
Ref: TP0001
Respondent: Mr Nick Turner
Organisation:
Discussion Paper Section: Spatial Options & Settlement Hierarchy
Para No: General
Summary:

- Support is given to options 3, 4 and 5. However, the respondent would like to see a preference in hierarchy to those ones with existing utilities, as this will cause less disruption and be more environmentally friendly.
- Transport links - much of Carmarthenshire has a good transport network.
- The respondent seeks the treatment of small and large sites with equal importance.

Ref: TP0002
Respondent: Ms Jillianne Cross
Organisation: Jacobs
Discussion Paper Section: Site Assessment Methodology
Para No: n/a
Summary:

1 - Phase 1 - Stage C

- Landscape - recommend inclusion of landscape designations as a filter for strategic sites.
- Habitats Regs- need to fit into this filtering process.
- Flooding- Consider undertaking a SFCA.
- Alternative Energy- consideration given in the site deliverability/infrastructure question of the site's potential for being supplied by alternative energy generation/microgeneration or CHP.

2 - Phase 3 - Stage C

- Some of the SA objectives and decision making criteria lend themselves better to looking at strategic options/policies than individual sites. Consider to use only relevant objectives.
- It would be useful to capture information collected during earlier phases of the assessment in some way for those sites taken forwards to the further analysis stage (Phase 1 Stage C).
- An example of capturing the information was attached .
- Include in the comments box for Phase 3 of the assessment a brief note as to the likelihood of being able to mitigate for any negative interactions.
- Scoring- keep as simple as possible and for example allocate a -1 for a negative interaction with a SA objective and a +1 for a positive interaction.
- Consider linking the results of the biodiversity settlement study to the site allocations.

Ref: TP0003
Respondent: Mr Simon Avery
Organisation: Bell Cornwell
Discussion Paper Section: Spatial Options and Settlement Hierarchy
Para No: Option 1
Summary: The respondent supports the Settlement Hierarchy Option.

Ref: TP0004
Respondent: Mr Simon Avery
Organisation: Bell Cornwell
Discussion Paper Section: Issues, Vision and Objectives
Para No: Option 1
Summary: The respondent supports the Strategic Objectives set out in the Issues, Visions and Objectives Paper.

Ref: TP0005
Respondent: Miss R Bust
Organisation: The Coal Authority
Discussion Paper Section: Issues, Vision and Objectives
Para No: Objective SO2
Summary: The respondent considers that objective SO2 should be reworded to ensure that it address land stability issues: "SO2 To ensure that the principles of sustainability are upheld by (a) encouraging new development on suitably remediated previously developed land and..."

Ref: TP0006
Respondent: Miss R Bust
Organisation: The Coal Authority
Discussion Paper Section: Issues, Vision and Objectives
Para No: Objective SO5
Summary: The respondent considers that objective SO5 should be reworded to address the issue of mineral safeguarding as follows: "SO5 To assist with tackling the cause and affect of waste, climate change and pollution through promoting recycling, renewable energy, green innovation and the effective use and safeguarding of resources."

Ref: TP0007
Respondent: Miss R Bust
Organisation: The Coal Authority
Discussion Paper Section: Site Assessment Methodology
Para No: Site Sieving Process
Summary: In terms of eventual site allocations, it would be prudent to include a criterion which assessed the coal mining data. The respondent would not wish to suggest that any of the potential sites should be excluded from the assessment on the grounds of former mining legacy issues, but appropriate remediation must be ensured as part of the development process.

Ref: TP0008
Respondent: Miss R Bust
Organisation: The Coal Authority
Discussion Paper Section: Spatial Options and Settlement Hierarchy
Para No: Settlement Hierarchy

Summary: Of the Tier 1 settlements where major development will be targeted, Llanelli and Ammanford/Cross Hands sit on the surface coal resource and therefore depending upon the scale and nature of development it may be necessary to consider prior extraction of coal resources ahead of development in these areas. Similar considerations may also apply in settlements in Tiers 2, 3 & 4

Ref: TP0009

Respondent: Mr J D Evans

Organisation: J Evans Planning Limited

Discussion Paper Section: Population and Housing

Para No: general

Summary:

- page 3- does the housing requirement figure take into account the shortfall in expected provision of housing from UDP allocated housing sites in GR3 to date?
- The assessment at section 6.4 is based only on population growth and makes the assumption that the UDP allocations have or will meet demand. There has been a clear shortfall in the provision and delivery of new dwellings in GR3. These shortfalls should be acknowledged and taken into consideration in the LDP.

Ref: TP0010

Respondent: Kerry Turner

Organisation:

Discussion Paper Section: General

Para No: general

Summary: The respondent seeks the LDP to look at second home ownership as well as affordable housing. More second home accommodation (including lodges and caravan sites) should be made available to reduce the need for people to buy large second homes.

Minor link roads should be constructed onto main artery roads rather than developments being constructed direct onto artery roads.

Ref: TP0011

Respondent: Mr Del Phillips

Organisation:

Discussion Paper Section: General

Para No: general

Summary:

The respondent is concerned about the objectives set out in the topic papers:

- It appears that the main areas for development have already been determined.
- A full study of Environmental Impacts does not seem to have been conducted prior to establishing the wider intentions of the LDP.
- If an SEA had been conducted before the adoption of the UDP then all environmental issues would have received appropriate attention.
- The fact that only a very small percentage of effluent is treated properly prior to discharge into 'protected' waters is entirely unlawful. No infrastructure = No development!
- Issues have been considered on a site by site basis and, i.e. no consideration given to the scale of environmental effects in combination with other developments.
- The respondent believes that the SEA & EIA regulations have not been met.
- The respondent states that the intention to carry out SEA on individual sites, after selection, is flawed, the SEA should have guided the authority in it's overall proposals.
- Most of the candidate sites are currently greenfield sites. Many other candidate sites are described as 'vacant' land, which in many instances are greenfield sites.
- By asking the public to nominate 'candidate sites' it appears that the Forward Planning Dept. has given hope to landowners.
- The Prime Minister has stated, "It is not the policy of this government to build on greenfield land. It is the policy of this government to build on brownfield sites."
- PPW states that 'Planning policies and proposals should: Promote resource-efficient settlement patterns that minimise land-take (and especially extensions to the area of impermeable surfaces) and urban sprawl, especially through preference for the re-use of suitable previously developed land and buildings, wherever possible avoiding development on greenfield sites.
- CCC's policy is the same as WAGs and few candidate sites have been submitted by the local authority.
- The UDP's housing allocation up to 2016, was substantially exceeded almost two years ago, it may be possible to comply with the above policy, with very few exceptions.
- The respondent is concerned that brownfield sites in Llanelli have been neglected and that developers prefer to build on greenfield areas.
- The respondent is also concerned about developing on playing fields.
- If the UDP housing allocations has been exceeded already, infrastructure requirements are now the absolute priority.
- Issues of infrastructure should be concentrated on at the current time as opposed to building more housing, which would create jobs and preserve living standards.
- Compliance with European directives is required.

Ref: TP0012

Respondent: Dr L Wilberforce

Organisation: Wildlife Trust of South and West Wales

Discussion Paper Section: Issues and Vision paper

Para No: general

Summary: The respondent supports the vision set out. You have a key role in contributing to the outcomes of the Assembly Government's Environment Strategy for Wales:

19. The loss of biodiversity has been halted and we can see a definite recovery in the number, range and genetic diversity of species, including those species that need very specific conditions to survive.

20. The wider environment is more favourable to biodiversity through appropriate management, reduced habitats fragmentation and increased extent and interconnectivity of habitats.

21. Sites of international, Welsh and local importance are in favourable condition to support the species and habitats for which they have been identified.

The paper as a whole would be improved in the manner in which it addresses issues of wildlife conservation and the protection and enhancement of the natural environment. The natural environment is often given inadequate consideration be virtue of being outcompeted, in a sense, by issues of (also important and commendable) sustainable development. Biodiversity is central to sustainable development. For example, consider the visioning elements highlighted by Stakeholders under the Community Strategy category A Better Place (page 24 of the document)- these are heavily biased towards public green space, parks and the built environment and do not really consider the natural environment and countryside.

The respondent recommends the weighting given to A Good Quality Environment (page 25) but request that the needs of the natural environment and wildlife conservation be given greater consideration within this bracket. As such, we would recommend that Strategic Objectives, SO4 is split into two objectives because (as identified within this paper by stakeholders) these two aspects will on occasions be in conflict within the development of the LDP:

1. To safeguard and enhance the natural environment,
2. To safeguard and enhance the built and historic environment.

Ref: TP0013

Respondent: Dr L Wilberforce

Organisation: Wildlife Trust of South and West Wales

Discussion Paper Section: Site Assessment Paper

Para No: general

Summary:

Re:Phase 1of Site Assessment Paper: B- Strategic objectives and spatial strategy.
The respondent is uncomfortable with the paragraph relating to exceptions "Proposals that might have a positive strategic impact, for example in terms of raising the prosperity of the area through employment and inward investment, should be catered for in exceptional circumstances". It is understood that such proposals should be considered, it should be emphasised that they need to be subject to extremely rigorous EIA and the wording should be 'considered' not 'catered for'. Not least that any damage to a European Natura 2000 site [SAC] which results in infraction proceeding may cost up to £11 million lump sum, with additional £1 million daily costs. And as a local authority you are a Section 28G authority under the Countryside and Rights of Way Act 2000 "Statutory undertakers, etc.: general duty.

The respondent also reminded the Council of their duty under the Natural Environment & Rural Communities Act (2006) and the need to take account of impacts on S42 and Biodiversity Action Plan species.

Although it is appreciated that many of these issues will be assessed at the Phase 3 / development control stage, they should also be considered at a strategic level to reduce cumulative impacts over larger geographical areas and prevent wasted time and money in scheme development and assessment. The respondent commends the council on the presence of Biodiversity as a Sustainability Objective and on the Decision Making Criteria applied in the Phase 3 assessment.

Ref:	TP0014
Respondent:	Lyn Powell
Organisation:	RPS Planning & Development
Discussion Paper Section:	Issues, Vision and Objectives
Para No:	general

Summary:

1. The Summary Vision outlined on page 8 of the Executive Summary is generally supported. The intention to reinforce the County as a county of "contrasts" is to be applauded in order to retain its distinctive existing community and environment. The principle that everyone will have access to good quality employment and a suitable mix of housing is particularly supported. However, it will be a significant test for the LDP to demonstrate how that objective can be delivered.

2. The LDP's Strategic Objectives are as one would expect. However, there are potential stresses within them that can potentially pull against each other. For instance, Objective S02 seeks to encourage new development on previously developed land whilst S03 seeks to make provision for an appropriate mix of quality homes and S04 seeks to ensure that the natural environment is safeguarded and enhanced. Whilst encouraging the maximisation of the use of previously developed land is laudable and to be supported, there is a need for the LDP to recognise that all new development, particularly residential, cannot be expected to be delivered from such land especially if an appropriate mix of quality homes is to be provided. The recent experience in large urban centres and towns of a large concentration of apartments being constructed on brown-field sites at very high density, for which there is now no demand, has shown that it is a flawed strategy to seek to secure all new housing on previously developed urban sites. A range and choice of housing within both inner urban and peripheral semi-rural areas is essential to provide a balanced community and particularly one that can grow or expand with, and within, that community.

3. The LDP must therefore recognise that green-field sites have a very important role to play in contributing towards the provision of balanced and sustainable growth and that sustainable communities derive from well-planned settlements that are of a sufficient scale to not only provide the necessary range of community and employment opportunities but also, in particular, to be capable of funding the very significant infrastructure costs that are required through section 106 and other agreements. If the LDP does not properly recognise that situation its strategy may well be concluded to be unsound.

