadau pellach.

Noted. Whilst it is noted that the LDP's preparatory process and its timetable for preparation includes a number of key stages including those where engagement is of particular importance. The overall timescale for its preparation of the Revised LDP is based upon Welsh Government advice and the stages set out within the statutory regulations. It should also be noted that the timetable includes fixed timetabling elements, notably around the Examination in Public where there is limited discretion for the authority to make further adjustments.

Recommendation

Dim newid i'r Cytundeb Cyflenwi. Modd bynnag, dylid cyfeirio at y 'newidiadau arfaethedig y swyddogion' sydd wedi eu gosod yn yr adroddiad yma. Gweler Atodiad 2.

No change to the Delivery Agreement. Reference should however be had to the 'Officer Proposed Changes' as set out within this report. See Appendix 2.

Representation No: **DA/002**

Name: **F Jones**

Organisation (where applicable): **West Wales Rivers Trust**

Question 1a – Do you consider the content and purpose of the DA to be Clear and Understandable?: **YES**

Question 1b – Does the draft DA make clear the appropriate steps/stages in respect of LDP preparation?: **YES**

Question 2a – Do you consider the proposed Timetable for the preparation of the LDP to be realistic and deliverable?: **YES**

Question 3a – Does the CIS make it clear how and when you or your organisation can get involved?: **NO**

Comment: **The West Wales Rivers Trust is not listed within the list of consultation bodies.**

Question 3b – Do you consider that the methods of involvement identified within the CIS are appropriate?: **YES**

Question 3c – Do you consider that the appropriate key stakeholders have been identified to achieve a representative Plan?: **NO**

Comment: **Environmental Non-Government Organisations should be represented on the stakeholder group - Wales Environment Link can nominate a person.**

Question 3d – Do you consider that the appropriate Consultation Bodies and multi-agency partnerships have been identified?: **NO**

Comment: **The West Wales Rivers Trust should be included in the list of consultation bodies.**

Question 4 - Additional Comments/suggestions:
None

Officer Response

Noted. The preparatory process associated with the Revised LDP and the Delivery Agreement is recognised with the value of the Environment and central in the preparation of the Revised LDP and its policies and proposals.

Whilst it is agreed to add The West Wales Rivers Trust to the list of consultation bodies. It is not considered necessary to further add to the membership of the Key Stakeholder Forum as sufficient representation is currently included to facilitate a discussion across a range of groups.

Recommendation

Amend the Delivery Agreement by adding The West Wales Rivers Trust to the list of consultation bodies.

Representation No: **DA/003**

Name: **C Peters-Bond**

Organisation (where applicable): **N/A**

Question 1a – Do you consider the content and purpose of the DA to be Clear and Understandable?: **No**

Comment: **If the document is aimed at members of the public, then the plan is dense, full of jargon and relatively impenetrable.**

Question 1b – Does the draft DA make clear the appropriate steps/stages in respect of LDP preparation?: **YES**

Comment: **If you can get through the language used to describe it.**

Question 2a – Do you consider the proposed Timetable for the preparation of the LDP to be realistic and deliverable?: **YES**

Question 3a – Does the CIS make it clear how and when you or your organisation can get involved?: **YES**

Question 3b – Do you consider that the methods of involvement identified within the CIS are appropriate?: **YES**

Question 3c – Do you consider that the appropriate key stakeholders have been identified to achieve a representative Plan?: **YES**

Question 3d – Do you consider that the appropriate Consultation Bodies and multi-agency partnerships have been identified?: **YES**

Question 4 - Additional Comments/suggestions:

The respondent states that the lack of a coordinated development plan with adjoining Councils is a mistake. While a long list of potential consultees have been listed, it's not clear how their views will effectively influence the plan which appears quite inward looking.

Officer Response

Noted. Whilst it is recognised that some aspects around the content of the Delivery Agreement may not be entirely Plain English its content in places reflects the often technical nature of its content. The Council will however be preparing an 'easy read' publication to support the use of the Revised LDP.

