

Archaeology and Development

Reference No. SP0066

Respondent No. 0230

Mr Mike Ings

General Comments

Dyfed Archaeological Trust

Summary of Response:

The Development Management department of DAT has to be clearly differentiated from the commercial side. DAT DM is cited in paragraph 4.5 but an explanation would help clarify our position.

Response:

Agreed.

Recommendation:

The SPG to be amended accordingly.

Reference No. SP0067

Respondent No. 0230

Mr Mike Ings

Dyfed Archaeological Trust

Summary of Response:

General

References to DAT in the following paragraphs should be changed to DAT DM - paras. 4.13 (DAT HM), 4.18, 4.23, 4.27, 4.28, 4.32, 4.33, 5.6, 5.15, 5.18, 5.19, A1.2, A1.4 (DM not HM), A1.9 (2nd reference), A1.12, A1.21 and A1.22. Include an explanation that further info can be sought from DAT Heritage Management (DAT HM) in para.4.10 and add HM to DAT in para. 4.12.

Response:

Agreed.

Recommendation:

The SPG to be amended accordingly.

Reference No. SP0068

Respondent No. 0230

Mr Mike Ings

General Comments

Dyfed Archaeological Trust

Summary of Response:

Para's 5.4, A1.1 and A2.21

The SPG should be amended to rectify those instances where reference to the Chartered element of IfA has been omitted.

Response:

Agreed.

Recommendation:

The SPG to be amended accordingly.

Reference No. SP0069

Respondent No. 0230

Mr Mike Ings

General Comments

Dyfed Archaeological Trust

Summary of Response:

Para 5.7

In the paragraph on Human Remains (5.7) Annexe S3 of English Heritage's Guidance for Best Practice for Treatment of Human Remains Excavated from Christian Burial Grounds in England: 2005 needs to be changed to CfIa papers Excavation and post-excavation treatment of cremated and inhumed human remains (McKinley & Roberts 1993) and Guidelines to the Standards for Recording Human Remains (Brickley & McKinley 2004).

Response:

Agreed.

Recommendation:

The SPG to be amended accordingly.

Reference No. SP0070**Respondent No. 0230**

Mr Mike Ings

Dyfed Archaeological Trust

General Comments**Summary of Response:**

I note that the SPG uses a graphic of Pentre Ifan throughout – obviously an iconic Pembrokeshire monument – a Carmarthenshire example might be more appropriate, Carreg Cennen possibly?

Response:

Noted.

Recommendation:

An appropriate alternative will be considered.

Reference No. SP0071**Respondent No. 0230**

Mr Mike Ings

Dyfed Archaeological Trust

General Comments**Summary of Response:**

Typographical error missing 'of' before 'Western Roman'.

Response:

Agreed.

Recommendation:

The SPG to be amended accordingly.

Reference No. SP0072**Respondent No. 0006**

Mr David Watkins

Natural Resources Wales

General Comments**Summary of Response:**

General

The SPG also covers Gardens & Designed Landscapes, including Registered Parks & Gardens and Registered Historic Landscapes. This is not obvious from the title, therefore would respectfully recommend a re-title of the document.

Response:

Noted.

Recommendation:

An appropriate amendment out the title will be considered.

Reference No. SP0073**Respondent No. 0006**

Mr David Watkins

Natural Resources Wales

General Comments**Summary of Response:**

The Historic Environment Bill which was given Royal Assent 21 March 2016, circulars, PPW & guidance will have to be updated, which will affect this SPG.

Response:

Agreed.

Recommendation:

The SPG will be amended to reflect the existence of the Historic Environment Act. Future iterations of the SPG will be required to take account of changes in emanating from the act.

Reference No. SP0074**Respondent No. 0006**

Mr David Watkins

General Comments

Natural Resources Wales

Summary of Response:

Para. 2.1.
The Tywi Valley is included in the national Register of landscapes of Historic Interest in Wales, Part 2.1 Landscapes of Outstanding Historic Interest (there is only 1 Register). The SPG should refer to the fact that there are a number of landscapes on the Register within Carmarthenshire, including the Tywi Valley.

Response:

Noted.

Recommendation:

The SPG to be amended as appropriate.

