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Dear Tom

**Swansea Council – Replacement Local Development Plan (LDP) Preferred Strategy  
Consultation: Welsh Government Response**

Thank you for consulting the Welsh Government on the Swansea Council Replacement Local Development Plan (LDP) – Preferred Strategy. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities and businesses and provide a robust basis for decision making.

Without prejudice to the Minister's powers, the Welsh Government is committed to assisting Local Planning Authorities (LPAs) minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in 'general conformity' with Future Wales: The National Development Framework, aligns with Planning Policy Wales (PPW) and the tests of soundness, as set out in the LDP Manual Edition 3.

National planning policies are set out in Planning Policy Wales (PPW) Edition 12 and seek to deliver high quality, sustainable places through a place-making approach (the LDP should ensure it considers any further iterations of PPW prior to the examination). The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). **We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' to be followed. Failure to comply with these key requirements may result in unnecessary delays later in the plan making process.** The development planning system in Wales is evidence-led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination.

**After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that the Preferred Strategy is in general conformity with Future Wales: The National Development Framework.** Specific comments are set out in the Statement of General Conformity (Annex 1). **Annex 2 also highlights a range of issues that need to be addressed for the plan to align with PPW and the DPM by the time the plan reaches Deposit Stage.** Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound' as follows:

## **Annex 1 – General Conformity with Future Wales**

- Regional Collaboration - Continued/further detail regarding the relationship to Neath Port Talbot's emerging LDP & Carmarthenshire's LDP.

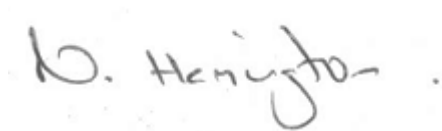
## **Annex 2 – Core matters that need to be addressed (PPW and the DPM)**

- Affordable Housing Provision
- Delivery & Implementation – Including Viability Evidence
- Gypsy and Travellers
- Renewable Energy
- Flood Risk – Revised TAN15
- Minerals
- Best and Most Versatile Agricultural Land (BMV)

I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters' rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being, and inequality.

My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.

Yours sincerely,



**Neil Hemington**  
**Chief Planner Welsh Government**

For matters relating to general conformity with Future Wales and planning policy please contact: [PlanningPolicy@gov.wales](mailto:PlanningPolicy@gov.wales) / For matters relating to Local Development Plan procedures and compliance with the Development Plans Manual please contact: [mark.newey@gov.wales](mailto:mark.newey@gov.wales) and [candice.coombs001@gov.wales](mailto:candice.coombs001@gov.wales)

## Annex 1 - Statement of General Conformity

**The Welsh Government is of the opinion that the Swansea Council Replacement Local Development Plan (2023-2038) Preferred Strategy is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).**

This conformity statement is based upon the evidence currently available. Welsh Government reserves its formal position until the full suite of policies, proposals and finalised evidence base is available to scrutinise at Deposit Stage. The Welsh Government supports the Swansea Bay City Deal, but it is currently unclear how the wider region, particularly Neath Port Talbot and adjoining Local Authorities, for example Carmarthenshire County Council, have been involved in shaping the scale and spatial choices made in the plan. Further evidence is required to demonstrate how regional/cross regional collaboration has influenced the scale of growth in Swansea and the relationship to all adjoining authorities.

### **Reasons**

Future Wales places emphasis on the development of National Growth Areas in a sustainable manner. Growth areas must be sustainably planned, reduce the need to travel by car, encourage walking and cycling (active travel), maximise public transport usage and incorporate green infrastructure. Growth areas must embed these principles within a wider regional consensus, focussing on the opportunities they bring to promote social and economic benefits across a broader geographical area. The Welsh Government supports sustainable growth in National Growth Areas to respond to the climate and biodiversity emergencies and make the best use of our resources.