The value attached to working with neighbouring Council's is reflected in the Welsh Governments Tests of Soundness against which the appropriateness of the Revised LDP will be measured and assessed. In this respect the neighbouring authorities within the region have a long standing and close relationship with collaboration and information sharing an important part. This remains and each neighbouring authority are a specific consultee in plan making and have representatives on the Key Stakeholder Forum. Reference is made to section 1.8 of the Draft Delivery Agreement.

Recommendation

No change to the Delivery Agreement.

Representation No: **DA/004**

Name: **J Rollinson**

Organisation (where applicable): **J4mRoll Solutions**

Question 1a – Do you consider the content and purpose of the DA to be Clear and Understandable?: **YES**

Question 1b – Does the draft DA make clear the appropriate steps/stages in respect of LDP preparation?: **YES**

Question 2a – Do you consider the proposed Timetable for the preparation of the LDP to be realistic and deliverable?: **YES**

Question 3a – Does the CIS make it clear how and when you or your organisation can get involved?: **YES**

Question 3b – Do you consider that the methods of involvement identified within the CIS are appropriate?: **YES**

Question 3c – Do you consider that the appropriate key stakeholders have been identified to achieve a representative Plan?: **YES**

Question 3d – Do you consider that the appropriate Consultation Bodies and multi-agency partnerships have been identified?: **YES**

Question 4 - Additional Comments/suggestions:
None

Officer Response
Noted

Recommendation
No change to the Delivery Agreement.

Representation No: **DA/005**

Name: **M. Lindsley**

Organisation (where applicable): **The Coal Authority**

Question 1a – Do you consider the content and purpose of the DA to be Clear and Understandable?: **N/A**

Question 1b – Does the draft DA make clear the appropriate steps/stages in respect of LDP preparation?: **N/A**

Question 2a – Do you consider the proposed Timetable for the preparation of the LDP to be realistic and deliverable?: **N/A**

Question 3a – Does the CIS make it clear how and when you or your organisation can get involved?: **N/A**

Question 3b – Do you consider that the methods of involvement identified within the CIS are appropriate?: **N/A**

Question 3c – Do you consider that the appropriate key stakeholders have been identified to achieve a representative Plan?: **N/A**

Question 3d – Do you consider that the appropriate Consultation Bodies and multi-agency partnerships have been identified?: **N/A**

Question 4 - Additional Comments/suggestions:

Note comments submitted in light of the Review Report. Having had an opportunity to review the Review Report and note that no fundamental changes are proposed to the mineral or unstable land policies, although these policies will respond to any contextual, evidential or factual changes arising. On this basis we have no specific comments to make at this time.

Officer Response

It is noted that the comments received predominately relate to the content of the Review Report. The respondent remains a consultee in the preparation of the Revised LDP.

Recommendation

No change to the Delivery Agreement.

Representation No: **DA/006**

Name: **G Ayres**

Organisation (where applicable): **Carmarthenshire County Council**

Question 1a – Do you consider the content and purpose of the DA to be Clear and Understandable?: **N/A**

Question 1b – Does the draft DA make clear the appropriate steps/stages in respect of LDP preparation?: **N/A**

Question 2a – Do you consider the proposed Timetable for the preparation of the LDP to be realistic and deliverable?: **N/A**

Question 3a – Does the CIS make it clear how and when you or your organisation can get involved?: **N/A**

Question 3b – Do you consider that the methods of involvement identified within the CIS are appropriate?: **N/A**

Question 3c – Do you consider that the appropriate key stakeholders have been identified to achieve a representative Plan?: **N/A**

Question 3d – Do you consider that the appropriate Consultation Bodies and multi-agency partnerships have been identified?: **N/A**

Question 4 - Additional Comments/suggestions:

Page 4, paragraph 1.4.1 - There is reference here to ‘the Council’s Well-being Plan’. The respondent wishes to confirm that the Well-being Plan is the responsibility of the PSB and not the Council. Could this be amended?