Reference No. SP0075**Respondent No. 0006**

Mr David Watkins

General Comments

Natural Resources Wales

Summary of Response:

The paragraph should be amended to consider the Historic Environment Bill changes.

Response:

Noted.

Recommendation:

The SPG to be amended as appropriate to reflect the provisions of the act.

Reference No. SP0076**Respondent No. 0006**

Mr David Watkins

General Comments

Natural Resources Wales

Summary of Response:

Should refer to the Revised (2nd) Edition of the Guide to Good Practice and to ASIDOHLZ.

Response:

Agreed.

Recommendation:

The SPG to be amended accordingly.

Reference No. SP0108**Respondent No. 0006**

Mr David Watkins

General Comments

Natural Resources Wales

Summary of Response:

Para. 5.12.
The Tywi Valley, Taf & Tywi Estuary. Preseli, Dolaucothi & Black Mountain & Mynydd Myddfai are Landscapes of Outstanding Historic Interest, included in Part 2.1 of the Register. Drefach & Felindre and the Lower Teifi Valley are Landscapes of Special Historic Interest, included in Part 2.2 of the Register.

Response:

Noted.

Recommendation:

The SPG to be amended as appropriate.

Reference No. SP0109**Respondent No. 0006**

Mr David Watkins

Natural Resources Wales

General Comments**Summary of Response:**

Para. 5.14 & 5.15

Should refer to the Revised (2nd) Edition of the Guide to Good Practice and to ASIDOHLZ.

Response:

Agreed.

Recommendation:

The SPG to be amended accordingly.

Leisure & Open Space

Reference No. SP0077**Respondent No. 0006**

Mr David Watkins

Natural Resources Wales

General Comments**Summary of Response:**

Refer to Wellbeing of Future Generations Act and its set of principles.

Response:

Agreed.

Recommendation:

The SPG to be amended to appropriately reflect the Wellbeing and Future Generations Act.

Reference No. SP0078**Respondent No. 0006**

Mr David Watkins

Natural Resources Wales

General Comments**Summary of Response:**

Para. 2.2.9.

The respondent supports the context and proposals within this draft SPG. An important element is the integrating and merging of open spaces into ecological corridors allowing greater levels of connectivity for both humans and animals.

Response:

Support welcomed.

Recommendation:

Reference No. SP0079**Respondent No. 0006**

Mr David Watkins

Natural Resources Wales

General Comments**Summary of Response:**

Para. 2.2.11.

Have standards for natural greenspace and woodland (e.g. as adopted by Natural England & Woodland Trust) been included?

Response:

Noted. The LDP policy framework is based upon the Carmarthenshire Standard – see paragraphs 2.2.4 and 2.2.11 of the SPG.

Recommendation:
No change to the SPG.

Reference No. SP0080

Respondent No. 3227
Mr Morten Hanasand

General Comments

Summary of Response:

