

Carmarthenshire County Council LDP Reg 15 Pre-Deposit Consultation: Welsh Assembly Government Response

We note that a SELF-ASSESSMENT based on the soundness tests has been PROVIDED at Preferred Strategy stage (at Appendix B of the preferred Strategy doc; LDP Manual 6.5.1)	
P1 - Prepared in accordance with the Delivery Agreement including the CIS	
<u>Comments</u>	<u>Suggested Actions</u>
We assume that the Preferred Strategy has been prepared in accordance with the Delivery Agreement. Please advise if this is not the case – the self-assessment doesn't indicate any discrepancies other than the need to revise the plan preparation timetable (Appendix B). PS stresses throughout the role of earlier consultations and work by the Key Stakeholder Forum (KSF) in defining the plan issues, vision, objectives, strategy options.	----
P2 - Subjected to Sustainability Appraisal including Strategic Environmental Assessment (and Habitats Directive Appropriate Assessment)	
<u>Comments</u>	<u>Suggested Actions</u>
<p>SA/SEA: We note that:</p> <ul style="list-style-type: none"> - the Preferred Strategy has been subject to SA/SEA: supporting documentation (Jacobs) '<i>Sustainability Appraisal/ SEA Initial Report</i>' (Nov09) (ISAR) – includes the environmental report - subject of current consultation. (+ SA/SEA Scoping Report Sep08). Strategic objectives, options and policies have been assessed. <p>Habitats Appropriate Assessment - Habitats Regulations Appraisal (HRA): We note that:</p> <ul style="list-style-type: none"> - the Preferred Strategy has been subject to HRA screening: supporting documentation (Jacobs) the <i>HRA Preliminary Screening Report for the Preferred Strategy</i> (Nov09) -subject of current consultation. 25 European Sites potentially affected by the Carmarthenshire Preferred Strategy have been identified. There are a number of Natura 2000 sites designated for their habitats and species which will need to be considered; that HRA is being carried out throughout the production of the plan, and reported separately but parallel to this SA process; that the Preferred Strategy will be screened against the conservation objectives for the Natura 2000 sites and consulted on with the statutory consultees. 	<p>It is vital that the authority is able to demonstrate that it has followed the correct procedure outlined in the SEA Regulations, the Habitats Regulations, has had regard to European Protected Species and that the deposit plan has had regard to the findings.</p> <p>Correct reference should be made to the Wales SEA Regulations and to the Habitats Regulations which transpose the requirements of the SEA Directive and the Habitats Directive respectively</p>

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C1 It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.

<u>Comments</u>	<u>Suggested Actions</u>
<p>We note that Chapter 2 of the preferred strategy aims to provide the national, regional and local context for the LDP and refers to a number of the key relevant plans, policies and strategies:</p> <p>National: WSP People, Places, Futures' 2008Update, PPW, MPPW, MIPPS, Circulars, TANs.</p> <p>Regional: SWW Regional Waste Plan First Review (Recommended Draft March 2008), Progress in Partnership – The Consultation Draft Transport Plan for South West Wales – SWWITCH (July 2008), South Wales Regional Aggregates Working Party – Regional Technical Statement (Oct 2008), Open All Year – A Tourism Strategy for South West Wales 2004-2008.</p> <p>Local: Carmarthenshire Community Strategy 'Thinking together, Planning Together, Doing Together' 2004/2020, Carmarthenshire Unitary Development Plan (Adopted 2006), Carmarthenshire Connexions: A Strategy for Prosperity 2005-2015, Carmarthenshire Local Biodiversity Action Plan (LBAP), Carmarthen Bay Shoreline Management Plan, Carmarthenshire's Local Transport Plan 2001-2006, A Step on the Ladder – Carmarthenshire County Council, Local Housing Market Assessment 2007 – Carmarthenshire County Council, People, Homes and Communities – Carmarthenshire's Housing Strategy 2007-2010, Carmarthenshire County Council – Corporate Strategy 2007-2012, Carmarthenshire Municipal Waste Management Strategy Development (Carmarthenshire County Council 2004), A Local Development Strategy for Rural Carmarthenshire: Rural Development Plan 2007-2013, A Tourism Vision for Carmarthenshire 2005-2015, Carmarthenshire Children and Young Peoples Plan 2008-2011 (Draft Consultation), Renewable Energy Route Map for Wales, Carmarthenshire Sustainable Development Strategy, Health, Social Care and Well-being Strategy.</p> <p>The SA/SEA Scoping Report (Sep08) sets out a more full review of relevant plans and policies at all levels including international / European.</p> <p>Relationships: Limited reference is made to collaborative & cross border working (2.6); in particular WSP working - Pembs Haven Area Settlement Complementarity Study (with WAG / PCC / PCNPA), South West Wales Regional Planning Group (SWWRPG) information sharing forum + pathfinder group. (SWWRPG includes Carms, Ceredigion, Neath Port Talbot, Swansea, Pembs, PCNP and BBNP). The relationship between the plan area and the Brecon Beacons National Park plan area is not really clarified other than acknowledging the park.</p>	<p>Ensure that contextual strategies have collectively influenced the strategy, and that it made clear how they have done so. This includes emerging strategies of key neighbouring LPAs.</p> <p>Coordinate cross border designations and approaches.</p> <p>Provide clarification of any regional issues (e.g. flooding, infrastructure, utilities). Consider the impact of neighbouring authorities' development plan issues and strategies and how these will impact the</p>