Policy 1 and Policy 28 of Future Wales state that a national growth area centred around Swansea Bay and Llanelli (including Neath and Port Talbot) will be the main focus for growth and investment in the region, strategic diagram (p146). The Swansea Bay and Llanelli National Growth Area Definition Report Research (January 2023) supported by the Regional Collaboration Paper (December 2024) is welcomed as they seek to cover issues that would inform the spatial definition of the National Growth Area which Swansea is within. However, continued/further detail on how adjoining Local Authorities, for example Neath Port Talbot and Carmarthenshire, with regard to their LDP Preferred Strategy and Deposit plan have shaped the scale and spatial choices made in Swansea's emerging LDP would be beneficial as the plan progresses through the statutory process.

**Annex 2** explains our comments in respect of the scale and location of growth. On balance, (and subject to the comments in Annex 2), the Welsh Government considers that the Preferred Strategy, including the scale and distribution of growth, is in general conformity with key policies in Future Wales namely (not exhaustive):

Policy 1: Where will Wales grow

Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking

Policy 6: Town Centre First

Policy 18: Renewable and Low Carbon Energy Developments of National Significance

Policy 28: National Growth Area – Swansea Bay and Llanelli

Policy 31: South-West Metro

Moving forward to Deposit, continued work would be beneficial to understand how the Preferred Strategy has been developed within the wider regional context as **Future Wales brings a new perspective that all LDPs have to embrace on how each plan sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships in advance of the formal commencement of an SDP.**

## Annex 2 – Core matters that need to be addressed (PPW and the DPM)

### **Spatial Strategy - Location of Growth**

The Council has tested 5 spatial options (Options for Growth and Spatial Approaches - December 2024, paragraph 4.9):

- Option 1 – Urban/Brownfield
- Option 2 - Strategic Placemaking
- Option 3 - Dispersal
- Option 4 - Highly Connected Communities
- Option 5 - Housing Need Clustering

The Council recognises that Swansea's LDP is primarily based around a single large urban area, the urban form of the city with several settlements adjoining. The Council also undertook a settlement analysis (Settlement Assessment' (December 2024) to consider the role and function of settlements based on their services/facilities and functionality to adjoining settlements. The outcome of this analysis is set out in Table 2 of the analysis, breaking the settlements into 4 Tiers. This was then further combined with a recognition that the main urban area of Swansea had a variety of different characteristics and issues which would have an impact on the future spatial development and scale of growth across the city. This resulted in the identification of 7 Strategic Housing Policy Zones (SHPZs). These are then further broken down to electoral wards (Figure 3 and Table 1). **The Welsh Government does not object to the Settlement Analysis in principle**, albeit it will be for the Council to justify any scorings/weightings attached to the determination of the outcomes. **The Welsh Government does not object to the spatial strategy set out in the plan.**

The Welsh Government welcomes the recognition that the urban area of Swansea does not follow a uniform range of issues. This seems a logical and rational approach, evidenced through the Options for Growth and Spatial Approaches paper (December 2024). It is important that LDPs reflect the variety of issues identified which should have a bearing on the scale and spatial locations for future growth, across all uses. The Welsh Government also notes how existing key allocations in the adopted LDP have influenced future growth locations (The adopted LDP refers to these as Strategic Development Areas – SDAs, now referred to as Strategic Placemaking Regeneration Areas – SPRAs). Furthermore, the Council has reconsidered the delivery of SPRAs to ensure previous initial under-delivery, due to the scale of growth and complexity of issues to be resolved, are now accommodated in a revised housing trajectory.

With regard to allocations and candidate sites and impacts to BMV whilst they are unclear at present, it is the **Welsh Government's view that the Authority has so far demonstrated a sensible and pragmatic approach to considering BMV loss** in the context of national planning policy. On that basis **no objection** is offered at this stage. The Welsh Government reserves the right to amend this view at Deposit stage if unjustified losses of BMV are proposed.

The Welsh Government considers the strategy encompasses the most significant and most sustainable settlements in the national growth area and that focussing development here will reduce the need to travel and will co-locate housing with employment opportunities, services, and community facilities. This should optimise the opportunity to minimise private car use whilst maximising public transport and active travel opportunities.