The respondent seeks the inclusion of a technical bicycle skills park. The respondent states their involvement in mountain biking as an enthusiast, but also advocates it as an asset for the local community. Mountain biking offers a fantastic opportunity to enjoy nature, improve fitness as well as providing a challenge to bike handling skills and excitement. Trail centres like Brechfa offer progression from beginner to expert in the form of green family trails through blue, red all the way to black expert trails. Some barriers to making use of this progression exist however. Having the time and facilities to get your mountain bike out to places like Brechfa is one. As a minimum, a vehicle, method of transporting the bike and the spare time to do this preparation as well as then enjoying the trip when one arrives is necessary. Going on a longer excursion like this into the trails is intensely rewarding, but has quite high requirements from the level of equipment, preparation and personal motivation. "Pump tracks" and bike skills parks, provide a bridge and initial introduction to mountain bike skills and an extremely accelerated skills curve. They can be placed close to population centres as they require less space, meaning they are within reach by using the bicycle itself as the means of transportation to get it to it. They also place lower demands on the initial investment in the bicycle and can be enjoyed on a fairly basic BMX bike or even a toddler's balance bike, all the way to an advanced full suspension mountain bike. The mountain bike community has a track record of providing an inclusive community which welcomes and encourages beginners and skills progression as well as providing challenge for every age group from toddlers to adventurous pensioners. I believe Carmarthen and the surrounding area has an opportunity to emulate the success of places like Boulder, Colorado in becoming an international hub of mountain bike professionals and organisations. I believe in large part their success can be attributed to local government's willingness to support bold initiatives like the Valmont Bike Park. Not only are they an excellent source of health, fitness and social interaction in the community, but they provide the breeding ground for tomorrow's mountain bike coaches, tourism providers, technical professionals, sports personalities, retail providers and even manufacturers like Howies. Wales has a track record of providing some of the best mountain biking trails in the world completely out of proportion to its area and population size. It can also boast of being the home to a large proportion of world champions in the various branches of the sport, examples being Gee Atherton, Manon Carpenter and the most successful mountain bike sports person in history, Rachel Atherton, as well as many others. To build on this success, to support up and coming ambassadors of the sport, and to provide the expertise of a growing and large industry, Carmarthenshire has an opportunity to become not just a road track cycling mecca, but building on excellent riding available at Brechfa, Cwm Rhaeadr and other venues. Carmarthenshire is already known for providing hidden gems of riding, guiding and training services and mountain bike holidays from the likes of Mudtrek, West Wales Trails and many other providers. Far from being competitors to these existing venues, a skills park would provide a feeding ground for these services as mountain bikers are notorious for seeking out new challenges and exploring. It is my opinion and wish that there should eventually be at least one pump track facility at every major population centre in the county and at least one definitive and comprehensive skills park as a focus for the county's mountain bike community. I think the county council could benefit from leveraging the opportunity that mountain biking as an activity for the population and the tourism it brings by even creating a full time position for facilitating it's growth and managing it within the county. The benefits that working towards in time bringing major event along the lines of "Crankworx" to the area cannot be overstated. The town of Rotorua in New Zealand, which now plays host to one round a year of Crankworx, has had so much growth from mountain biking that it now represents a third of local economy. With forward thinking leadership from local government I think Carmarthenshire can create a similar success story.

Response:

Noted. The merits of leisure related proposals (such as a technical bicycle skills park) are considered on their merits in accordance with the Plan's policy framework.

Recommendation:
No change to the SPG.

Reference No. SP0081

Respondent No. 3228
Ms Caryl Alban
CCC

General Comments

Summary of Response:

Add in reference to "play opportunities" add the end sentence reading – "Open spaces can also provide arenas for social interaction and community activities".

Response:
Agreed.

Recommendation:

Add the wording “play opportunities” at the end of this sentence.

Reference No. SP0082

Respondent No. 3228

Ms Caryl Alban

General Comments

CCC

Summary of Response:

Insert this text into the SPG – “Chapter 2, Section 11 of the Children and Families (Wales) measure sets out the Statutory Duty on Local Authorities across Wales as regards to Play Opportunities. Matter C of the Statutory Duty states that the Local Authority should recognise that all open spaces are accessible and are potentially important areas where children can play or pass through to reach other playable areas or places where they go”.

Response:

Agreed.

Recommendation:

Add a new sub heading after Paragraph 2.19 to read: “Chapter 2, Section 11 of the Children and Families (Wales) Measure” followed by a new paragraph (2.1.10) to read as follows: “The above sets out the Statutory Duty on Local Authorities across Wales as regards to Play Opportunities. Matter C of the Statutory Duty states that the Local Authority should recognise that all open spaces are accessible and are potentially important areas where children can play or pass through to reach other playable areas or places where they go.”

Reference No. SP0083

Respondent No. 3228

Ms Caryl Alban

General Comments

CCC

Summary of Response:

Carmarthenshire Play Sufficiency Assessment

Replace the current paragraph wording with - “As a result of the Statutory Duty placed on Local Authorities as regards to Play Opportunities Carmarthenshire County Council is required to assess and secure sufficient play opportunities, as well as publish up to date information regarding these play opportunities. Matter C of the Statutory Guidance focuses on assessing the space available for children to play within the community, this matter focuses on open spaces and outdoor unstaffed designated play spaces. Section 3 of this SPG reviews matters in relation to informal children’s play space.”

Response:

Agreed.