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<p>The authority should look at the emerging development plans of neighbouring authorities and explain their implications for any significant cross border issues. The neighbouring authorities' preferred strategies could have an impact on the role and function of the authority and influence the strategy. It is important the authority provides evidence of collaborative working for example on housing, infrastructure, utilities e.g. recorded meeting notes, to ensure a robust evidence base. The submitted LDP will need to have regard to any joint working for housing provision</p>	<p>future role and function of the authority and influence the strategy; clarify the relationship with the BBNP. Ensure adequate collaborative working, and provide evidence of it e.g. recorded meeting notes, to ensure a robust evidence base.</p>
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C2 It has regard to national policy.	
<u>Comments</u>	<u>Suggested Actions</u>
<p>LDP Wales (and PPW Companion Guide) makes clear that though LDPs must have regard to national policies, they should not repeat them, but rather explain how they apply to the local area. The draft strategic policies in the preferred strategy document should be the key delivery mechanisms for areas of change in the preferred spatial strategy (LDP Manual paragraph 6.5.1).</p> <p><i>N.B. Comments in relation to national policy are included under soundness tests CE1 & CE2</i></p>	<p>Review, refine or supplement the strategy and deposit plan proposals to implement national policy where appropriate. The deposit plan should have a clear statement on the application of national policy; it should also incorporate a form of notation that makes clear when national policy will apply.</p> <p><i>See comments under soundness tests CE1 & CE2</i></p>

C3 It has regard to the Wales Spatial Plan	
<u>Comments</u>	<u>Suggested Actions</u>
<p>The LDP strategy is considered to have had regard to, and to be broadly in line with, the Wales Spatial Plan.</p> <p>Ch.2 sets out the vision and priorities for each of the relevant three spatial plan areas relevant to Carmarthenshire, namely Pembrokeshire – The Haven, Swansea Bay – Waterfront and the Western Valleys and Central Wales; these contribute to the national and regional issues and drivers (4.2). Integration of, and complementarity between, emerging LDPs within the appropriate spatial plan areas is crucial to ensure that, taken together, the plans will help realise the WSP vision and objectives. The Preferred Strategy should provide a framework to enable the three key settlements to fulfil their strategic</p>	<p>Ensure there is regional complementarity between emerging LDPs. In terms of the future roles and functions of settlements, the role of ongoing WSP</p>

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<p>functions over the plan period.</p> <p>The preferred strategic spatial option is the option that appears to be the most consistent and compatible with the WSP themes as they apply to the County of Carmarthenshire.</p> <p>The preferred strategy (7.1 – 7.6) and its expression in terms of the settlement hierarchy (which will be the determinant of growth allocations) appears to be entirely consistent with the WSP Update.</p>	<p>work (e.g. the Settlement Complementarity Study) should be identified in the deposit plan and evidence base.</p>
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C4 - Has regard to the relevant community strategy/ies.	
Comments	Suggested Actions
<p>Section 2.4 identifies the Community Strategy, 'Thinking together, Planning Together, Doing Together' 2004/2020, and advises of an ongoing review (no timescale provided) that will be monitored the LDP reviewed if required.</p> <p>The 5 pillars of the CS are used to group the issues the LDP seeks to address (4.3.2 & table 3). LDP vision has regard to CS vision (5.2.3).</p> <p>The timescale are similar for the visions of both the CS (to 2020) and the LDP (to 2021).</p> <p>The self-assessment soundness test says that the LDP Preferred Strategy has had regard to, and seeks to implement, the Community Strategy.</p>	<p>Ensure evidence base clarifies whether a review of the emerging strategy is necessitated by the current review of the Community Strategy</p>

CE1 The plan sets out coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities	
&	
CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives, and/or are founded on a robust and credible evidence base	
Comments	Suggested Actions
<p>The Preferred Strategy documentation should make clear what the key issues are that the LDP will address, what the plan vision is, what the plan objectives are, what strategic spatial options were considered and what the preferred spatial strategy is (see LDP Manual section 6.5). These are identified in the Preferred Strategy document at chapters 4 to 6.</p>	<p>----</p>
<p>14 headline issues are identified within a total of 69 issues and drivers covering everything, comprising 16</p>	<p>Review the issues to identify the key</p>