**The Welsh Government supports the spatial strategy, which accords with Planning Policy Wales (PPW) and is in general conformity with Future Wales, subject to further BMV evidence.**

### **The Level of Growth - Homes and Jobs**

The Preferred Strategy (Policy SP1) makes provision for 11,410 homes to deliver a housing requirement of 9,510 new homes (634 p/a) over the plan period 2023-2038, of which a target of 5,355 homes will be affordable. The flexibility allowance proposed by the Council is 20% (previously 15% in the adopted LDP). The target for new jobs is up to 10,238 over the plan period. To note, the adopted plan has a requirement of 13,600 dwellings and a provision of 15,600. The replacement plan is a reduction of 4,090 dwellings on the requirement (approx. 30%).

Not every site with planning permission is developed or developed in full, and as a result not all dwellings permitted become new housing completions. To account for this a 20 – 25% non-delivery allowance has been applied to SDA allocations, non-allocated sites and sites with planning consent/s106 agreements. With regards to windfall sites, large sites have been averaged across a 12 year period, with small sites over a 5 year average. Both have been subject to a 30% discount for non-delivery. In accordance with the calculation used to determine the windfall allowance large site windfalls have been excluded from the first two years of the projected supply calculations to prevent double counting. Analysis of Housing Supply Background Paper (December 2024). **Both align with the Development Plans Manual (Edition 3).**

**Homes:** The 2018 WG Principal projections are the latest projections for this Preferred Strategy. **Any future population and household projections based on the latest 2021 Census will need to be considered by the Council if they are published before the plan is examined.** The 2018 principal projection would result in a requirement of 634 units p/a or 9,510 units over the plan period (using a 10% vacancy rate). The level of housing growth proposed in the plan matches the WG 2018 principal projection.

The demographic evidence, (Economic and Housing Growth Assessment, December 2024) tested 8 growth scenarios comprising: demographic-led, dwelling-led, and employment-led scenarios. The preferred housing requirement is the Higher Economic Growth scenario (634 dpa). This scenario includes positive adjustments based on local knowledge of the latest economic impact forecasts for pipeline projects regarded as having a realistic level of certainty of coming to fruition, while also balancing this optimism with wider uncertainty and risks. The Council considers that this level of housing growth is deliverable providing for a forecast increase of 10,238 jobs. Moreover, the scale of growth is considered by the Council to be compatible with the role the authority plays within the wider West Wales, specifically the National Growth Areas set out in Future Wales and the ambition of the Swansea City Growth Deal.

The **Welsh Government does not object to the level of housing proposed in the plan but demonstrating delivery of sites will be essential moving forward to Deposit stage** as required by Planning Policy Wales, Future Wales, and the Development Plan Manual.

**Jobs:** The Council's Higher Economic Growth option results in a target of 10,238 new jobs (682 p/a) over the plan period. This equates to a total of 25ha of land over the plan period. The SQW background paper (paragraph 25) indicates that between 11 – 25.2 Ha of employment land may be needed, broken down into Class B1 8.9 – 21.4Ha, Class B2 1.9Ha and Class B8 0.6 – 4.5Ha (Paragraph 26, SQW). It should be noted that the Class B1 could vary depending on densities. Having reviewed recent economic performance, SQW have proceeded to consider the potential for further economic growth in Swansea over the emerging plan period (2023-38). Reference is initially made to a baseline scenario from Cambridge Econometrics, in which 525 jobs per annum could be created. Consideration is then given to current available information of emerging investments, and stated ambitions, which SQW believe have the potential to generate additional jobs beyond this baseline. They estimate that circa 683 jobs could be created annually in such an investment-led growth scenario. (Paragraphs 9.22 & 9.23).