Recommendation:

Replace Para 2.2.14 with the wording “As a result of the Statutory Duty placed on Local Authorities as regards to Play Opportunities Carmarthenshire County Council is required to assess and secure sufficient play opportunities, as well as publish up to date information regarding these play opportunities. Matter C of the Statutory Guidance focuses on assessing the space available for children to play within the community, this matter focuses on open spaces and outdoor unstaffed designated play spaces. Section 3 of this SPG reviews matters in relation to informal children’s play space.”

Reference No. SP0084

Respondent No. 3228

Ms Caryl Alban

General Comments

CCC

Summary of Response:

Para 3.4.1

Re word the sentence – “The provision..... traffic has priority” - with the wording “Designated play spaces should provide attractive and challenging opportunities, particularly if children cannot play outside their homes due to barriers such as road traffic.”

Response:

Agreed.

Recommendation:

Replace this sentence with the wording: “Designated play spaces should provide attractive and challenging opportunities, particularly if children cannot play outside their homes due to barriers such as road traffic.”

Reference No. SP0085

Respondent No. 3228
Ms Caryl Alban
CCC

General Comments

Summary of Response:

Re word the sentence – “The Council..... opportunities for children” – with “The Local Authority fully supports the Statutory Duty placed on them regarding Play Sufficiency and Wales – A Play Friendly County provides statutory guidance on how Local Authorities should assess and secure sufficient play opportunities for children”.

Response:

Agreed.

Recommendation:

Replace this sentence with “The Local Authority fully supports the Statutory Duty placed on them regarding Play Sufficiency and Wales – A Play Friendly County provides statutory guidance on how Local Authorities should assess and secure sufficient play opportunities for children”.

Reference No. SP0086

Respondent No. 3228
Ms Caryl Alban
CCC

General Comments

Summary of Response:

What is ‘passive supervision’?

Response:

Noted. It refers to active surveillance within the context of good design principles.

Recommendation:

No change to the SPG.

Reference No. SP0087

Respondent No. 3228
Ms Caryl Alban
CCC

General Comments

Summary of Response:

4.2.3

Do we need to mention in more detail the importance of consultation? Matter H: Community Engagement of Play Sufficiency Assessment – “For play opportunities and community developments to meet the requirements of children it is essential that they are consulted with on what they want from play and recreational activities. The Local Authority should use participation and consultation methods that comply with the Welsh Government’s Children and Young People’s Participation Standards.”

Response:

Noted. It is considered that the procedural consultation undertaken as part of the planning application determination process is sufficiently robust.

Recommendation:

No change to the SPG.

Nature Conservation and Biodiversity

Reference No. SP0088

Respondent No. 0006
Mr David Watkins
Natural Resources Wales

General Comments

Summary of Response:

General comment
There is no pagination in this SPG.

Response:

Noted.

Recommendation:

Amend the SPG as appropriate.

Reference No. SP0089**Respondent No. 0006**

Mr David Watkins

Natural Resources Wales

General Comments**Summary of Response:**

Planning Policy Context - 3.1.

Should be Planning Policy Wales (PPW) Edition 8, January 2016.

Response:

Noted.

Recommendation:

The SPG will be amended to reflect the publication of the revised PPW.

Reference No. SP0090**Respondent No. 0006**

Mr David Watkins

Natural Resources Wales

General Comments**Summary of Response:**

Section 4 - Designated Sites and Habitats

In respect of SSSIs - they advise that the SPG is clear that where developments may affect a SSSI, full details of the likely impacts should be submitted with the planning application, together with relevant survey information and details of any mitigation measures that will be put in place as part of the development. It is only with this comprehensive information that the LPA will be able to fully consider the potential impact of proposals on SSSIs in accordance with their legislative duties in the Wildlife and Countryside Act (1981) (as amended).

Response:

Noted

Recommendation:**Reference No. SP0091****Respondent No. 0006**

Mr David Watkins

Natural Resources Wales

General Comments**Summary of Response:**

Para 5.3

Advocates that applicants liaise with the Local Authority ecologist to determine the ecological survey requirements for a planning application, and that as indicated by paragraphs 7.3-7.8, planning applications are submitted with all the relevant ecological survey information, along with a comprehensive impact assessment and details of all the mitigation and/or compensation measures that will be put in place.