Ref: TP0015
Respondent: Lyn Powell
Organisation: RPS Planning & Development
Discussion Paper Section: Population and Housing
Para No: general

Summary:

1. It is to be welcomed that the WAG projection, based on the 2006 figures, are to be used to predict the County's housing requirement.
2. It is also to be welcomed that a range for the household requirements is to be used, therefore allowing a 10% flexibility for both the distribution of developments to and within settlements and for estimating the capacities of individual sites.
3. A housing requirement of between 12,735 and 14,075 is therefore accepted, provided no fundamental flaw in the methodology adopted to calculate it is identified during the remainder of the LDP process by HBF and others. Likewise an urban density average of 30 dph is accepted as reasonable, provided a range and choice of housing density is allowed which reflects market demand for particular areas and particular circumstances.

Ref: TP0016
Respondent: Lyn Powell
Organisation: RPS Planning & Development
Discussion Paper Section: Settlement Hierarchy
Para No: general
Summary:

1. The promotion of Strategic Spatial Option 1 as the preferred option, and the basis for the proposed settlement hierarchy, is supported provided it recognises the benefits and clear advantages of urban growth (option 2) as one of its primary key features.
2. The identification of Carmarthen, Llanelli and Ammanford/Cross Hands (including the villages contained therein as listed on page 39) as the principal centres of population, and therefore as "Tier 1 Settlements", is supported as is the intention that they should accommodate a "proportionally high level of growth" (page 40).

Ref: TP0017
Respondent: Lyn Powell
Organisation: RPS Planning & Development
Discussion Paper Section: Site Assessment Methodology
Para No: general
Summary:

1. The three phases identified for site assessment are broadly accepted although clearer guidance is sought on the specific scale and characteristic of size, location and proposed use that will make a site "strategic" in LDP terms.
2. Presumably in the context of the proposed "sieving process" the elimination of sites from the next stage will only happen when sites are both outside UDP development limits AND they are divorced from and unrelated to any existing settlement? This needs to be clarified as the intentions of the process as described in the second paragraph on page 3 of the paper are unclear. If it is the intention that all sites outside UDP development boundaries are excluded then this letter forms an objection to that intention.

Ref: TP0018
Respondent: Bethan Thomas
Organisation: Npower renewables
Discussion Paper Section: Issues, Visions and Objectives
Para No: general

Summary:

The respondent has provided some general comments on the consultation document:

Page 5: The respondent is encouraged to see that three of the ten main headline issues to emerge from the discussion papers include i) sustainable development, ii) climate change and iii) infrastructure. It is hoped that the LDP will seek to deliver these issues through implemented development schemes

Page 10: Table 2 – The LDP Strategic Objectives: The inclusion of Strategic Objective SO5 is welcomed and, although the objectives are specifically not weighted, it is considered that SO5 should be considered as one the most important objectives for the LDP. In light of its importance however, the use of the words “assist” and “promote” are not purposeful enough to ensure that the objective is delivered. It is therefore suggested that SO5 should be amended to read;

“To make a significant contribution to tackling the cause and affect of waste, climate change and pollution through delivering an increased provision of recycling, renewable energy, green innovation and the effective use of resources”

Page 20: The key sustainability issues and challenges for Carmarthenshire - Issue S4 deals with ‘Climatic factors’, however does not make any reference to the delivery of renewable energy infrastructure. As the delivery of renewable energy infrastructure is a key government priority (as prescribed within TAN8) the delivery of such infrastructure should be specifically stated within this key issue. Its inclusion will also clarify a means of delivering the LDP ‘key’ issues and Strategic Objective SO5.

Page 27/8-National Planning Policies and Issues-This section does not include any reference to TAN8 or MIPPs 01/2005, despite these being key government policy documents that will inform the delivery of the ‘Key’ objectives of the LDP. It is contended that these policy documents should be included within this section.

Page 28: Planning Policy Wales - Item (b) provides commentary on ‘Climate Change’, but fails to mention the importance of delivery renewable energy delivery. It is considered that this is a significant oversight and, again, reference to renewable energy infrastructure should be referred to in this section.

Page 29:Local Policies and Issues - This section, and the referenced SA scoping document, make no reference to the Supplementary Planning Guidance for Major Wind Farm Development (July 2008), a key guidance document relating to the delivery of major wind farm schemes within the Brechfa Forest area. Given the importance assigned to sustainability issues, and the role that renewable energy can play in delivering sustainability and climate change objectives, NRL considers that this document should be referenced.

Page 60:Synopsis of Key plan issues to emerge from the Discussion papers and the subsequent consultation undertaken in relation thereto - The synopsis of ‘the Sustainable Energy’ topic is that “Carmarthenshire is well-placed to make use of renewable energy. Whilst this is not contended, NRL consider that Carmarthenshire has an actual ability to deliver ‘sustainable energy’, not simply be ‘well-placed’. This stronger emphasis is made as a direct response to not just local, but the national and international policy imperative to combat climate change.

Ref:	TP0019
Respondent:	Mr C E Lambart
Organisation:	The National Trust
Discussion Paper Section:	Issues, Vision and Objectives
Para No:	general

Summary:

Tackling causes and effects of climate change is addressed in SO5 and recognised as a driver of the plan in section 3.4. It is evident from the paper as a whole that climate change is regarded as a fundamental underlying issue and the National Trust very much supports this stance.

Section 5.7 identifies potential incompatibility between objective SO5 and the landscape and historic environment. Although not disagreeing with the concerns identified, the respondent would like to point to their experience in delivering renewable energy projects in sensitive environments and reconciling the challenge of reducing greenhouse gas emissions while safeguarding the environment from other forms of damage.

The Trust's experience is that capital expenditure on direct production/capture of thermal energy can be more cost effective than meeting the same energy requirement through electrical generation, allowing a greater saving of carbon dioxide emissions, and that these sorts of technology can often be sympathetically installed in sensitive locations.

The National Trust welcomes the recognition of the historic environment in objective SO4. Historic parks are acknowledged as an important part of the historic environment in chapter 6 of Planning Policy Wales and we would welcome explicit recognition of the significance of historic parks and gardens as an element of the historic environment within the scope of objective SO4. Our principal concern is with the registered historic park of Dinefwr on the edge of Llandeilo, whose setting is potentially affected not just by bypass proposals but also by candidate sites that have been proposed to the council.

