

Appendix 1 – Key issues and Themes

Housing supply and the housing growth requirement

A number of representations were received objecting to the proposed level of growth outlined within the Revised LDP, and seeking a higher level of growth similar to that outlined within the current LDP. Many of these representations were a precursor to support the inclusion of non-allocated land within the plan.

Conversely, representations were also received which sought to reduce the levels of growth set out within the plan. These representations stated that a more realistic target should follow the Welsh Government's projections. This would reduce the levels of migration which dilute the Welsh language and unique culture of the county's settlements, and reduce the stresses faced within the health and social care system.

The level of growth set out within the Revised LDP seeks to balance the needs of both rural and urban communities, reflecting an ambitious yet realistic annual build rate, looks to deliver the Council's Corporate Strategy, regeneration and job creation objectives.

Further work will be undertaken in relation to the housing growth requirement and housing supply, with further population and household demographic evidence informing and supporting the Council's approach at the examination.

Housing Distribution

Representation was received relating to the distribution of housing growth and the use of 'Clusters' as part of the settlement hierarchy. Whilst no fundamental objections were received, the responses sought to acknowledge the need to direct the majority of development to sustainable locations within the county. Responses to the Plan include queries relating to the role and growth of rural settlements within the strategy.

The Council will in responding to the representations received undertake further work relating to Tier 4 of the settlement hierarchy and evidence the significant role these villages play in supporting the social, economic and linguistic fabric of their communities.

In addition, the housing trajectory and the associated evidence base will continue to highlight the location and rate of housing delivery within the county.

Retail

As part of the response to Covid-19 and in recognition of the changing shape of our Town centres and the Retail sector, the Focused Changes will seek to reflect the challenges ahead. In this respect consideration will be given to the future role of town centres and the nature of suitable activities in promoting vibrant and attractive living environments.

Affordable Housing

Whilst a limited number of responses were received relating to the Affordable Housing policies, the Council recognises its importance in meeting its strategic aims of maximising the development of affordable housing.

Further evidential work will be undertaken on planning contributions. In addition, the use of the Regional Development Viability Model will ascertain the level of affordable housing

contributions from large scale housing development, and safeguarded through the use of Statements of Common Ground with developers and landowners

Gypsy and Travellers

The Council recognises its requirement to provide an up to date Gypsy and Traveller accommodation needs assessment study for the plan period which was undertaken prior to the Deposit Consultation. This needs to be ratified by WG prior to the examination of the Plan. The draft needs assessment is currently with the WG for ratification.

The Deposit LDP has recognised the allocation of a new Gypsy and Traveller site within Llanelli to meet the housing need, in addition to the allocation of the extension to the Penybryn Traveller site in Bynea.

Site Specific Representations

A number of representations have been received relating to the allocation of housing sites within the Plan. Whilst a few of the representations are in support of the sites included in the Plan, the majority are objections to their inclusion within the Plan, in particular to the non-delivery of current allocated sites.

The Council will undertake further work where necessary to support the inclusion of the allocated sites, including the use of statements of common ground with developers on the larger allocated sites to re-affirm their inclusion, whilst on-going discussions are being undertaken with developers regarding the delivery mechanisms on smaller sites.

In relation to the candidate sites or requests to amend the development limits, circa 1,000 responses were received with the majority of them being submitted previously under the candidate site process in 2018. Their assessment would have already been undertaken and published in the January 2020 Site Assessment Table. New candidate sites will be considered within the process set out in the Site Assessment Methodology (September 2019).

Welsh language

Many of the comments received with regards the Welsh language form part of those wider considerations in regards the level and spatial distribution of growth as set out within the Plan, along with the strategic direction of travel.

There have also been a range of views expressed in terms of the Council's proposed policy approach, particularly in terms of the Revised LDP considering that Carmarthenshire in its entirety is considered to be an area of linguistic sensitivity.

It should be noted that in responding to such matters the Council has already prepared evidence, notably in the form of a Welsh Language Impact Assessment (December 2019). However, further evidence will be prepared moving forward. This includes building upon the Welsh Language Impact Assessment, undertaking further analysis work in terms of population and household projections/ migration data and also updating the Two County Economic Study for Carmarthenshire and Pembrokeshire (October 2019). This update to the Economic Study will further consider the links between the Welsh language and the economy in the two Counties.

Caeau Mynydd Mawr and the Burry Inlet

There have been no fundamental concerns raised in regard to these matters. They are fundamentally important policy areas as they seek to balance environmental, infrastructural and developmental interests at two strategically important locations within the County - namely the Cross Hands area and the Llanelli/Burry Port area.

The policies are Policy NE4 'Development within the Caeau Mynydd Mawr SPG Area' and Policy INF4 'Llanelli Wastewater Treatment Surface Water Disposal' respectively.

The Council will be aware that consultation has already been undertaken in regards Draft Supplementary Planning Guidance (SPG) prepared to support the implementation of the above policies. In this regard, the Council will be provided with responses received to the SPG consultation and recommendations in relation thereto. Again, there are no fundamental concerns raised.