Response:

Noted

Recommendation:**Reference No. SP0092****Respondent No. 0006**

Mr David Watkins

Natural Resources Wales

General Comments**Summary of Response:**

Note the content of the Paragraph and that an ecological survey calendar is provided in the SPG; we advise that Paragraph 7.10 is amended and an advisory note is attached to the survey calendar to confirm that surveys should follow published guidance, where this exists, as well as best practice. Published guidance is more specific about the timing of surveys (E.g. for bats) and reference to them can help avoid sub-optimal surveys being submitted and perhaps having to be repeated.

Response:

Agreed.

Recommendation:

The SPG to be amended accordingly to include an appropriate advisory note.

Reference No. SP0093

Respondent No. 0006

Mr David Watkins

Natural Resources Wales

General Comments

Summary of Response:

Section 11 Survey and Best Practice Guidelines

Note that the 3rd Edition of the Bat Conservation Trust's Bat Surveys: Good Practice Guidelines are now available and should be referred to.

Response:

Noted.

Recommendation:

The SPG to be amended as necessary to reflect its availability.

Placemaking and design

Reference No. SP0051

Respondent No. 0006

Mr David Watkins

Natural Resources Wales

General Comments

Summary of Response:

Needs link to the Wellbeing of Future Generations Act and the principles and to the health benefits of Green Infrastructure and well- designed spaces. .

Response:

Agreed.

Recommendation:

The SPG to be amended as appropriate developing on, and integrating the principles of the Wellbeing and Future Generations Act.

Reference No. SP0052

Respondent No. 0006

Mr David Watkins

Natural Resources Wales

General Comments

Summary of Response:

Para. 3.2.

Include reference to Marine Character Areas (Wales National Seascape Character Assessment).

Response:

Agreed.

Recommendation:

The SPG to be amended accordingly.

Reference No. SP0053

Respondent No. 0006

Mr David Watkins

Natural Resources Wales

Object

Summary of Response:

Para. 3.2.5. LANDMAP

Suggests the need to clarify that LANDMAP provides an assessment of the whole landscape of the County (and indeed Wales), not just the Special Landscape Areas. It would be useful to refer to the Register of Historic Landscapes somewhere in this section too.

Response:

Agreed.

Recommendation:

The SPG to be amended accordingly.

Reference No. SP0054

Respondent No. 0006

Mr David Watkins

General Comments

Natural Resources Wales

Summary of Response:

It would be useful to number the map to show the SLAs illustrated on p.7.

Response:

Agreed.

Recommendation:

The SPG to be amended accordingly.

Reference No. SP0055

Respondent No. 0006

Mr David Watkins

General Comments

Natural Resources Wales

Summary of Response:

Para. 3.2.7. 8- 3.2.8. - Green Infrastructure

Suggests the use of a recognised definition e.g. in NPPF, PPW, LI (Network of multi-functional green space...).

Response:

Noted.

Recommendation:

SPG to be amended where appropriate.

Reference No. SP0056

Respondent No. 0006

Mr David Watkins

General Comments

Natural Resources Wales

Summary of Response:

There is a need to emphasise that analysis should identify positive aspects of form & layout design to ensure positive additions, rather than replicating poor form & layout.

Response:

Agreed.

Recommendation:

The SPG to be amended accordingly.

Reference No. SP0057

Respondent No. 0006

Mr David Watkins

General Comments

Natural Resources Wales

Summary of Response:

Should take account of historic development patterns of settlements & their character in relation to landform e.g. are valley side/bottom settlements characteristic of Carmarthenshire rather than ridge-top.

Response:

Agreed.

Recommendation:

The SPG to be amended accordingly.

Reference No. SP0058

Respondent No. 0006

Mr David Watkins

General Comments

Natural Resources Wales

Summary of Response:

Para. 4.3. - Site Assets. (The benefits of Green Infrastructure).

We welcome and support this approach.

Response:

Support noted.

Recommendation:

Reference No. SP0059

Respondent No. 0006

Mr David Watkins

General Comments

Natural Resources Wales

Summary of Response:

Recommend that all public realm and green Infrastructure should have a Landscape & Ecological Management Plan to ensure the long term benefits of the landscape design are realised.

Response:

Disagree. Whilst the merits of such an approach are acknowledged it is not considered necessary for the SPG to be explicit in such matters. This may be best considered through potential further guidance on green infrastructural considerations.