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<p>national & regional (NRID), and, 53 local (LID) grouped under the 5 strategic pillars of the Community Strategy. The 14 headline issues are underlined in the issues section & captured in word-bites in Table 3 page 32 grouped under the Community Strategy's 5 pillars (Ch4). The PS advises that stakeholder engagement and consultation and a review of baseline data have resulted in identification of the issues (4.1.1). This section follows an overview of the profile of Carmarthenshire (Ch 3) which outlines the geographical context and reviews the environmental, social and economic characteristics of the area.</p> <p>It is critical that the issues developed are transparently evidence-based. It may be of benefit to clarify the key questions that the strategy needs to address (e.g.under each of the abbreviated key issue headlines in Table 3). It would benefit the focus of the LDP strategy and deposit plan if a small number of critical land-use issues were clearly identified which the LDP will aim to address and to deliver on.</p>	<p>critical land-use issues which the LDP will aim to address and to deliver on. Ensure it is clear what the key questions are that the strategy needs to address, the required action by the LDP, and consequently, the monitoring framework.</p>
<p>The generic initial part of the LDP vision is made more clearly spatially relevant by the inclusion of its second section; it does provide some indication of the desired position by 2021.(chapter 5 Fig6). We note that the vision follows on from the identified headline issues by including key words from Table 3. This integral vision is essential to ensure it is locally distinct with a spatial dimension and relevant to land use planning. A vision specifically for the LDP is welcomed, rather than simply adopting the generic Community Strategy Mission Statement.</p>	
<p>14 LDP objectives are identified grouped under the Community Strategy's 5 pillars and referenced to the issues and drivers (NRID / LID) (Ch5 Table 4). Links to identified issues and drivers is welcomed, as is information on appraisal (5.4). They are distinct from the SA/SEA objectives. Whilst the Strategic Objectives are largely generic and lack local distinctiveness, each objective is supported by a 'spatial commentary' which includes reference to issues being addressed, how it will be achieved / delivered, timescale & monitoring. However, the timescale and monitoring information lacks any detail . The strategic objectives and spatial commentary could be merged to form objectives based on local issues that can be measured in accordance with SMART principles, including details of the actions that need to be taken to achieve the vision with timescales where appropriate; this would make them easier to monitor and ensure the strategy is being delivered.</p>	<p>Consider developing into SMART locally distinct spatial objectives to aid clarity for monitoring; ensure that any links / inconsistencies / conflicts between objectives are identified and also identify any prioritisation that is required.</p>
<p>Preferred strategy from strategic options: 5 strategic spatial options have been developed and assessed (Ch6). - sustainable distribution is the preferred option which also reflects the current UDP approach.</p> <p>➤ Sustainable Distribution - establishes a hierarchy of settlements reflecting the diversity of the County,</p>	<p>Ensure that the selection of a preferred spatial option is clearly and firmly founded on robust evidence, and that the</p>

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<p>based on the principles of sustainable development. This option encourages the dispersal of employment, housing and other types of development to identify settlements and village groups or clusters, allowing a range of opportunities for growth across the County, whilst protecting the natural environment and limiting the need to travel.</p> <ul style="list-style-type: none"> ➤ Urban Growth – which reflects sustainability principles by solely promoting the consolidation of existing urban areas, where the largest proportion of population already live and work, and where a high level of services are provided. Development outside identified urban area will be strictly controlled. Most new housing/ development will be steered towards Llanelli Area (Including Burry Port/ Pembrey), Ammanford/ Cross Hands Area, and Carmarthen. ➤ Dispersal – distributes housing, employment and other forms of development on a broad basis between settlements within the County, both urban and rural. ➤ No Strategy – presumes the absence of any development plan within the County. ➤ Market Led – aims to meet aspirations and requirements of investors and developers of the development industry by identifying sites and areas which are the most economically attractive to develop. Focus on key transport routes. Development encouraged alongside major roads in the County and at key junctions. <p>It is not made clear how effective the UDP Sustainable Distribution strategy has been to date and whether there have been any changes in the main issues that it was intended to address; this would be an important contributory piece of evidence as to why it would be fit for purpose for the LDP. LDP strategy needs to be adequately justified to avoid any assumption that it has been chosen purely because it was the identified strategy for the UDP.</p> <p>Note that the Strategic Spatial Options Draft Topic Paper (section 4.6 page 16) advises that in developing a spatial strategy a number of important considerations need to be taken into account (naming sustainability, climate change, flooding, accessibility & infrastructure, pop/hhld projections / implications of growth, employment land requirements. Whilst each option has been subject to SA/SEA, it is not clear how these 'important considerations' have influenced the choice of options & the preferred option.</p> <p>Growth potential (6.4 & Table 6) - 3 growth options considered are;</p> <ol style="list-style-type: none"> 1) Higher Variant option, Household Requirement of 15,230 which requires 1,015 dwellings p.a.. 2) Principal Projection option, Household Requirement of 13,405 which requires 893 dwellings p.a. (the preferred growth option) 3) Lower Variant option Household Requirement of 11,406 which requires 760 dwellings p.a.. <p>It is noted that a regional housing apportionment exercise has not been undertaken.</p>	<p>role of stakeholders in developing it is appropriate; and that it is clear in how it will achieve the plans objectives. Ensure adequate clarity on how the options selected are realistic options for meeting the plan objectives.</p> <p>A 'no strategy' option is a misnomer as it is not a realistic option given that there is an extant UDP – consider whether a 'business as usual' trend-based scenario would be preferable.</p> <p>Ensure that the spatial strategy is suitably supported by the SA.</p> <p>Evidence the effectiveness of the UDP Sustainable Distribution strategy to date.</p> <p>Ensure preferred growth option is clear and supported by robust evidence clarifying the regional situation and linked to the issues and considerations specific to the plan area.</p> <p>Consider if a review of the growth options is required to take account of the WAG 2006-based household projections. Ensure that the eventual preferred growth option can be delivered, is</p>
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Whilst the 'principal' 2006-based WAG population projection has been used; the latest **WAG 2006-based household projection is currently not being used (17,900 additional household requirement;** from 78,000 in 2006 to 95,900 in 2021), rather the strategy is based on a significantly lower household requirement of **13,405** (893 p.a.) until the LPA gives full consideration to the WAG household projections. (see also 7.8.5). The publication of WAG household projections has been accompanied by **circular letter CL-02-2009** providing advice on how LPAs should respond in relation to emerging LDPs. The Draft Topic Paper should be reviewed to take account of this information. The final position will need to be fully explained and evidenced. *(Also see comments at 'Housing' below.)*