**The Welsh Government has no significant concerns on the level of job growth/land proposed in the plan.**

### **Affordable Housing Provision**

The draft LHMA (2023) identifies that for the period 2023-2038, there is a need for 5,355 new affordable homes, 357 homes per annum (Policy SP3). Clarity on the status of the draft LHMA would be beneficial. It should be noted that the plan currently lacks the evidence to demonstrate how it will meet this need, rather than state “*The Plan will maximise the contribution towards meeting this need through the following measures: (Policy SP3)*” This needs to be rectified by Deposit stage. The split of affordable comprises:

- 82% of social rented accommodation.
- 18% of intermediate rented housing.

Policy SP3 seeks to optimise the delivery of 5,355 affordable homes. Detailed policies and proposals will be provided in the Deposit Plan setting out thresholds, targets and site allocations and will be based on the outcome of the emerging evidence on development viability work. **This will be essential.** To contribute to the Affordable Homes target, affordable housing led sites will be included within the Replacement LDP. Affordable housing led sites are defined as those where at least 50% of homes on a site are affordable.

**On this basis, the Welsh Government reserves the right to comment in further detail at the deposit stage.**

**Affordable Housing Led Sites** - To deliver additional affordable housing above which market led housing can provide, the authority proposes (in Policy SP3 iii) to permit small scale affordable housing-led developments that provide a minimum of 50% affordable housing on sites. **The principle of this approach is supported.** These sites must be in addition to the market housing led requirement and identified in the LDP. This policy approach is justified by the high level of affordable housing need evidence by the draft LHMA and must be accompanied by additional control over the land by the local planning authority to ensure effective delivery. Evidence should include ownership of the land, a binding legal agreement where the land is in private ownership or a resolution of the council to use compulsory purchase powers. At present the plan is unclear where sites will be located within or on the edge of settlement boundaries. In addition, the scale and location of these sites is unclear, no spatial locations or dwelling numbers are attributed to them.

Affordable housing led sites that have a market element to them must be located within a settlement boundary in order to comply with the requirements in TAN 2. Only 100% affordable housing exception sites can be located outside a settlement boundary where they comply with PPW/TAN and any threshold/policy requirements set in the development plan. **Paragraph 8.33 of the plan refers to 100% affordable housing sites coming forward through a policy framework, this will need to be set out in the Deposit plan.**

### **Employment Land**

The LDP Policy SP1 and paragraph 7.19 identifies a requirement for 25ha of employment land. The Plan considers employment land needs strategically and is founded on a comprehensive review of economic circumstances and investment targets (Economic and Housing Growth Assessment (Turley, SQW & Edge Analytics, July 2024). The assessment includes:

- A consideration of strategic functional housing and economic relationships impacting Swansea. This includes a consideration of the geographical extent of functional economic market areas, with more localised housing market areas separately defined in the Council's Local Housing Market Assessment (LHMA)
- An up-to-date baseline analysis of demographic, housing and economic datasets as well as review of commercial market evidence
- The development of forecast scenarios of reasonable employment growth accounting for current economic conditions and identified planned and potential investment
- A calculation of the amount and make-up of employment land that could be required to accommodate business investment and forecast employment growth

- An assessment of future household growth and levels of housing need accounting for demographic trends and the scale of labour force change required to support the presented forecasts of job growth.

An Employment Land Review has also been undertaken (LDP, Appendix A) as part of the evidence base. The review has highlighted that the identified need in terms of land for B Class employment uses is available within existing business parks and/or employment sites, and Strategic Placemaking and Regeneration Areas. Based on 10,238 net new jobs over the Plan period a requirement for 25 Ha of employment land (Use Class B1- B8 space) would support the adopted economic growth forecast and replace all losses of B use land that might occur over the Plan period (following consideration of past trends of site redevelopments and changes from B use).

Reflecting on the evidence, **the Welsh Government does not object to the provision of employment land in the plan.**

### **Delivery and Implementation**

In line with key requirements in Planning Policy Wales, the Development Plans Manual (Chapter 5) also contains guidance on the requirements in respect of the delivery and implementation of plans. The Deposit Plan should set out site-specific details for significant sites for the plan that include general phasing timescales, key infrastructure requirements, placemaking principles (including concept / schematic masterplans), constraints, and developer requirements, where appropriate.