Recommendation:

No change to the SPG.

Reference No. SP0060

Respondent No. 0006

Mr David Watkins

General Comments

Natural Resources Wales

Summary of Response:

The respondent supports this approach however within this section there appears no reference to the current Carmarthen Bay and Estuaries European Marine Site Memorandum of Understanding (CBEEMS MOU) to segregate foul and surface water flows and to provide compensatory surface water removal from the combined local Carmarthen Bay system. You will recall that this MOU is signed by Carmarthenshire County Council; City and County of Swansea Council; Dwr Cymru Welsh Water and Natural Resources Wales

Response:

Noted.

Recommendation:

The insertion of an appropriate cross reference to ensure awareness will be considered in the interests of clarity.

Reference No. SP0061

Respondent No. 0066

Mrs Liz Dutch

General Comments

Llansteffan Community Council

Summary of Response:

The respondent suggests rewording to reflect the following: Achieving good design ...requires an understanding of the relationship between all elements of the natural and built environment ... together with close partnership-working between all relevant sections of the County Council and local council and community.

Response:

Noted. Whilst the importance of the role of community councils is noted, such bodies are consulted at planning application stage. Furthermore, new legislation ensures that community councils are also consulted at pre-application stage. Consequently, including reference to community councils in this guidance document is not considered necessary.

Recommendation:

No change to the SPG.

Reference No. SP0062**Respondent No. 0066**

Mrs Liz Dutch

General Comments

Llansteffan Community Council

Summary of Response:

Special Landscape Areas (SLA) whilst a non-statutory designation, appear to be accorded very little weight by the Planning Committee in determining applications - such as the installation of a wind turbine in rural areas. The respondent cites an example of the Mwche Farm, Llanybri application to site a wind turbine opposite Dylan Thomas's Boathouse in the Taf Valley SLA.

Response:

Noted. Special Landscape Areas (SLA) are covered in Policy EQ6 Special Landscape Areas within the Adopted Carmarthenshire LDP. SLAs are therefore material considerations in the determination of planning applications.

Recommendation:

No further changes are considered necessary to the SPG.

Reference No. SP0063**Respondent No. 0066**

Mrs Liz Dutch

General Comments

Llansteffan Community Council

Summary of Response:

The respondent highlights the importance of cultural heritage appears to have been overlooked with no mention within the SLA or Character sections. To illustrate, Dylan Thomas's Boathouse represents cultural heritage of national importance – the respondent states that this was not taken into account in the determination of the Mwche wind turbine application.

Response:

Noted. Cultural Heritage is mentioned in paragraph 4.1.5 of the document.

Recommendation:

No further changes are considered necessary to the SPG.

Reference No. SP0064**Respondent No. 0066**

Mrs Liz Dutch

General Comments

Llansteffan Community Council

Summary of Response:

Para 4.3.1

The respondent suggests rewording to reflect the following: New development is often located on the edge of a settlement. Indeed the LDP allocates land in such locations to enable settlements to expand. However such new development must be proportionate in scale and character to the existing settlement, and not dominate or fundamentally alter its social, physical and visual characteristics.

Response:

Noted. The existing wording is considered appropriate and sufficient to cater for proposals at edge of settlement locations. The suggested changes are therefore not considered to be necessary.

Recommendation:

No change to the SPG.

Reference No. SP0065**Respondent No. 0066**

Mrs Liz Dutch

General Comments

Llansteffan Community Council

Summary of Response:

In relation to Working Together: Early Discussion with Planners/Local Community the respondent suggests rewording to reflect the following: The Planning Officer will also be in a position to advise on how to engage with key local stakeholders, to informally consult with the local council and community at pre-application stage and produce a proposal...application process.

Response:

The need for developers to consult with Town & Community Councils at the pre-application stage will be included in this paragraph to reflect The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016.

Recommendation:

No change to the SPG.

Reference No. SP0106

Respondent No. 0006

Mr David Watkins

General Comments

Natural Resources Wales

Summary of Response:

Needs link to the Wellbeing of Future Generations Act and the principles and to the health benefits of Green Infrastructure and well- designed spaces.

Response:

Agreed.