The plan uses this preferred level of growth to appraise the spatial impact of the 5 strategic options in terms of the proportional distribution of development.

The '**sustainable distribution**' preferred strategy (Ch7, SP3 & Key Diagram) proposes that **settlements** are classified into a hierarchical framework reflecting the potential for accommodating growth and development (7.3.1). The settlement hierarchy is based on the sustainability credentials, size, population, location and availability of services and facilities, infrastructure capacity and accessibility of existing settlements (7.3.2); also the Wales Spatial Plan (7.3.3). PS acknowledges there is some outstanding work on settlement hierarchy to determine what level of growth can be accommodated (see Llanelli para 7.4.3).

Result is a **4-tier settlement hierarchy**, comprising:

- growth areas (Carmarthen, Llanelli, Ammanford / Cross Hands);
- tier 2 settlements – table 12 page 70 - six named;
- tier 3 settlements – table 13 page 71 - 11 named;
- tier 4 settlements – table 14 page 73 - smaller named settlements grouped (or stand-alone) to form 42 'sustainable communities' (SC) to allow allocation of development to an SC rather than individual settlements – basis is requirement for 4 specified facilities/services – post office, shop, primary school, hall (7.6.5). Intend that land allocations will be identified in most SCs (7.6.4).
- + open countryside (groups of dwellings not comprising a settlement).

The settlement hierarchy appears logical and in accordance with the overall strategy.

The current UDP has **settlement limits** – it would appear that the LDP will also have these (7.7.2). An evaluation of the UDP settlements is yet to be conducted (7.7.2).

6 Strategic sites are identified (7.5, SP4 & Key Diagram Fig16 page 97). It is noted that a review is required for the deposit plan (7.5.1 & AppD). The deposit plan should signify where Masterplans will be appropriate.

Commentary on options at Table 11 page 61 – provides helpful consideration in relation to community strategy, tests of soundness and initial SA/SEA assessment.

flexible to adapt to changing economic circumstances and is thoroughly evidenced.

Any deviations from the 2006 WAG household projections will need to be articulated.

Clear evidence addressing linkages to the issues and any implications arising should also be presented.

A detailed review of **settlements** must ensure the strategy is robustly evidenced and establish the level of growth that can be accommodated at each tier. The capacities for development within various settlements needs to be evidenced and clarified.

If settlement limits are to be imposed, it must be evidenced to be appropriate to the 'sustainability communities' approach.

Ensure that proposed strategic sites are appropriately reviewed. Consider Masterplan requirement. The deposit plan should be sufficiently flexible and provide contingencies should a strategic site prove

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<p>Deliverability of the strategy – see comments at CE3 below.</p>	<p>undevelopable; it should at a minimum indicate the plan's priorities.</p>
<p>Evidence – robust and credible: Background Studies / Evidence Base are referenced –</p> <p>The PS (page 5) advises that its preparation has been informed by, and is supported through, a robust evidence base including a range of background papers and documents....and include the following: Discussion Paper; SA-SEA Scoping Report; LDP Key Stakeholder Forum Consultation Reports; Population and Housing Topic Paper; LDP: Population and Household Projections Report; Issues, Vision and Objectives Topic Paper; Strategic Spatial Options and Settlement Hierarchy Topic Paper. Also Initial Sustainability Appraisal / Strategic Environmental Assessment Report Nov2009; Habitats Regulations assessment Preliminary Screening Report Nov 2009</p> <p>However, Draft Topic Papers (May09) have not yet been amended following consultation. (We provided comments on the draft Topic Papers in June relating to housing, affordable housing, gypsy/travellers, spatial cohesion, key issues for plan, vision, strategic objectives, strategic options, settlement hierarchy. The PS states comments have been taken into account in preparation of PS document (para 1.2.7). :</p> <p>We note that a number of studies in the evidence base are not yet completed or have not been made available with the PS documentation. This is particularly clear in the resultant generic strategic policies that fail to provide a local focus for national policy.</p> <p>We would draw attention in particular to being clear about:</p> <ul style="list-style-type: none"> - any regional apportionment of housing - that the viability and delivery of affordable housing provision is demonstrated - the landscape and environmental capacity of the area - the location of best and most versatile agricultural land quality - the location of sites vulnerable to flooding - minerals - waste - that the issue of infrastructure constraints and required solutions is fully detailed. 	<p>It is vital that an appropriate robust and credible evidence is available and its influence in developing and supporting the strategy is clear in the Deposit plan, including if studies arrive at differing conclusions from those that have formed the basis for the draft preferred strategy. It is important that there are suitable clearly referenced background papers to accompany the deposit plan.</p> <p>Ensure that policies are drafted to clearly reflect the local circumstances and evidence base.</p>
<p>Clarification of how the site assessment process (through the site assessment methodology) will work is provided (appendix D); sites evaluated include Candidate Sites (AppC), sites allocated in the UDP but not</p>	<p>----</p>