Page 4, Soundness tests questions – Whilst appreciating that these questions are probably set at a national level the respondent points out that the questions relating to Single Integrated Plan (SIP) will not be relevant after May 2018 as all Counties will have replaced their SIPs with well-being plans from May 2018 onwards.

Page 13, paragraph 3.3.3 - Key Stakeholder Forum - There is reference to ‘existing Community Strategy Partnership’. This require clarification.

Page 16, paragraph 3.4.3 - Seldom Heard Groups – Highlights the opportunity to access some such groups through other Council resources.

Page 17, paragraph 3.4.6 - Town and Community Councils – Reference is made to the existing network (forum) and the current 7 town and community councils subject to the Act. Highlights that this is a forum with the Clerks and Development Officers from those councils and not directly with the Community Councillors. Suggests that there is an opportunity to utilise such a forum. Makes reference to the requirement for these Councils from 2019 onwards to prepare an annual report to the PSB on how they’re working to achieve the objectives of the well-being plan.

Page 46, Appendix 7 – Key Stakeholder Forum - Amend ‘Carmarthenshire Local Health Board’ to ‘Hywel Dda University Health Board’.

Notes Dyfed Powys Police are named twice. The Police and Crime Commissioner is now responsible for all Police estates.

Officer Response

Noted. The respondent's points in relation to the tests of soundness are noted however, these reflect that material issued by the Welsh Government. The Revised LDP will however have full regard to the Well-being Plan once it supersedes the SIPs.

Welcomes the respondent's comments in respect of assisting in accessing a number of groups and forums is welcomed. Reference is made to paragraph 3.4.9 in respect of engaging with Town and Community Councils, including the forum identified.

The inclusion of Dyfed Powys Police and the Police and Crime Commissioner is intended to reflect the diversity of responsibilities and the range of contribution they can make to the Revised LDP's preparations

Recommendation

Amend paragraph 3.3.3 to ensure it is up-to-date and reflective of current provisions.

Amend paragraph 1.4.1 to clarify that the Well-being Plan is the responsibility of the Public Service Board.

Amend Appendix 7 to change 'Carmarthenshire Local Health Board' to 'Hywel Dda University Health Board'

Representation No: **DA/007**

Name: **S Luke**

Organisation (where applicable): **Natural Resources Wales**

Question 1a – Do you consider the content and purpose of the DA to be Clear and Understandable?: **N/A**

Question 1b – Does the draft DA make clear the appropriate steps/stages in respect of LDP preparation?: **N/A**

Question 2a – Do you consider the proposed Timetable for the preparation of the LDP to be realistic and deliverable?: **N/A**

Question 3a – Does the CIS make it clear how and when you or your organisation can get involved?: **N/A**

Question 3b – Do you consider that the methods of involvement identified within the CIS are appropriate?: **N/A**

Question 3c – Do you consider that the appropriate key stakeholders have been identified to achieve a representative Plan?: **N/A**

Question 3d – Do you consider that the appropriate Consultation Bodies and multi-agency partnerships have been identified?: **N/A**

Question 4 - Additional Comments/suggestions:

The respondent agrees with the proposed 'proposed schedule of works' as set out within the draft DA.

The respondent has no further comments.

Officer Response

Noted and welcomed.

Recommendation

No change to the Delivery Agreement.