Recommendation:

The SPG to be amended as appropriate developing on, and integrating the principles of the Wellbeing and Future Generations Act.

Reference No. SP0107

Respondent No. 0006

Mr David Watkins

General Comments

Natural Resources Wales

Summary of Response:

Para. 3.2.7. 8- 3.2.8. - Green Infrastructure

Suggests the use of a recognised definition e.g. in NPPF, PPW, LI (Network of multi-functional green space...).

Response:

Noted.

Recommendation:

Rural Development

Reference No. SP0094

Respondent No. 1110

Miss Roxane Lawrence

General Comments**Summary of Response:**

The LDP does not allow enough land in the development envelope to meet local housing needs. Homes for Wales organisation campaign outside the assembly building because an extra 6000 homes are desperately needed in Wales. The LDP does not offer a choice of suitable sites. It excludes land at Myddynfych Farm Ammanford on enclosures 8700, 0851 and enc 0608. The last site 0608 backs onto the new playing field at Amman Valley comprehensive school. Development here would make use of existing infrastructure and allow children to walk to school easily by providing a gate into the school. Plots along the road frontage of enclosure 8700 have been included in the UDP and were erroneously removed from the new local plan because the council used old flood maps and Enclosure 0851 has three accesses into it from Gwaun Henllan and DoIY Derwen. These accesses have been retained and have cost many thousands of pounds to secure as developers are reluctant to honour contractual obligations. We wish to secure housing quotas of 400 dwellings for this land. The land is all readily developable and has all mains services. The council has ransom accesses here so they would make a large profit from these developments compared with other sites in the area.

Response:

Noted. This representation goes outside the remit of this SPG and the consultation. The matters highlighted by the respondent were subject to consideration during the preparation of the LDP and as applicable by the Independent Planning Inspector at the Examination in public.

Recommendation:

No change to the SPG.

Reference No. SP0095**Respondent No. 0006**

Mr David Watkins

Natural Resources Wales

General Comments**Summary of Response:**

Refers to the retention of existing hedgerows within schemes - we support this recommendation in terms of visual amenity and to assist in the retention of local ecology. Para 3.5. (page 8)(Natural Heritage) endorses this requirement and refers to both trees and hedgerows.

Response:

Support welcome.

Recommendation:**Reference No. SP0096****Respondent No. 0006**

Mr David Watkins

Natural Resources Wales

General Comments**Summary of Response:**

Para 3.5. - (page 7) Waste Treatment.

The Authority will be aware that there may be a requirement for applicants to seek a permit from NRW for septic tanks and the proposed use of cesspits is not encouraged.

Response:

Noted.

Recommendation:**Reference No. SP0097****Respondent No. 0006**

Mr David Watkins

Natural Resources Wales

General Comments**Summary of Response:**

The draft SPG acknowledges the adaptation and re-use of rural buildings for residential use, which has the potential to affect legally protected species including bats and birds such as barn owls. Whilst we endorse the requirement for appropriate protected species survey information to accompany applications for the conversion of rural buildings, we also advise the following: a. That surveys are undertaken by a suitably qualified, experienced and licensed ecologist; b. That surveys follow published guidance where this exists and best practice; c. Where development proposals implicate protected species, full details of all the mitigation that will be put in place must be included in the planning submission along with the survey information.

Response:

Noted. This is a matter appropriately considered through the Nature Conservation and Biodiversity SPG.

Recommendation:

Amend the SPG to include appropriate cross referencing to the provisions of the Nature Conservation and Biodiversity SPG.

Reference No. SP0098**Respondent No. 0006**

Mr David Watkins

Natural Resources Wales

General Comments

Summary of Response:

General Comment

Providing that there is reference to published survey guidance, there is no need to mention specific survey times, for example for bats. The generic reference to the timing of bat surveys may cause some issues subsequently for the LPA; we suggest this is removed. In stating May-September, it is possible that an applicant may undertake all of their surveys in September, which would be too late to assess a building for its potential to support a maternity roost.

Response:

Noted.

Recommendation:

Amend the SPG as appropriate.

Reference No. SP0099**Respondent No. 0006**

Mr David Watkins

General Comments

Natural Resources Wales

Summary of Response:

General Comment

Your Authority will be aware of our advice in the good practice guide entitled NRW Approach to Bats and Planning, October 2015.