Ref:

TP0020

Respondent:

Mr C E Lambart

Organisation:

The National Trust

Discussion Paper Section:

Site Assessment Methodology

Para No:

n/a

Summary:

In phase 3 of the site assessment methodology, testing of impacts on the historic environment is stated as being undertaken in relation to historic landscapes, listed buildings and archaeological sites. Historic parks are acknowledged as an important part of the historic environment in chapter 6 of Planning Policy Wales, which states that parks and their settings should be protected. In order to be consistent with this national policy, impacts on historic parks and gardens included in part 1 of the Cadw/CCW/ICOMOS "Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales" should also be assessed. Dinefwr is included in the register.

Ref:

TP0021

Respondent:

Mr F Hughes

Organisation:

Llanelli Civic Society

Discussion Paper Section:

Issues, Vision and Objectives Paper

Para No:

n/a

Summary:

Whilst the key issue of the distinctiveness of the County is identified in table 3, this is not carried through adequately in the key sustainability issues and challenges table on pages 21-23. The loss of key buildings and the protection of important townscapes are not identified. The respondent is concerned that the need to conserve the County's distinctive built environment is not mentioned when this should surely be one of the key objectives of planning control. Later on in the document it has passing references, but it is strange that mention is made of the number of ancient monuments and important landscapes, but not of the number of listed buildings, conservation areas, townscape and buildings of local importance.

Ref: TP0022
Respondent: Mr F Hughes
Organisation: Llanelli Civic Society
Discussion Paper Section: Population and Housing Paper
Para No: n/a
Summary: The respondent questions whether the setting of an average density is appropriate apart from its use to calculate overall land requirements. In such a varied rural and urban County the density of an individual site should be determined solely on the characteristics and capacity of that site.

Ref: TP0023
Respondent: Mr F Hughes
Organisation: Llanelli Civic Society
Discussion Paper Section: Site Assessment Methodology
Para No: n/a
Summary:

- The respondent considers that the criteria proposed for the Phase 1 sites in terms of environmental impact should not just be restricted to European or national ecological designations. The environmental considerations specified for Phase 2 sites are far more wide ranging and more appropriate when considering the Phase 1 strategic sites.
- The Phase 3 assessment criteria do contain references to Cultural Heritage, but the Decision Making Criteria refer to landscape, archaeology and listed buildings, but not to the wider built heritage, existing character or even Conservation Areas. These should all be included in the Phase 1 and 2 assessments.

Ref: TP0024
Respondent: Mr F Hughes
Organisation: Llanelli Civic Society
Discussion Paper Section: Strategic Spatial Options and Settlement Hierarchy
Para No: n/a
Summary: The respondent fully supports the adoption of Option 1.

Ref: TP0025
Respondent: Mr Keith Warren
Organisation: Asbri Planning
Discussion Paper Section: Issues, Vision and Objectives
Para No: n/a
Summary: The respondent supports the vision of the Plan and the Strategic Objectives , particularly SO2, SO3.

The Key Plan Issues are also supported, particularly that relating to achieving a Suitable Mix of Housing where the potential of the strategic objective to deliver the vision and address the key plan issue through detailed LDP policies and allocations.

The respondent believes that the site he submitted as part of the Candidate Site process would be compatible with these objectives.

Ref: TP0026
Respondent: Mr Keith Warren
Organisation: Asbri Planning
Discussion Paper Section: Population and Housing
Para No: n/a
Summary: The Population and Housing Paper sets a target of 13,405 additional households being required up to 2021. The annual requirement of 893 new dwellings per annum will help meet increased demand once the current downturn in the housing market improves. As such the Topic Paper and the above requirement, which also includes a 10% flexibility provision giving a range of 12,735 to 14,075 is supported.

Ref: TP0027
Respondent: Mr Keith Warren
Organisation: Asbri Planning
Discussion Paper Section: Site Assessment Methodology
Para No: n/a
Summary: The respondent believes that the site he submitted as part of the Candidate Site process meets the definition of a Strategic Site, and provides an assessment of the site.

Ref: TP0028
Respondent: Mr Keith Warren
Organisation: Asbri Planning
Discussion Paper Section: Strategic Spatial Options
Para No: n/a
Summary: It is noted in the Topic Paper that Option1 – Sustainable Distribution is the emerging preferred Strategic Spatial Option. Generally the emerging strategy, which would seek to apportion development under a sustainable distribution strategy according to the role and status of the settlement is noted. However there is no indication as yet as to the proportion of the overall housing land requirement to be met in the main towns.

In this context, Option 2 – Urban Growth would seem to be compatible with a sustainable distribution strategy whilst also placing emphasis on consolidating existing urban areas. In the absence of the relative proportions of development to be accommodated in the Tier 1 settlements in either strategy, the respondent objects to the emerging preferred strategy option on the grounds that the Urban Growth Strategy, or at least a hybrid of the Urban Growth and Sustainable Distribution Strategy should be preferred.

Ref: TP0029
Respondent: Ms Louise Edwards
Organisation: Environment Agency Wales
Discussion Paper Section: Issues, Vision and Objectives
Para No: n/a

Carmarthenshire Local Development Plan: Topic Papers Consultation Responses

Summary:

General comments on the document:

Please could you number each paragraph as it makes it easier for us to respond.

Please provide a glossary.

There is a lack of cross referencing.

Within the Issues, Vision and Objectives paper there is a lot of duplication, for example

- page 31 paragraph 3.9 – consolidated summary of the key plan issues & elements of the LDP vision is the same as page 7.

- Page 36 – the visioning ideas/key issues are the same as page 31 & 7

- Page 4 – discussion and identification of the key land use planning and sustainability issues facing Carmarthenshire is repeated on page 14 paragraph 2.1.

Page 8 – The Vision: The vision is not unique to Carmarthenshire, there is nothing that makes it stand out from any other Authority.

Please define “County of Contrasts”.

Page 10 – Strategic Objectives

SO1 – This objective could include “sustainable design”.