The Council will also need to demonstrate that strategic sites and all other housing components are deliverable through a housing trajectory prepared by the Council and Housing Stakeholder Group. Statements of Common Ground for significant allocations, especially those that have 'rolled over' from the adopted plan, would be advantageous to demonstrate the sites are deliverable in the timescales set out. **A Housing Trajectory needs to be prepared by Deposit stage.**

The Welsh Government notes that a Preliminary Report on a High-Level Plan-Wide Viability Assessment (Burrows-Hutchinson Ltd, December 2024) has been undertaken. These preliminary findings which have influenced the Preferred Strategy need to be refined further to ensure all development can be evidenced, for example, affordable housing thresholds, all financial components of development have been considered and can be scrutinised.

**The Deposit plan will need to be supported by a high-level affordable housing study and site-specific viability appraisals for significant sites, where appropriate. All viability work must be prepared in conjunction with the Viability Steering Group and site-specific promoters taking into account relevant infrastructure requirements.**

### **Gypsy and Travellers**

The Swansea GTAA (2022) established a need in the LDP area (Table 5, LDP) as follows:

- 24 pitches as an immediate need
- 8 pitches over a 5-year need
- 5 pitches over the remainder of the plan period
- A total of 37 pitches over the plan period.

Travelling showpeople additional needs were identified as 9 pitches over the plan period which the plan states can be accommodated at an existing site at Railway Terrace which has a lawful use. Therefore, there is no necessity to identify addition sites in the plan.

The GTAA identified 0 Transit pitches, so no sites are necessary.

The LDP states (paragraph 8.39) “The need for pitches to accommodate the identified Gypsy/Traveller needs will be met through the provision of additional pitches on sites that have relevant planning consents and/or appropriate lawful use for such development at Tygwyn/Pant y Blawdd Road and Millstream Way in Swansea Vale.” **The Deposit plan and supporting evidence need to demonstrate this can be achieved, meets its statutory duty and comply with requirements in Planning Policy Wales (4.2.35), Circular 005/2018 (paragraph 35) and the Development Plans Manual (5.80-5.85) to allocate sufficient and deliverable sites in the plan for unmet gypsy and traveller need.** The Council will also need to ensure that any sites are supported by a transparent and robust site selection process that aligns with the requirements of Circular 005/2018 and any relevant guidance. The views of the relevant statutory bodies must also be agreed before Deposit stage with no outstanding objections to the delivery of the sites.

### **Renewable Energy**

The Welsh Government notes the Swansea Local Area Energy Plan (LAEP) May 2024, the South-West Wales Regional Energy Strategy (2022) and a Stage 1 Renewable Energy Assessment (REA) have been undertaken.

Future Wales identifies Pre-Assessed Areas for Wind Energy where the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. There is a presumption in favour of large-scale wind energy development (including repowering) in these areas, subject to the criteria in policy 18. Where those developments are >10Mw they will be considered by Ministers in accordance with the policies in Future Wales.

The Welsh Government notes that further technical work will be progressed. **It will be necessary that technical work is completed by Deposit stage to ensure matters relating to climate change, maximising renewable energy contributions and a clear policy framework is in place to consider planning applications.** Pre-assessed area (9) should also be reflected in the plan via policy SP15.

### **Flood Risk**

The Welsh Government notes that a South-West Wales Stage 1 Strategic Flood Consequence Assessment (SFCA) (2022) has been undertaken to inform the plan and suitability of proposed sites to be included. Paragraph 8.189 of the plan states:

*“Ahead of the preparation of the Deposit Plan, the Council will continue to monitor the position in respect of any new Technical Advice Note (TAN) 15 and the Flood Map for Planning being issued by the Welsh Government.”*

**It is imperative that the Council clearly demonstrate that all elements of the plan, the strategy, SPRAs and individual sites reflect the revised TAN15 (published 31/03/25).** The Flood Maps for Planning has replaced the previous DAM maps with updated modelling and technical parameters.