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<p>developed, any other appropriate site (it isn't clear where these have come from). The methodology indicates a 3-phase assessment of all candidate sites which were submitted, and includes determining potentially strategically significant sites, sifting out of non-strategic sites unsuitable to the implementation of strategic objectives, and SA/SEA appraisal of all sites remaining.</p>	
<p>Implementation & Delivery; Flexibility; Monitoring – see comments at CE3 & CE4 below</p>	
<p>SPG - Reference is made (1.4) to the preparation of SPG in conjunction with the LDP “where it is considered appropriate”. Information on the SPG programme should be provided in the Deposit plan.</p>	<p>Information on the SPG programme should be provided in the deposit plan.</p>
<p>Strategic Policies (ch.8, SP1-18; some justification in Ch7) – 18 policies on a topic basis with links to relevant objectives.</p> <p>A significant number of Strategic Policies appear vague and generic and as such fail to provide the local dimension for national planning policy or lack the required detail.</p> <p>The links to the Strategic Objectives under each policy is welcomed.</p>	<p>Reconsider the need to redraft strategic policies for greater relevance and local focus; add necessary detail from the emerging evidence base.</p>
<p>Agricultural land</p> <p>Where the strategic development sites at Carmarthen, Cross Hands/Ammanford and Llanelli (as currently presented) are located on undeveloped land, they affect poor to moderate quality agricultural land and therefore are consistent with the operation of PPW 2.8.1.</p>	<p>Ensure the deposit plan is based on an assessment of the agricultural land quality of development sites and directs development away from best and most versatile agricultural land.</p>
<p>Gypsies & Travellers</p> <p>Consideration and provision is required in accordance with WAG Circular 30/2007 and MIPPS 01/2006; including being based upon an Accommodation Needs Assessment of Gypsies Travellers (sections 225 and 226 of the Housing Act 2004). The needs of Gypsy Travellers have not been considered for the Preferred Strategy; we note that LID38 (page31) says that need will be addressed in the plan.</p>	<p>Ensure that the required Accommodation Needs Assessment (ANA) for Gypsy and travellers informs LDP preparation. Ensure appropriate site(s) are identified in the deposit plan (both permanent and transit) along with an appropriate criteria based policy.</p>
<p>Employment (SP7 & 7.12)</p>	<p>The deposit plan and its evidence base</p>

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<p>There is no specified employment land figure and a lack of information to establish the related coherence of the strategy.</p> <p>It is stated that the Employment Land study (6.2.9 - 6.2.11) includes a comprehensive review of employment sites and this forms the basis of considerations for the future employment land supply. We have not been provided with this document; 7.12 indicates that it is not yet finalised. It is not clear whether the study has informed the Preferred Strategy or vice versa (7.12.3).</p> <p>Distribution of existing sites is identified (Figure 9) and reflects population pattern (Figure 8).</p>	<p>should:</p> <ul style="list-style-type: none"> - clarify relationships with neighbour authority employment strategies / allocations; - identify any strategic employment sites; - be robust and realistic in terms of employment land allocations and their deliverability; - clarify the inter-relationship between housing and employment land allocations within the plan area and with neighbouring plan areas.
<p>Historic Environment (SP13 & 7.15)</p> <p>Cadw has advised that it is content that national policy issues have been addressed in the Preferred Strategy in relation to the historic environment; also that the PS has an objective and policies to protect, enhance and manage the historic environment. Account has been taken of the impact of proposed options on the historic environment through the process of the SA/SEA. Cadw is unable to comment on the suitability or otherwise of the proposed Strategic Sites since information is not available to it. The Dyfed Archaeological Trust is carrying out assessments of candidate sites and advises the LPA on the sensitivity of sites with respect to historic features. It is important that due account will be taken of this advice in the preparation of the final strategic site list.</p>	<p>----</p>
<p>Housing (SP5 & 7.8-10)</p> <p>In accordance with Ministerial Interim Planning Policy Statement 01/2006, <i>Housing</i>, the Preferred Strategy utilises the Assembly Government's 2006 based Population Projections. However, a regional apportionment exercise has not been carried out as the SWWRPG decided not to do this. The Topic Paper on 'Population and Housing' provides details of how the Council has utilised the Assembly Government Population Projections to calculate their housing requirement. However, the Assembly Government's 2006 based Household Projections (published June09) for Carmarthenshire have not yet been taken into account. The publication of WAG household projections has been accompanied by circular letter CL-02-2009 providing advice on how LPAs should respond in relation to emerging LDPs.</p>	<p>The deposit LDP should:</p> <ul style="list-style-type: none"> - provide robust housing figures which are adequately evidenced in accordance with national policy; - include a robust affordable housing target; - provide threshold(s) to deliver affordable housing and clarify the reasons for them with suitable