SO2(a) – “encourage new development on previously developed land”. We support this objective as it is in line with Planning Policy Wales (PPW)

SO2(b) – please define “sustainable locations”.

SO4 – “ensure the natural environment is safeguarded and enhanced” – could this be expanded to include habitats and species?

SO5 – includes waste, climate change, pollution and effective use of resources, could this objective also include flood risk, water quality and water quantity?

SO11 – includes “soft infrastructural requirements” for business and employment, this should include foul and surface water, not just for business and employment but also for housing.

Page 11, Table 3

SO1 – Only refers to safeguarding not enhancing.

SO5 – mentions flooding, water abstraction and regard to the Regional Waste Plan, should also include water quality and reference to the Water Framework Directive.

Page 20 - Key sustainability issues – SA/SEA: We are happy with the SA/SEA issues for the environment

Page 23 – Key LDP topics/issues: These topic areas are not as environmentally strong as the SA/SEA issues. There is no mention of biodiversity, water quality, foul drainage, surface water disposal.

Page 24: Referring to the 5 pillars of the community strategy appears to confuse things. The LDP process has many different elements to it anyway without trying to fit the LDP issues in the community strategy.

There is also reference to “visioning elements” - again this is confusing.

Page 25 – 14 headline elements: “14 headline elements of vision/key plan issues were agreed” – These key plan issues are different from those given on page 24 (key LDP topics/issues) and it is not clear why.

Page 27 – 29 paragraph 3.8.1 – National policies and issues: Planning Policy Wales is the first document referred to. From this, page 28 goes on to list national issues and priority areas (which were previously headline issues) which do not seem to fit into this

section. As page 29 goes back to National policies.

Page 60 – infrastructure includes flood risk, sewerage, surface water and SuDS, however they do not follow through into the key issues for the LDP.

The following should also be taken into account when preparing the Preferred Strategy:

- Foul drainage: As always please also consult with Dwr Cymru/Welsh Water on all foul drainage issues.

- The Environment Agency regulates waste water treatment works and discharges arising from parts of the sewerage networks, for example storm overflows. We must ensure that development does not pose a risk to the environment, and that sewerage infrastructure is improved so that planned proposals can be accommodated. This includes areas such as coastal towns and caravan parks where there is often a pressure to develop and expand and in which occupancy is seasonal, which causes local sewerage systems to be stressed at peak periods. This can pose a real risk of pollution of bathing waters, when pipework overflows.

- Surface water drainage: We would wish to see a policy on SuDS within the adopted LDP, therefore it should be included as a Key issue for the Preferred strategy.

- De-culverting: Environment Agency policy includes a general opposition to culverting. We are opposed to the culverting of watercourses as it involves the destruction of river and bankside habitat and the interruption of a wildlife corridor, acting as a barrier to the movement of wildlife including fish. TAN 5 “Nature conservation and planning” requires that any planning decisions should aim to maintain, and enhance, restore or add to biodiversity and geological conservation interests. In line with our culverting policy, we seek the removal of culverts wherever possible to re-establish river and bankside habitat and the continuity of the watercourse corridor. Is it possible to include a cross reference to the TAN 5 or our policy somewhere within the plan?

- Water supply: Please be mindful of water supply issues within the County, especially with regard to housing allocations.

- You should have a copy of our Carmarthen Bay Catchment Abstraction Management Strategy and the Water Resources Strategy for England and Wales.

- You are also advised to refer to Dwr Cymru/Welsh Waters, Water Resource Strategy, which gives advice on reducing water use and water efficiency savings in the home.

- Water Quality and Rivers: You have included the protection of surface and groundwaters within the SA/SEA, however it should be a key issue within the LDP. Please ensure that you refer to the Water Framework Directive.

- Please note, Bathing waters should also be included.

- Waste: We note you refer to the Regional Waste plan.

- Biodiversity: Please refer to the Local Biodiversity Action Plan

- Fisheries: Environment Agency Wales have a statutory duty to protect and enhance fish populations, as well as promote angling as a healthy and sustainable recreation. There is no mention of fish protection within the Plan. In this respect please note the following.

- Fish are one of the best indicators of a healthy water environment. The Water Framework Directive (WFD) recognises this, and fish are one of the measures of how well rivers are managed. Long term strategies such as the Local Development Plan should take account of the importance of rivers, for fish, wildlife and as a valued recreational resource.
- Soil Protection: There should be some reference to the Soil Thematic Strategy and the proposed Soil Framework Directive (Defra). We would also refer you to the Water Framework Directive with regards to diffuse pollution.
- Invasive Species: The deposit plan should mention invasive plant species, as these can threaten riverine habitats. The Environment Agency and your authority should have policies concerning their control and techniques to prevent spread.
- Contaminated Land: As an aside from the above comments, we recommend that the following legislative regimes/requirements be reviewed as part of the policies, plans and programmes-
 - Environmental Protection Act 1990, Part 2A Contaminated Land 2006. Consideration of the identification, management and re-use of contaminated land is required.
 - Water Framework Directive (WFD) and Groundwater Daughter Directive (GWDD) requiring a commitment to bring surface and groundwater quality to a good status and managing potentially contaminative activities.
 - GP3 – Policy and Protection of Groundwater Part 1 – 4 inclusive:
 - Part 1 – Overview. Groundwater Protection: Policy and Practice: Underground, Under Threat.
 - Part 2 – Technical Framework. Groundwater Protection: Policy and Practice: Underground, Under Threat.
 - Part 3 – Tools. Groundwater Protection: Policy and Practice: Underground, Under Threat.
 - Part 4 – Legislation & Policies 2008 Edition 1. Groundwater Protection: Policy and Practice (GP3).

Cemeteries

There is no mention of new cemeteries or extensions, should they be included? There is potential to pollute groundwater, which should be taken into consideration when allocating land.

Ref: TP0030
Respondent: Ms Louise Edwards
Organisation: Environment Agency Wales
Discussion Paper Section: Strategic Spatial Options and Settlement Hierarchy
Para No: n/a
Summary: The respondent reminds request that when allocating sites, to ensure that sufficient foul drainage arrangements are in place.