Renewable Energy

Response for the Welsh Government in relation to Renewable Energy policies within the Revised LDP and the implications arising from the emerging Future Wales: the National Plan 2040 (formerly the National Development Framework) has required further evidencing to be undertaken. Amendments to the policies of the Revised Plan will be reflective of the changing positions within national policy.

Climate Change

Whilst not the subject of a significant level of representation the Revised LDP will continue to reflect the declaration both nationally and locally of the climate emergency and will further consolidate links to the Council's Net Zero Carbon agenda.

The Environment

In regards environmental matters, it is not considered that there are any fundamental issues. The Council has undertaken engagement with key consultees – notably Natural Resources Wales and Dwr Cymru Welsh Water. There are no fundamental concerns raised by these key consultees in regards the strategic direction of the Plan, however site-specific matters will be responded to as and where appropriate within the Schedule of Focused Changes.

It should however be noted that there is likely to be a requirement to respond to comments made in regards intensive agriculture.

Flood Risk

The Council has prepared evidence with regards this matter, with a Stage 1 SFCA and a Stage 1b SFCA undertaken and published. The Council will continue to seek to respond proactively to comments received at deposit Plan stage by way of focused changes – (notably comments received to policy CCH4 and paragraph 11.469 of the deposit Plan). However, and with reference again to proactive consultation undertaken (including with Natural Resources Wales), there are no fundamental concerns with regards to the Plan in this regard.

Infrastructure

There are no fundamental issues in respect of infrastructure and the Revised LDP. Of the representations received no raise serious issues of concern. However, there are some minor concerns with some areas from a highway's perspective. The council will look to acquire further evidence in regard to Cross Hands and the highways infrastructure needed to facilitate any new development in the area as the Plan progresses towards adoption. Particular reference will be had to any requirement to upgrade the 'diamond' on the East side of Cross Hands along with the Cross Hands Economic Link Road (ELR). This will alleviate any pressure caused by new developments at the new Cross Hands East Employment site. Welsh Government have no objections to make, only noting potential cumulative impacts in Cross Hands from a highways point of view.

Employment

Evidencing the deliverability of employment allocations is a key issue that the Welsh Government are continuing to emphasise, in accordance with PPW10. This has seen a streamlining of our employment allocations for the Revised LDP – a reduction from 113ha in the adopted LDP to just under 78ha in the Revised Plan.

However, whilst the overall employment portfolio has reduced in terms of specific allocations, new policy provisions have been introduced that seek to enable new employment opportunities in both our larger growth areas (e.g. reserve sites policy), as well as in the more rural areas where greater diversification will be possible.

Two further areas of importance emphasised by the Welsh Government in their representations concern the linking of housing growth with employment opportunities, and the need to engage with neighbouring authorities in the production of 'larger than local' employment studies. For both these topics we commissioned a joint study with Pembrokeshire County Council (and the two constituent National Park authorities with our borders). The resultant piece of work was completed at the end of 2019, and the consultants are currently providing follow up work, where they are looking at the effects of Brexit and Covid on the economy at the two county level and providing advice and positive ways forward.

Due regard is also given to the evidence base of the Plan, where annual monitoring reports (AMRs) and annual employment land reviews (ELRs) are maintained to ensure that the evidence is kept up to date.

Minerals

There were around 40 representations relating to minerals, most of these related to minor matters such as small-scale changes to policy wording.

There was however one objection from the Welsh Government relating to what they saw as the lack of evidence provided in the plan to ensure that there was a sufficient supply of sand and gravel reserves in the County (and Ceredigion and Pembrokeshire – as sand & gravel reserves is a cross border issue) to last until the end of the Plan period in 2033.

In response to this objection, Carmarthenshire CC has already commenced discussions with the two other authorities, with a view to progressing with the matter and drawing up a Statement of Sub Regional Collaboration (SSRC), as required in the Regional Technical Statement (RTS) for the South Wales Region (and as highlighted by the Welsh Government in their representation).

Due regard is also given to the evidence base of the Plan, where annual monitoring reports (AMRs) are maintained to ensure that the evidence is kept up to date. Furthermore, the Minerals Topic Paper (published at the end of 2019) will be revised and updated prior to submission of the Plan to the Welsh Government in May 2021.

Waste

There were very few representations on this topic area, with no objections from the Welsh Government.

One notable representation (submitted by consultants working for CWM Environmental Ltd) related to the allocation of Nantycaws as a waste management site (as it is in the current LDP). The Revised Deposit Plan had identified Nantycaws as a reserve site (under the reserve sites policy). In light of the strategic location of the site, consideration will be given to the allocation of Nantycaws as a regeneration and mixed-use site (under Policy SG1) as part of the focused changes (subject to County Council endorsement).

Due regard is also given to the evidence base of the Plan, where annual monitoring reports (AMRs) are maintained to ensure that the evidence is kept up to date. Furthermore, the Waste Topic Paper (published at the end of 2019) will be revised and updated prior to submission of the Plan to the Welsh Government in May 2021.

It should also be noted that Carmarthenshire is the Lead authority in the production of the annual 'Waste Planning Monitoring Report (WPMR) for the South West Wales region' – a key piece of evidence to be utilised by all six authorities in the sub region. The latest WPMR was submitted to the Welsh Government at the end of March 2020.