Response:

Noted.

Recommendation:

Reference No. SP0100**Respondent No. 0006**

Mr David Watkins

General Comments

Natural Resources Wales

Summary of Response:

We endorse the cross-reference to the Nature and Biodiversity SPG.

Response:

Noted.

Recommendation:

Reference No. SP0101**Respondent No. 0066**

Mrs Liz Dutch

Object

Llansteffan Community Council

Summary of Response:

Para 1 Fig 5

The respondent objects highlighting the need for a strong emphasis to enter into pre-application discussions at an early stage with the LPA. States that the relevant town or community council must also be informally consulted at this early stage to give the necessary opportunity to voice community interest. States that this would help to address a common local perception that many applications represent "done deals" between developer and the LPA when they reach the statutory consultation stage.

Response:

Noted. However there is no duty on Local Planning Authorities to notify Town and Community Councils relating to schemes at pre-application stage. Section 17 of the Planning (Wales) Act 2015 relates to developers having to consult Town and Community Councils on major applications at the Pre-application stage, but this does not apply to LPAs.

Recommendation:

No change to the SPG

Reference No. SP0102

Respondent No. 0066

Mrs Liz Dutch

Llansteffan Community Council

General Comments

Summary of Response:

Para 3 Fig 3

This comment about the attachment of conditions to planning consents is generic. States that Planning conditions are wholly ineffective without adequate public funding of the planning enforcement section. This fact particularly applies in isolated rural or coastal locations, common throughout Carmarthenshire. Revenue expenditure budgets need serious consideration.

Response:

Noted. This is a matter beyond the remit of the SPG.

Recommendation:

No change to the SPG.

Reference No. SP0103

Respondent No. 0066

Mrs Liz Dutch

Llansteffan Community Council

General Comments

Summary of Response:

The respondent states that a second dwelling on an established farm should not be permitted where the landowner sells / is in the process of selling the first dwelling approved with an Agricultural Occupancy Condition.

Response:

Noted. It should not be the intention of the SPG to cover every eventuality. The policies of the LDP and National Policy covers matters relating to the requirement of the need for a second dwelling on an established farm, including viability and location.

Recommendation:

No change to the SPG.

Reference No. SP0104

Respondent No. 0066

Mrs Liz Dutch

Llansteffan Community Council

Support

Summary of Response:

The detailed guidance about a Rural Enterprise Dwelling helps to clarify the relationship between planning and tourism considerations.

Response:

Noted.

Recommendation:

Reference No. SP0105

Respondent No. 2575

Mr Sean Maslin

General Comments

Summary of Response:

The Rural Development Draft SPG Report, Rural Enterprise Dwellings section does not satisfactorily reflect the requirements set out in TAN 6. The policy requires that all applications are supported by robust supporting evidence and must be supported by a Rural Enterprise Dwelling Appraisal (TAN 6 paragraph 4.7.1) which addresses the functional test, the time test, the financial test, and the other dwellings test. The Rural Enterprise Dwellings section should contain advice on an acceptable maximum gross internal floorspace. For example, a maximum gross internal floorspace of 100 sq m. This area is considered by the Homes and Communities Agency to be the size of property needed to meet the needs of 6 persons, and is larger than the national average for new dwellings of 76 sqm. Similarly, the Rural Enterprise Dwellings SPG should advise that any proposed outbuildings will need to be justified and a planning condition will be imposed to remove permitted development rights for the dwelling to prevent any future extension of the property. The Rural Enterprise Dwellings guidance should also include the additional clarification from the Carmarthenshire Local Development Plan (Housing 6.2.8) which states: "...Such proposals should, where possible, be well related to an existing complex. A further dwelling should not be proposed where an existing property forming part of the unit associated with the enterprise has been recently disposed of."

Response:

Noted. It should not be the intention of the SPG to be prescriptive and repeat the criteria set out in National Policy. TAN6 offers sufficient clarity relating to the criteria for a new rural enterprise dwelling which includes location, siting, appropriateness of scale, viability and functional need etc. This would also cover the requirements of any outbuildings to support the new dwelling, whilst conditions can be placed on planning permissions to restrict domestic paraphernalia

Recommendation:

No change to the SPG