Ref: TP0031
Respondent: Ms Louise Edwards
Organisation: Environment Agency Wales
Discussion Paper Section: Population and Housing
Para No: n/a
Summary: The respondent provided no comment.

Ref: TP0032
Respondent: Ms Louise Edwards
Organisation: Environment Agency Wales
Discussion Paper Section: Site Assessment Methodology
Para No: n/a
Summary: The respondent notes that on page 2 that flood zones A & B are included within the physical constraints, but not C Zones?

Further down the page it states “strategic sites found to be compatible with the preferred strategy go forward to phase 3” (page 7), will these sites be assessed against ALL the criteria in phase 3? As there is a lot to check them against.

Ref: TP0033
Respondent: Ms Rosemary Thomas
Organisation: Welsh Assembly Government
Discussion Paper Section: Population and Housing
Para No: n/a

Summary:

The respondent notes:

- the advice that a Demographic Paper, and an LDP Population and Household Projections Report are also available on web-site.
- the intention to use the WAG trend/2006-based population projections (issued 2008) as basis for the LDP given that they were prepared by WAG with close collaboration with LAs & other key users in Wales (5.3, 5.7).
- that SWWRPG did not accept the WAG 2003-based sub-national projections at regional level (which were to be subsequently apportioned by the strategic planning groups), and that each authority agreed to undertake its own projections, which were to be aggregated up to regional level. (6.2)
- that the Draft Topic Paper has been prepared in advance of publication of WAG 2006-based household projections (published on 11 June 2009) & will be reviewed (6.3).
- that the Draft Topic Paper identifies a potential requirement of 13,405 additional households, which equates to 893 pa; (with 10% flexibility, gives range of 12,735 to 14,075 or 849 to 938pa). (6.4)
- that non-committed UDP sites are to be re-assessed.
- that Affordable Housing is to be handled in a separate statement. (9)
- that work is ongoing to examine needs in relation to Gypsies & Travellers (10)

The respondent provides the following comments:

The publication of WAG household projections has been accompanied by circular letter CL-02-2009 to all CPOs providing advice on how LPAs should respond in relation to emerging LDPs. WAG projected households for Carmarthenshire provide an increase of 17,900 households; from 78,000 in 2006 to 95,900 in 2021). The Draft Topic Paper should be reviewed to take account of this information.

The LDP and its supporting documentation will need to clarify how the LPA bottom-up evidence (LHMA, build rates, etc) supports the household projection used (be it either the WAG projections or the LPA's own policy-based projections should it choose to opt for that). The relationship between the overall housing requirement and the likely affordable housing requirement will need clarification.

Evidence is required of collaborative working with neighbouring LPAs in identifying housing requirements.

There is no reference to level of Affordable Housing need (currently unmet or projected) other than minimal reference at page 10. Need to be clear as to how the results of the Local Housing Market Assessment have been taken into account. Must address implications of optimising AH supply through the planning process, and the implications of AH need on level of housing land allocations in the LDP.

Need to clarify what 'may, where appropriate' means in relation to sites with planning permission being taken forward – are they to be assessed in relation to the LDP strategy & SA? (7.2)

Ensure that the required Accommodation Needs Assessment for Gypsies & Travellers informs LDP preparation.

Ref: TP0034
Respondent: Ms Rosemary Thomas
Organisation: Welsh Assembly Government
Discussion Paper Section: Issues, Vision and Objectives
Para No: n/a
Summary: Enhancement of Spatial Dimension - The respondent notes that there is reference throughout the paper to intentions to consider whether the vision and objectives should be given enhanced spatial relevance (e.g. paras 4.10, 5.6.2, 5.7).

Comment: At present all aspects covered by the Paper appear to be spatially indistinct; including the outlined main issues, vision and strategic objectives. The respondent considers that the spatial dimension is vital in informing the strategy of the plan.

Key Issues (table 1, section 3, appendix 1):

Note that document advises that pre-deposit consultation and a review of pre-deposit baseline data (appendices 1& 2) have resulted in a consolidated / prioritised list of (12) key LDP issues which have been grouped under the 5 'pillars' of the Community Strategy (page 6 & Table 1). Note that page 5 advises that headline issues to emerge from the Discussion Papers (and the subsequent consultation responses) included:

- Sustainable development
- Climate change
- Reducing need to travel
- Affordable Housing
- Rural – urban specific contrasts/ issues
- Welsh language and culture
- Accessibility and integrated transport
- Infrastructure – hard and soft (inc IT and home working)
- Protection of community and recreational facilities
- Character/distinctiveness.

Comment: 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 under each of the abbreviated key issue headlines (in Table 1). It would benefit the focus of the emerging LDP strategy if a small number of critical land-use issues were clearly identified which the LDP will aim to address and to deliver on.

Vision (section 4, page 38)

Note that para 4.10 says that the Summary Vision is intended to be taken forward into the Preferred Strategy; that the LDP Team may proceed to build upon the endorsed summary Vision by focusing on enhancing its spatial relevance; that this could be achieved by adding reference to the proposed settlement framework/hierarchy as set out in the Strategic Spatial Options and Settlement Hierarchy Paper in order to produce a detailed vision; that this detailed vision may appear in the Preferred Strategy.

Comment: The vision should provide a locally distinct and clear picture of where the authority wants to be in land-use terms by the end of the plan period, e.g. how the area will look and function, how it will have changed over the plan period and where the majority of development will have taken place.

14 Strategic Objectives (Table 2 + section 5, page 46-49). Note that the LDP objectives are rightly distinct from the SA objectives. Note paras 5.6.2, 5.7 on possible amendment to enhance spatial relevance.

Comment: As drafted, the objectives are very general and generic, sometimes not clearly land-use related and are not spatially explicit. In addition to enhancing their spatial relevance, further improvement would be to have SMART objectives which include details of the actions that need to be taken to achieve the vision (and timescales if appropriate) and which would make them easier to monitor and ensure the strategy is

being delivered.

