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Eich cyf : Your ref LDP MAC Stat/IRL
Ein cyf : Our ref
Dyddiad : Date **23 July 2014**

Dear Ian

**Carmarthenshire Local Development Plan
- Consultation on Schedule of Matters Arising Changes**

Thank you for your correspondence in relation to the consultation on proposed MACs. We note that the Schedule of Matters Arising Changes (& the 2 addendums) is supplemented by a Schedule of Implications for the SA & HRA.

We recognise your Authority's commitment to achieving a sound LDP and the amount of work by the forward planning team in reaching this stage. The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector to determine.

We have **no objections** to the proposed MACs under the tests of soundness.

We have included at the annex a small number of **comments** relating to clarity which may be of assistance to the Inspector at this late stage in considering suitable changes that we consider would not require advertising further for consultation. The majority of these relate to the monitoring framework (MAC 157) which we note has been significantly amended and improved.

Yours sincerely

Mark Newey
Head of Plans Branch
Planning Division
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Annex

(to WG Letter of Response to Carmarthenshire LDP - Consultation on Schedule of Matters Arising Changes, 23 July 2014)

1. MAC 31 & 32 (addendum version)

The housing land supply figure of 15,778 should be reflected elsewhere in the LDP; currently MACs 28 & 79 include an earlier figure.

2. Renewable Energy

We would restate our previous position in relation to policies RE1 and RE2 and the 1500metre separation distance between wind turbines and the nearest residential property (Hearing Session 10); this requirement could restrict the potential for such development.

3. MAC 157 Monitoring Framework:

- General

Whilst we support flexibility introduced in the assessment trigger, the short time-span that remains of the plan period may necessitate a percentage of less than 20% to focus on delivery of allocations. For example, the target to deliver 15,197 dwellings by 2021 allows for 20% flexibility or a 562 unit shortfall by 2016. To deliver on the plans strategy and objectives a lower percentage should be considered together with ensuring the focus on delivery is resonated across all indicators with a flexible trigger.

- Sustainable Development

The target needs to be clear that no highly vulnerable development will take place in flood zone C2; there are no related tests in TAN15 for such development. The Council should not be minded to approve such development in accordance with PPW and TAN15.

- Housing: Gypsies and travellers

The monitoring indicator for **permanent gypsy traveller site** doesn't state the number of pitches to be delivered in Llanelli (which should meet the identified need).

The monitoring trigger for **transit sites** is "one unauthorised Gypsy and Traveller site recorded in one settlement for three consecutive years". It is unclear why there is a requirement for unauthorised caravans to be recorded in the same settlement given that the level of need that arises in the County as a whole should be met.

- Housing: Affordable Housing

The assessment trigger on affordable housing delivery in sub-market areas should be clarified. It is unclear on the scope within which the delivery of affordable units will 'not accord' with Policy AH1. The assessment trigger should correspond with the overarching delivery of affordable homes, which currently allows for 20% flexibility or a 90 unit shortfall by 2016. Consideration should be given to lowering the percentage to meet the plan's objective on affordable housing delivery.

- Economy and Employment

Consideration should be given to amending the annual monitoring target to omit reference to 25% 'availability' on employment allocations by 2016 (i.e. first 2 years after adoption). A key objective of the plan is to attract inward investment and with just 7 years of the plan period remaining, the Council should be attaining permission for 25% of allocations every 2 years. An additional variance of 20% under the target figure, would allow just 5% of

allocations to be permitted or available by 2016. In order to meet market demand and deliver on economic objectives, lowering of the threshold should be considered.

- Retail

Consideration should be given to an assessment trigger for vacancy rates in primary and secondary retail frontages; this could entail a percentage increase or a rise in vacancy rates over 2 consecutive years.

- Waste

We note MAC 57 and the recognised requirement under TAN21 for voluntary joint arrangements to undertake annual monitoring on a regional basis. However, consideration should be given to a generic indicator that preserves sufficient capacity for waste management facilities in Carmarthen and meets Objective SO5 of the Plan.