The Welsh Government considers there may be some partial areas of the strategic sites that could be affected. If that is the case the Council needs to demonstrate there is sufficient land remaining to deliver the scale and range of uses anticipated. However, clarification of how the City Centre and Waterfront could be affected needs to be articulated and evidenced. Furthermore, an explanation of how the revised TAN15 potentially impacts on brownfield sites and capacity assumptions would be beneficial to maintain the ability to meet the housing requirement. This should identify any additional requirements for flood defences/funding in the Infrastructure Plan accompanying the LDP.

### **Minerals**

The South Wales Regional Technical Statement (RTS 2<sup>nd</sup> Review 2020) identifies a nil apportionment for land-won sand and gravel provision in the Swansea, but a requirement of



0.305mt/year for crushed rock up to 2041, a total of 7.636mt. At present, whilst there is a resource to meet this need it is entirely within the Gower AONB, to which it would be inappropriate to extract. It would therefore rely on either Neath Port Talbot and/or Carmarthenshire filling this shortfall. The background paper (02/03/21) states:

*“At present Swansea is unable to demonstrate that is the case and the appropriate test for that will be the LDP review due to commence from September 2022 and be completed by late 2025/early 2026. There are more than sufficient reserves within NPT to take up the joint apportionment within this period without resulting in under provision and moving away from the overall 25-year apportionment for NPT. It is envisaged that NPT would take on the majority of the supply in the first part of the 25-year period of RTS2 and Swansea will seek to take on the supply load for the second part of the 25-year period of the RTS2 following the LDP Review. In addition, Policy RP12 of the Swansea Local Development Plan allows mineral development to be permitted subject to a number of criteria being satisfied. Therefore, the LPA’s within the Swansea City Region agree to accept their apportionments as set out in the RTS2.”*

By Deposit stage, the plan should be supported by a Statement of Sub-Regional Collaboration with adjoining authorities in the South Wales Swansea sub-region to confirm how any shortfall will be met across the region, particularly for crushed rock, of which Swansea has a deficit.

### **BMV Agricultural Land**

The Welsh Government has not been able to consider how the evidence to the Preferred Strategy in respect of Best and Most Versatile (BMV) agricultural land and how this has impacted on sites, or the scale of growth, as no sites are identified nor is there a background paper on BMV land. **The Council need to resolve this position by the deposit stage, in line with PPW.**

Renewable Energy – Strategic Policy SP25 – It is unclear how the plan policy for renewable energy projects and search areas addresses BMV agricultural land policy as well as high carbon soils (e.g. Peatlands).<sup>[2]</sup> **It is therefore unclear how the plan conforms with Policies 9 and 17 of Future Wales and PPW at this point in time which needs addressing.**

Green infrastructure assessment – Peatlands are considered within Strategic Policy – Natural Environment (Section 5.1). The policy refers to adverse impacts on the ‘quality’ of peat. PPW does not consider peat ‘quality’, but that considerable weight should be given to protection of the peat resource *in-situ* (PPW para 6.4.34) and that development on irreplaceable peatland habitats would only be permitted in wholly exceptional circumstances and should be avoided (PPW 6.4.15, 1a/1b).

The Authority has demonstrated that the BMV Policy has been considered from the outset and throughout the process of developing the Preferred Strategy through the Vision, Objectives and Options background Paper. As a brief summary, BMV Policy is considered in the Preferred Strategy through a key issue is to minimize the loss of such land to development (Key Issue 11 and Objective 8 - Sustainable Development) and the Candidate Site Assessment - the LPA has produced an on-line interactive constraints map for candidate site promoters including BMV (from the predictive map) and Peatlands (from the Peatlands of Wales maps). Agricultural land quality is highlighted in the stage 1 assessment with further consideration under stage 2a.