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<p>The Preferred Strategy proposes to provide 13,405 new housing units over the plan period (893 p.a.). The Assembly Government's Household Projections for Carmarthenshire indicate that 17,900 units are required (1,193 p.a.). This substantial difference could have significant implications for the Strategy and in particular for the allocation of land for housing. Although the authority's 2007 Local Housing Market Assessment (LHMA) is referenced in relation to affordable housing (see below), it is not mentioned in relation to assessing the overall housing requirement. Also, the need to consider the housing proposals of neighbouring authorities, given that housing market areas can cross local authority boundaries, does not appear to have been addressed.</p> <p>According to section 7.10, the distribution of housing is based on the current proportion of the population per tier of the settlement hierarchy. This process does not appear to have taken account of any locational requirements identified in the authority's LHMA.</p> <p>Affordable Housing (SP6 & 7.11)</p> <p>Affordable housing delivery is a Ministerial priority of the Welsh Assembly Government ("One Wales" commitment).</p> <p>A target for affordable housing has not yet been established as the results of the 2008 LHMA are not yet available. However, the 2007 LHMA indicates an overall requirement for 1,332 affordable homes per annum (i.e. more than the total housing provision proposed in the Preferred Strategy). The authority's Affordable Housing Delivery Statement (AHDS) sets out a four year target (2007-11) of 678 units from all sources (170 p.a. – 13% of the identified need). Provision at this level would result in substantial unmet need which the Preferred Strategy does not currently address. Despite this the provision of affordable housing is not included as a "headline" issue for the LDP.</p> <p>A threshold of 5 is established in policy SP6 for the provision of affordable housing, but the Strategy is unable to set out how this will meet the affordable housing target as a target has not yet been set. There is also no information about whether any viability testing has been carried out (or is planned before the LDP target is established) to test the achievability of this threshold. We note your intention to do further work and produce a topic paper on affordable housing.</p>	<ul style="list-style-type: none"> - viability studies; - evidence collaborative working with neighbouring LPAs in identifying housing requirements; - clarify the inter-relationship between housing and employment land allocations within the plan area and with neighbouring plan areas. <p>Consider whether a review of the growth options is required, to take account of the Welsh Assembly Government's 2006 based household projections.</p> <p>Consider whether to develop a phasing policy to ensure a spread of development throughout the plan period.</p>
<p>Landscape and biodiversity (SP14 & 7.16)</p> <p>The LDP should be consistent with the Biodiversity Duty placed on all public bodies by the Natural Environment and Rural Communities Act 2006.</p>	<p>Ensure adequate account is taken and the evidence base robust</p>

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<p>Strategic objective SO4 is to ensure that the natural environment is safeguarded and enhanced and that habitats and species are protected. The Preferred Strategy advises that a biodiversity study will inform the deposit plan (7.16.2).</p> <p>Introduction of any landscape designations in the deposit plan will need to be suitably evidenced.</p>	
<p>Minerals (S10 & 7.17)</p> <p>There is limited minerals evidence presented at this stage, e.g. evidence of landbanks including dormant sites/permissions and landbank figures, possible prohibition orders, current operations/production levels and expected future contribution (outlined in the RTS), mineral resources potential for secondary or recycled aggregates, inactive dormant sites, proposals for restoration, and the mineral reserves that should be safeguarded.</p> <p>The Deposit LDP should ensure that a landbank for aggregates is maintained and safeguarded having regard to the RTS; mineral resource is safeguarded up to settlement boundaries; efficient use of materials is considered.</p> <p>Mineral safeguarding and mineral allocations for working will need to be shown on the proposals map; the plan needs to be as clear as possible as to areas where coal should not be worked in the plan period.</p>	<p>The deposit plan should:</p> <ul style="list-style-type: none"> - adequately safeguard mineral resources in line with national policy and consistently across boundaries with neighbouring LPAs; - adequately provide for the contribution to aggregates production over the plan period identified in the RTS; - be as clear as possible as to areas where coal should not be worked; - include Buffer Zone and dormant site requirements; - clarification on serving prohibition orders would be of assistance; - be supported by robust background evidence.
<p>Renewable Energy (SP11 & 7.20)</p> <p>National policy as contained in the Ministerial Interim Planning Policy Statement and TAN 8 encourages the use of renewable energy and requires local planning authorities to facilitate the development of all forms of renewable energy. The MIPPS states that local planning authorities should undertake an assessment of the potential of all renewable energy resource; renewable energy technologies, energy efficiency and conservation measure and include appropriate policies in LDPs.</p> <p>TAN8 provides targets not ceilings; work for the deposit plan should consider whether those target figures can be increased for the LDP.</p>	<p>Ensure that adequate consideration and assessment is evidenced; and that the deposit plan contains appropriate policy coverage.</p>