Representation No: **DA/008**

Name: **S Morris**

Organisation (where applicable): **Pembrokeshire County Council**

Question 1a – Do you consider the content and purpose of the DA to be Clear and Understandable?: **N/A**

Question 1b – Does the draft DA make clear the appropriate steps/stages in respect of LDP preparation?: **N/A**

Question 2a – Do you consider the proposed Timetable for the preparation of the LDP to be realistic and deliverable?: **N/A**

Question 3a – Does the CIS make it clear how and when you or your organisation can get involved?: **N/A**

Question 3b – Do you consider that the methods of involvement identified within the CIS are appropriate?: **N/A**

Question 3c – Do you consider that the appropriate key stakeholders have been identified to achieve a representative Plan?: **N/A**

Question 3d – Do you consider that the appropriate Consultation Bodies and multi-agency partnerships have been identified?: **N/A**

Question 4 - Additional Comments/suggestions:

The respondent notes that the proposals are for a replacement Plan which will run to 2033, which corresponds with that for the proposed Pembrokeshire replacement LDP. Comments that this is helpful, particularly in the context of the letter from Lesley Griffiths AM, which proposed a Joint LDP for Carmarthenshire, Pembrokeshire and Ceredigion. Although the three authorities are currently moving ahead with proposals for single-authority LDP reviews, it is wise for each to align its review procedures and co-ordinate evidence preparation wherever possible.

Paragraphs 1.8.2 and 1.8.3 set out Carmarthenshire's position on Joint Plans and on the desirability of collaborative / collective work with neighbour Local Planning Authorities, wherever opportunities allow. The respondent supports Carmarthenshire's views in this respect.

The respondent supports their inclusion as a member of the Key Stakeholder Forum and its listing as a Specific Consultation body for the LDP. The respondent highlights that it will be pleased to contribute throughout the process of preparing the LDP.

In referencing Table 2 the respondent notes that the timescale is set out as being September 2018 – June 2020. Should this read September 2019 – 2020?

Officer Response

Support Welcomed.

The comments in relation to collaboration and co-ordination of evidence is welcomed.

Recommendation

Amend table 2 of the Delivery Agreement as appropriate (reference should also be had to the proposed amendments set out within Appendix 2 of this report).

Representation No: **DA/009**

Name: **E W Evans**

Organisation (where applicable): **Llangennech Community Council**

Question 1a – Do you consider the content and purpose of the DA to be Clear and Understandable?: **N/A**

Question 1b – Does the draft DA make clear the appropriate steps/stages in respect of LDP preparation?: **N/A**

Question 2a – Do you consider the proposed Timetable for the preparation of the LDP to be realistic and deliverable?: **N/A**

Question 3a – Does the CIS make it clear how and when you or your organisation can get involved?: **N/A**

Question 3b – Do you consider that the methods of involvement identified within the CIS are appropriate?: **N/A**

Question 3c – Do you consider that the appropriate key stakeholders have been identified to achieve a representative Plan?: **N/A**

Question 3d – Do you consider that the appropriate Consultation Bodies and multi-agency partnerships have been identified?: **N/A**

Question 4 - Additional Comments/suggestions:

The respondent makes a general comment in respect of the Revised LDP highlighting that they have resolved to oppose any further development in Llangennech. Further comments/observations will be made during stages of the preparation of the Revised LDP.

Officer Response

Noted

Recommendation

No change to the Delivery Agreement.

Representation No: **DA/010**

Name: **Not identified**

Organisation (where applicable): **Not identified**

Question 1a – Do you consider the content and purpose of the DA to be Clear and Understandable?: **YES**

Question 1b – Does the draft DA make clear the appropriate steps/stages in respect of LDP preparation?: **N/A**

Question 2a – Do you consider the proposed Timetable for the preparation of the LDP to be realistic and deliverable?: **N/A**

Question 3a – Does the CIS make it clear how and when you or your organisation can get involved?: **N/A**

Question 3b – Do you consider that the methods of involvement identified within the CIS are appropriate?: **N/A**

Question 3c – Do you consider that the appropriate key stakeholders have been identified to achieve a representative Plan?: **N/A**

Question 3d – Do you consider that the appropriate Consultation Bodies and multi-agency partnerships have been identified?: **N/A**

Question 4 - Additional Comments/suggestions:
None

Officer Response
Noted

Recommendation
No change to the Delivery Agreement.