We would like to highlight that where a candidate site is identified as BMV on the Predictive ALC map, as per published WG guidance, a detailed ALC field survey should be undertaken for the assessment. This requirement must be included in the guidance for candidate site promoters. The WG is available to advise on survey requirements and validate ALC surveys submitted. The WG has published information on ALC surveys held on DataMap Wales with reports available on request. The WG appreciates that the candidate site assessment process has not been completed (Stage 2) and would welcome further engagement with the LPA on sites involving BMV.

The Preferred Strategy Strategic policies identifies the importance of protecting and enhancing carbon rich soils (SP15 and SP17), and unjustified loss of BMV with links to food security as well as lowering the carbon footprint associated with food production (SP13 and 15). The WG is unclear if BMV policy is highlighted clearly enough, best placed and carries weight as they are set out in policies SP13 and 15 – BMV policy may be more appropriately covered in SP8 also (Strategic Placemaking)?

It is requested that BMV Policy application is covered in the RLDP by a specific topic paper at deposit, demonstrating how the policy has been considered, evidenced and delivered throughout the plan. To meet the requirements of PPW Paragraph 3.58 and 3.59 and Policy 9 of Future Wales, the WG expects the Policy to be taken into account at the earliest point in the process and throughout. The WG also expects that BMV policy application is sufficiently evidenced and justified in the plan, sustainability appraisal, spatial strategy and site selection process. It is expected plans should clearly demonstrate the evidence sources used, the weight given to BMV land, and how BMV policy has been applied in the spatial strategy, allocations and site selection process.

In conclusion, although allocations and candidate site's and impacts to BMV are unclear at present, it is the WG view that the Authority has so far demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy. On that basis **no objection** is offered at this stage. The WG reserves the right to amend this view at Deposit Stage if unjustified losses of BMV are proposed.

### **ISA and Evidence Base**

The ISA has considered BMV policy and peatlands through; i) Baseline data (Predictive ALC map and Peatlands of Wales maps), ii) ISA objective and indicator to minimise BMV and soil loss, iii) impacts to BMV and soils of alternative growth scenarios and appropriate weight give in the assessment, iv) assessment of the preferred strategy against BMV loss.

The ISA highlights the WG position on solar PV developments and BMV agricultural land (DCPO letter of 1 March 2022). We would also wish to highlight policies regarding protection of peat soils and irreplaceable peatland habitat in developments (PPW, Chapter 6, paragraph 6.4.15 1a and 1b 'stepwise approach' and paragraph 6.4.34), especially for site selection choices and infrastructure placement options.

### **Transport**

Transport solutions for new developments should focus on providing measures to maximise modal shift and minimise the need for any additional vehicular use of the highway network. Proposed sites should define each measure and undertake an assessment of the percentage shift that each will generate. Once maximum modal shift has been achieved, sites will be required to undertake an assessment of any residual increase in traffic. Should this assessment indicate that the development will still have a detrimental impact on the highway network, the site will be required to identify measures and propose highway improvements sufficient to mitigate against the impact of the additional development-generated vehicles only. It's crucial to avoid large-scale highway improvements that could inadvertently encourage increased car usage and instead focus on sustainable transportation options.

Developments should utilise existing access onto the Trunk Road Network wherever possible as there is a presumption against new access.

### **Welsh Language**

Assessing the impacts on issues such as the Welsh language, should be fully aligned with the development of the plan/strategy early in the plan making process. WG note that further policies will be include in the deposit plan and reserve the right to comment more fully at a later stage.

Policy SP7, paragraph 8.74 states:

*“The production of the Deposit Plan can allow for the delineation of an area of linguistic sensitivity on the Proposals Map.”*

Paragraph 8.75 states:

*“The Deposit Plan can also set out any specific policy requirements that can elaborate upon the content of Strategic Policy 7, including any requirement for assessment of applications for linguistic impact – taking into account the provisions of national policy.”*

The Welsh Government consider such intentions need to be specified in the Deposit plan, where appropriate.

The authority can make contract with the local Welsh Language Initiative ([Menter Iaith y Fro](#)) for further help and support.