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<p>SP11 Renewable Energy is a very generic policy and there is no evidence that the required assessment has been undertaken. Further consideration needs to be taken into securing benefits for Renewable Energy, Energy Efficiency and Conservation, particularly where large scale growth is envisaged. The policy recognises the Brechfa Forest Strategic Search Area.</p>	
<p>Retail Hierarchy (SP8 & 7.13)</p> <p>The plan identifies 3 important centres in the retail hierarchy, Carmarthen, Llanelli and the Cross Hands/ Ammanford areas. Results from 2009 Retail Study for Carmarthenshire will be used to inform policy on retail location (6.2.12)</p>	<p>The deposit plan and its evidence base should be suitably robust and clear</p>
<p>Sustainable Development (SP1 & SP2 & 7.18)</p> <p>Design In accordance with MIPPS (01/2008) 'Planning for Good Design', the Preferred Strategy has set out in policies SP1 and SP2 the design expectations for new development proposals. However, further detail will be needed at the deposit stage to explain the implementation mechanisms to ensure these expectations are considered in the decision making process.</p> <p>Planning for Sustainable Buildings In the assessment of strategic sites (D2 Phase 1) the preferred strategy is not in accordance with para 2.12.15 which expects LPAs to assess the potential for strategic sites to meet higher sustainable building standards. However, it is recognised that the MIPPS (01/2009) was published after this site sieving process had been complete and consulted on. In this instance the local planning authority should consider what opportunities are available in the further analysis (Phase 3) to identify opportunities for higher building standards (including zero carbon) to be required (para 2.12.5).</p> <p>It is also unclear whether strategic objective SO5 had a bearing on the assessment of strategic sites as set out in the Appendix..</p>	<p>Expand and / or consider as indicated for deposit plan. Determine any policy requirement for local distinctiveness in design; also where Masterplans may be appropriate.</p>
<p>Waste (SP12 & 7.14)</p> <p>LDPs should identify sites for local and regional waste facilities or areas where such facilities may be suitable in line with PPW (12.5.4), and having regard to the requirements identified in the Regional Waste Plan. Para 7.14 of the PS recognises this.</p>	<p>The deposit plan must:</p> <ul style="list-style-type: none"> - be supported by background evidence;

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<p>Policies and proposals should be based on evidence, including;</p> <ul style="list-style-type: none"> - why the sites have been chosen for the location of suitable waste facilities; and - the ability of the sites to accommodate site waste management facilities required to meet regional and local needs (e.g. suitability and availability). <p>Sites allocated for waste management in the LDP should be identified on the proposal map.</p> <p>Policies proposing any major new development should incorporate adequate and effective waste management facilities.</p>	<ul style="list-style-type: none"> - identify sites for local and regional waste facilities.
<p>Water and flooding</p> <p>Whilst flooding is identified as a local issue & driver for Carmarthenshire(pages 28 & 29), it is not a “headline” issue despite what is said in the spatial commentary to SO5 and in para 7.19.1. Note that there is no strategic policy on flooding.</p> <p>The PS advises that the Strategic Flood Consequences Assessment is yet to be commissioned (page 37) (although we understand that you now intend to do this work inhouse); as this should guide the strategy the work would appear to be overdue.</p> <p>It is important that Deposit plan allocations and policies are in line with the TAN 15 and updated DAM maps and that sites in zones B and C are assessed in line with the requirements of TAN 15 to draw out any implications of this for the deposit LDP.</p> <p>Issues of surface water flooding should be addressed – this is recognised at para 7.19.1.</p> <p>Any water quality issues should also be addressed (Burry Port).</p>	<p>Ensure that the final strategy is informed by the SFCA and that flooding issues are suitably addressed in the deposit plan.</p>
<p>Water infrastructure (SP17)</p> <p>National planning policy states that spatial choices should be based on, and influenced by, evidence of capacity and ability for delivery. If the provision of water/sewerage infrastructure is required, the measures needed and where, how and when they could be secured should be identified in the deposit plan. It would be useful to consider: current capacity, implications of public investment programmes, co-ordination of any improvement works, the need for phasing, and any other relevant delivery issues. Although it is unnecessary to reiterate national policy, the local implications of how infrastructure capacity and provision impact on the preferred strategy and its delivery should be clearly outlined.</p>	<p>Ensure that water / sewerage infrastructure implications for the plan’s strategy and allocations are suitably addressed in the deposit plan.</p>