Ref:	TP0035
Respondent:	Ms Rosemary Thomas
Organisation:	Welsh Assembly Government
Discussion Paper Section:	Strategic Spatial Options and Settlement Hierarchy
Para No:	n/a
Summary:	<p>Strategic Spatial Options: Note that 5 options were developed (sustainable distribution – the preferred strategy, urban growth, dispersal, no strategy, market led) (section 5). Comment: It is important that selected strategic options are realistic options for meeting the plan objectives and that levels of growth upon which they are based are identified. A ‘no strategy’ option is a misnomer and is not a realistic option as there is an extant unitary development plan – perhaps a ‘business as usual’ trend-based scenario would be preferable?</p> <p>Note that 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. Comment: 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. There is no obvious reference to capacities for development within the various settlements.</p> <p>Note that section 5.1 advises that in assessing the options each was considered in relation to SA/SEA compatibility, the community strategy (5 strategic pillars) and relevant LDP tests of soundness (i.e. consistency and coherence & effectiveness tests). Section 5.2 advises that the second KSF reviewed options by considering them against the proposed LDP objectives and was guided by a broad indication of growth in the plan area. The commentary for each option on pages 20-30 is helpful. Comment: It would be helpful to clarify what the ‘broad indications of growth’ are and how they impacted on both the development and the analysis of options.</p> <p>The preferred option ‘sustainable distribution’ (section 6) appears to reflect that of the UDP (3.3) Comment: It is not made clear how well the UDP strategy has fared 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.</p> <p>Settlement Hierarchy: The settlement hierarchy (4 tiers) appears to be based on a survey of existing facilities and services (including accessibility and transport) and also population size, proximity to other settlements and sewerage infrastructure capacity and constraints (8.2 & 8.3); with other contributions to assessment coming from other studies in due course (Biodiversity, SFCA etc). Comment: It is not clear what consideration has been given to potential for, and limitations to, development in settlements, and any future different roles for settlements. For example, what are the implications for Llanelli of restrictions to development caused by European habitats legislation.</p>

Ref:	TP0036
Respondent:	Mr Mark Galbraith
Organisation:	Llanelli Rural Council
Discussion Paper Section:	General
Para No:	n/a

Summary:

The respondent supports the preferred strategic spatial option (sustainable distribution-option I) and provides the following observations:

- Large scale housing development ought to be demand driven and based on genuine need and not driven by private property developers.
- Bearing in mind the potential number of new dwellings (13,405) over the life of the plan period and the bulk of the population residing in and around Llanelli, concern was raised over the future capacity of Llanelli's sewerage infrastructure. This will no doubt require infrastructure improvements to increase current capacity to cope with the additional demand.
- More needed to be done to redress the increasing number of empty dwellings in Carmarthenshire and the possible correlation with making such property available through affordable housing schemes.
- A Greater emphasis is required on the provision of social housing with more new social housing stock being built and possibly managed directly by Carmarthenshire County Council. A question was also raised as to whether consideration could be given to building more bungalows or sheltered units in Carmarthenshire to cater for the elderly, given that Carmarthenshire had an ageing population.

Ref:

TP0037

Respondent:

Mr D Selwyn Thomas

Organisation:

Carmarthen Town Council

Discussion Paper Section:

General

Para No:

n/a

Summary:

The respondent would like to see greater emphasis on the following aspects:

- Inclusion of specific measures for the defence and promotion of the Welsh language.
- Greater recognition of the impact of house building, schools etc. on the Welsh language and culture.
- Specific reference to the importance of bilingualism and use of Welsh as underpinning every aspect of life in the county.

The respondent contends that we have to more positive than simply stating 'Protecting and enhancing the county's unique cultural identity', and we would ask that specific steps to secure and promote the language are included in the final plan.

Ref:

TP0038

Respondent:

Mr Ben Lewis

Organisation:

GVA Grimley Limited

Discussion Paper Section:

General

Para No:

n/a

Summary:

The respondent writes to reserve our right to comment on the Papers at the next formal consultation stage, ie. the Preferred Strategy.

Ref: TP0039
Respondent: Wynford Davies & Derrick Davies
Organisation:
Discussion Paper Section: Population & Housing
Para No: n/a
Summary: The respondent assesses their submitted candidate site against the content of the Population & Housing Topic paper.

Ref: TP0040
Respondent: Wynford Davies & Derrick Davies
Organisation:
Discussion Paper Section: Site Assessment Methodology
Para No: n/a
Summary: The respondent assesses their submitted candidate site against the content of the Site Assessment Methodology Paper.

Ref: TP0041
Respondent: Wynford Davies & Derrick Davies
Organisation:
Discussion Paper Section: Strategic Spatial Options
Para No: n/a
Summary: The respondent assesses their submitted candidate site against the content of the Strategic Spatial Options Topic paper.

Ref: TP0042
Respondent: Mrs Daphne Davies
Organisation:
Discussion Paper Section: General
Para No: General

Carmarthenshire Local Development Plan: Topic Papers Consultation Responses

Summary:

The respondent provides a range of information including the following comments:

- The respondent questions how balanced a reflection of voters views is the Council's Corporate Plan?
- The objectives sound honourable but surely if the Corporate Plan has been decided by a few people with similar views then it could be faulty.
- Whether Random or organised the Corporate Plan will become a stimulus and hence lead to a reflex action. So, if half the people choosing the plan have a different view from those who have already chosen then defeated objectives could ensue.
- Strict adherence to rules created by a group with one nature can restrict creativity and innovation in others. I am sorely concerned that so little attention is being paid to Sewerage.
- The respondent is concerned about the condition of the County's sewerage pipes, and also about the number of new houses proposed, and the changes that have occurred in Llandeilo in recent years.
- With reference to 2.3 p15 Discussion and identification of LDP Strategic Objective is difficult when perhaps half of the democratically elected representatives are not involved in the local cabinet -those with a different view point. WAG guidance recommends the input of local members.
- Page 16 -sticking to cluster settlements is leading to small scale entrepreneurs - businesses and developers would prefer to be along good decent roads (Option 5 - to convey their goods). Not upgrading the Main Road to Pembroke Dock had a disastrous effect on a very well planned 24 hr Govan Docks.
- Caravans and Chalets with good washing facilities do no permanent harm to the environment. The respondent is concerned about decisions that are leaving town centres vacant, people having to travel for everything
- The respondent is concerned that LDPs will standardise places and will destroy individuality.