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<p>Early engagement with Dwr Cymru will provide useful information on the deliverability of development in terms of infrastructure provision.</p>	
<p>Welsh Language (SP18 & 7.23)</p> <p>PPW paragraph 2.10.2 states that local planning authorities should consider whether they have communities where the Welsh language is part of the social fabric. Policy SP18 The Welsh language states the LDP will have regard to the need to safeguard and promote the interests of the Welsh Language when assessing the merits of development proposals and when determining the scale and location of new development. Linguistics Impact Assessments will be required for certain developments in “language sensitive areas”, this is to be defined by SPG.</p>	<p>Ensure that adequate consideration and assessment is evidenced; and that the deposit plan contains appropriate policy coverage.</p>

CE 3 There are clear mechanisms for implementation and monitoring	
<u>Comments</u>	<u>Suggested Actions</u>
<p>Implementation and Delivery</p> <p>Information on implementation and delivery in the deposit plan is critical.</p> <p>The deliverability of the preferred option has not really been addressed in the Preferred Strategy nor in the soundness self-assessment. When developing the deposit plan more consideration should be given to this matter, with clarification of what infrastructure is critical to the delivery of the strategy (versus what is desirable), and how it will be delivered, including timescales for implementation, and impacts on the delivery of affordable housing should also be fully explored. There is an indication that flooding issues, sewerage infrastructure and other constraints are significant issues, and it is not entirely clear that these have yet been fully explored; these may prejudice the delivery of the spatial growth strategy in certain areas and affect the soundness of the plan. Section 106 priorities should be made clear.</p> <p>A monitoring framework (ch9 & Table 16) sets out indicators and targets as a basis for assessing the effectiveness of the strategic policies. Targets appear to be vague or not yet established; there are no links to Strategic Objectives; indicators are generic, with limited local distinctiveness or links to the identified key issues.</p> <p>A developed monitoring framework should consider plan objectives, strategic and relevant non-strategic policies together with principal implementation routes, responsibility for implementation (including stakeholder</p>	<p>Ensure that the key elements of the strategy can be delivered, and that proposed timescales for this delivery are provided. Funding streams, key delivery agents, and infrastructure requirements will need to be identified at an early stage.</p> <p>Section 106 priorities must be made clear.</p> <p>Ensure the monitoring and implementation framework will be satisfactory for measuring the effectiveness of the plan strategy and policies, and that WAG core indicators are included. (and see LDP Manual paragraph 9.5)</p>

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involvement), timescale, resource implications, targets (along with directions of travel and milestones), phasing and indicators. Contingencies and triggers for review should also be considered. Ensure that WAG core indicators are included.

The following comments relate to only some specifics in the monitoring framework; this does not imply others are adequate:

SP1 Sustainable Places

A proposed indicator for SP1 is to record the number of planning applications that comply with BREEAM standards (to 'very good' and 'excellent' standard). There is no policy context for using BREEAM as a standard for development within the Preferred Strategy, including no reference to MIPPS (01/2009). Furthermore, this indicator should make it clear BREEAM is for non-residential development.

SP2 Climate Change

Similarly for SP2 it proposes an indicator on the number of new dwellings constructed to the Code for Sustainable Homes standard. Again, there is no policy context for using the Code within the Preferred Strategy (reference to the MIPPS (01/2009) would be beneficial in this regard).

SP1/SP2 Summary

The indicators for monitoring SP1 and SP2 make reference to the sustainable building standards (the Code for Sustainable Homes and BREEAM). It is unclear why they are separated between the two policies, and why only certain levels are to be monitored rather than the whole range of levels (i.e. Code levels 1 to 6). These proposed indicators are the first instance where sustainable building standards are considered in the preferred strategy.

Further explanation on the 'Method/Source' to collect this data is needed.

SP5 & SP6 Housing / AH

SP6 does not provide clear information on the mechanisms that will be used to deliver the affordable housing target (once established). A threshold is referred to, but until the target is set it is not possible to assess whether this will be appropriate for meeting the target.

The indicators for monitoring the delivery of SP5 and SP6 make no reference to updates of the LHMA for changes in the housing market, local income levels, etc.

SP11 Renewable Energy

The proposed target for SP11 Renewable Energy suggests monitoring the sites that incorporate on-site renewable energy. This needs to be reviewed against MIPPS (01/2009) which seeks to deliver carbon emissions

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through both energy efficiency and on-site renewable energy. Furthermore there is no detailed policy context to promote on-site renewable energy in new development proposals.

CE 4 It is reasonably flexible to enable it to deal with changing circumstances

Comments

The deposit LDP should be sufficiently flexible to enable it to deal with changing circumstances (such as a key site not coming forward for development), and identify any contingencies that might be in place, or what would trigger a review of the Plan.

At present it is difficult to assess whether the PS is sufficiently flexible given that key elements of many policy areas have not yet been finalised. There certainly needs to be some flexibility in terms of housing land requirements as a response to the current economic climate.

It is unclear whether the policies proposed will facilitate the delivery of future zero carbon standards in the authority area.

Suggested Actions

Ensure the strategy and deposit plan is sufficiently flexible to respond to changes in the economy, housing market assessment, key site take up and other changes.