Ref: TP0043

Respondent: Lyn Bright

Organisation: Carmarthenshire County Council

Discussion Paper Section: Issues, Vision & Objectives

Para No: General

Summary: The respondent provides comments on the Strategic partnerships and their areas of responsibility. In the documents areas such as housing, play areas , transport, etc have been attributed to a strategic partnership but not the one that would include those items eg housing has been put under environment when in fact it sits under Health, play areas and green space has been put under environment when it sits in Leisure which is in Regeneration.

Ref: TP0044

Respondent: Mr David Harries

Organisation: Llannon Community Council

Discussion Paper Section: General

Para No: General

Summary: The respondent was generally happy to note the content of the topic papers, although there was concern at the projected increases in the County's population and the projected potential requirement for 13,405 new housing units within the County up to 2021 – with the majority of these being single occupancy units. The respondent was happy to note that issues of affordable housing, safeguarding the environment and the need to economically develop the area were being flagged up as key issues and drivers for the plan. The respondent also conveys its support for the substantive content of the 4 papers, subject to concerns on traffic, Welsh language, infrastructure and employment being noted.

Ref: TP0045

Respondent: Eurgain Powell

Organisation: Carmarthenshire County Council

Discussion Paper Section: Issues, Vision & Objectives

Para No: General

Summary: The respondent is pleased that Sustainable Development and climate change are top headline issues, along with "Reducing the need to travel" but believes that the Strategic objectives need to be strengthened to reflect these as priorities - in particular our focus on carbon reduction.

Its disappointing to find Climate change mentioned as part of SO5 along with waste and pollution - given its importance to CCC it feel it should be there as a distinct SO - with reference to mitigation AND adaptation. Also other Strategic objectives (page 10) to refer to SD but its all in relation to 'encouraging new development', rather than looking for ways to improve our use of existing resources.

On Page 28 - referring to national policies - SD section refers to the 4 elements of SD (including high levels of economic growth) as in our old SD policy. These are out-of-date by now, and you need to refer to the new principles within the UK SD Strategy (2005) and more recently the new WAG SD scheme.

Page 52 - testing the strategic objective against the sustainability objectives - the respondent is not too keen on language used here: "Delivering development that is sustainable often requires that a balance be struck between the losses and gains across social, economic and environmental components. In this case, the need to achieve social and economic development tends to suggests that there may be incompatibilities with environmental conservation." The respondent would push for the word balance to be changed in favour of integration (or something similar).

Ref: TP0046

Respondent: Cllr Mari Davies

Organisation: Llanelli Rural Council

Discussion Paper Section: All

Para No: General

Summary: The respondent comments that with regard to the Spatial Options and Settlement Hierarchy Paper, in noting the Preferred Strategic Spatial Option which had emerged from the process to date was Option 1 (Sustainable Distribution) and not Option 2 (Urban Growth) which has been the respondents preferred option, the County Council is urged to ensure that the needs of the Llanelli urban area, where the bulk of the County's population resides, are met in a fully sustainable fashion.

Ref: TP0047
Respondent: Mr & Mrs Ardolino
Organisation:
Discussion Paper Section: Population & Housing
Para No: General
Summary: The respondent disagrees with the household projection figure of 13,405 stating that the Welsh Assembly Government's projections published in June show a projected increase of 17,900 dwellings between 2006-2021, and requests that the LDP base the LDP housing requirements on the 11th June 2009 published figures for household growth.

Ref: TP0048
Respondent: Mr & Mrs Ardolino
Organisation:
Discussion Paper Section: Site Assessment Methodology
Para No: General
Summary: The respondent seeks clarification about how smaller settlements within the Ammanford / Cross Hands area will be considered, particularly Tycroes. The importance of smaller housing allocation contributions (3-4 dwellings) should not be overlooked, and the effect on existing settlements by ensuring high quality urban design. The site assessment criteria should focus on matters on the principle of development rather than ones which can be addressed as detailed issues at a later stage.

The topic papers do not provide any robust evidence that the accommodation of all the housing growth can be accommodated on brownfield sites and therefore a level of growth on greenfield sites may have to be accepted. Where these sites are located adjacent to the existing settlements, fields should be considered; it must be remembered that not all fields are of equal importance and that some have no or little agricultural uses and therefore are suitable to be released for housing.

The respondent also comments about their submitted candidate site.

Ref: TP0049
Respondent: Mr Ben Lewis
Organisation: GVA Grimley Limited
Discussion Paper Section: General
Para No: General
Summary: The respondent writes to reserve our right to comment on the Papers at the next formal consultation stage, ie. the Preferred Strategy.

Ref: TP0050
Respondent: Mr Ben Lewis
Organisation: GVA Grimley Limited
Discussion Paper Section: General
Para No: General
Summary: The respondent writes to reserve our right to comment on the Papers at the next formal consultation stage, ie. the Preferred Strategy.

Ref: TP0051
Respondent: Mr Ben Lewis
Organisation: GVA Grimley Limited
Discussion Paper Section: General
Para No: General
Summary: The respondent writes to reserve our right to comment on the Papers at the next formal consultation stage, ie. the Preferred Strategy.

Ref: TP0052
Respondent: Mr Tim Gent
Organisation: GVA Grimley
Discussion Paper Section: General
Para No: General
Summary: The respondent writes to reserve our right to comment on the Papers at the next formal consultation stage, ie. the Preferred Strategy.

Ref: TP0053
Respondent: Mr Owain Griffiths
Organisation: GVA Grimley Limited
Discussion Paper Section: General
Para No: General
Summary: The respondent writes to reserve our right to comment on the Papers at the next formal consultation stage, ie. the Preferred Strategy.