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Dear Ian,

**Carmarthenshire County Council's Local Development Plan (LDP) Deposit
(Regulation 17) Consultation: Welsh Government Representation**

Thank you for consulting the Welsh Government regarding the Carmarthenshire County Council Local Development Plan (LDP) Deposit plan and documents. We acknowledge the preparation of an LDP and the supporting evidence is a significant undertaking and recognise the amount of work your Authority has undertaken to date in moving the plan forward from the Preferred Strategy to Deposit stage.

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, including responding to national planning policy, the place making agenda, climate change emergency and demonstrating delivery of the strategy will be essential. Specific comments are set out in the annex to this letter with additional guidance contained in the LDP Manual (3rd Edition). In addition, the Welsh Government has published the Draft National Development Framework (NDF) for consultation. **The LDP will need to be in general conformity with the NDF when adopted. The Council should assure itself that general conformity can be achieved.**

Without prejudice to the Welsh Minister's intervention powers, the Welsh Government is committed to assisting Local Planning Authorities (LPAs) throughout the LDP process. The Deposit LDP has been considered in accordance with the tests of soundness as set out in Planning Policy Wales (PPW, Edition 10) and the LDP Manual. **Our representations are separated into three categories set out by topic area, with further detail in the attached annex.**

Category A: Fundamental issues that are considered to present a significant degree of risk for the LPA if not addressed prior to submission stage, and may have implications for the plan's strategy.

None.

Category B: Matters where it appears that the deposit plan has not satisfactorily translated national policy down to the local level and there may be tensions within the plan, namely:

- **Growth levels homes and jobs**
- **Spatial strategy and distribution**
- **Affordable housing**
- **Reserve Sites**
- **Delivery and implementation**
- **Gypsy and Traveller Provision**
- **Employment provision and allocations**
- **Burry Inlet**
- **Flood risk**
- **Best and Most Versatile (BMV) agricultural land**

Category C: Whilst not considered to be fundamental to the soundness of the LDP, we consider there to be a lack of certainty or clarity on the following matters:

- **Components of housing supply – clarity and presentation**
- **Welsh Language**
- **Renewable Energy**
- **Gypsy and Traveller policy**
- **Employment safeguarding policy**
- **Minerals**
- **Monitoring**

It is for your Authority to ensure that the LDP is 'sound' and it will be for the Inspector to determine how the examination proceeds if you submit the plan without addressing the concerns we raised. You should consider how you can maximise the potential of your LDP being considered 'sound' through the examination process. Members of my team look forward to meeting with you and the team to discuss the matters arising from this response. If you have any queries in the meantime, then please do not hesitate to make contact.

Yours sincerely,



Mark Newey
Head of Plans Branch
Planning Directorate

Annex to Welsh Government Letter (25 March 2020) in response to Carmarthenshire County Council's Deposit LDP 2018-2033

Category A	Objections under soundness tests; <u>fundamental issues</u> considered to present a significant degree of risk if not addressed prior to submission.
Category B	Objections under soundness tests; matters where it appears the Deposit Plan has not satisfactorily translated national policy to the local level or there are tensions within the plan.
Category C	Objections under soundness tests; whilst not considered being fundamental to the soundness of the LDP, there is a lack of certainty or clarity on the matters which can be usefully addressed.

Category B – Growth Levels: Homes and Jobs

The Preferred Strategy tested 6 demographic and 2 employment-led growth scenarios. The Authority concluded that the 'PG Long Term' scenario based on internal migration rates and international migration flows over a 16-year period (2001/2-2016/17) was the preferred growth option. In the local context, natural growth is negative in Carmarthenshire with deaths exceeding births and net migration becoming the main driver of population change. The Preferred Strategy proposed a 6% flexibility allowance (of 593 units) to deliver a housing requirement of 9,887 dwellings.

At Deposit stage a further 3 scenarios were tested by Edge Analytics (September 2019) to incorporate the latest demographic evidence, including the 2018 mid-year population estimates, and to exclude areas in Carmarthenshire located in the Brecon Beacons National Park Authority (BBNPA). The 3 demographic scenarios tested internal migration and international migration flows over a 'PG Short Term' (4 year) 'PG 10 year' and 'PG Long Term' (17 year) period, which resulted in a dwelling requirement of 8,769, 8,835 and 10,065 units respectively using an alternative vacancy rate of 3.4% based on local council tax records.

The Deposit plan is based on the 'PG 10-year' scenario which results in a dwelling requirement of 8,835 units (assuming migration flows of +1,337 persons per year). **This is a reduction of 1,052 dwellings from the Preferred Strategy and an increase of 7,565 units above the WG-2018 based principal household projections.** The housing requirement of 8,835 units is a reduction of 6,362 dwellings from the housing requirement (15,197 homes) in the adopted plan.

Evidence in the 'Edge Analytics Study' (2018) explains that the 2 employment-led scenarios would result in a requirement for 17,396 and 19,690 homes over the plan period, which the Council recognise is a high level of growth that would be undeliverable and unsustainable in Carmarthenshire. Housing completions over a 12-year period (2007/8-2018/19) averaged 485 dwellings per annum with recent completions from 2015 averaging 507 dwellings per annum. The Council has chosen a demographic growth scenario that will support employment growth and the delivery of 5,310 jobs (354 per annum) over the plan period. **The Authority must fully evidence and explain how the scale of growth relates to the latest projections taking account of housing need and impacts on the Welsh language.** (See comments on the spatial strategy). **The evidence needs to demonstrate where in-migration will be derived from, i.e. neighbouring counties, elsewhere in**

Wales, the UK, or international migration taking into account the likely effect of UK immigration policy.

As the Welsh Government 2018-based projections were published in February 2020, the Council will need to consider their implications on the plan. The Council will need to ensure the level of growth is deliverable, the levels of migration can be achieved and impacts on the Welsh Language have been fully considered.

Category B – Spatial Strategy and Distribution

The Authority has tested 6 spatial options to identify how future growth will be distributed across the plan area. The Council's preferred option is a hybrid approach that builds on Strategic Option 4: Community Led and reflects the role and function of settlements whilst providing opportunities for growth in urban and rural areas (LDP, paragraph 8.20). Policy SP16: Sustainable Distribution, identifies 6 clusters. Within each cluster is a functionally linked area with 4 settlement tiers comprising Tier 1: Principal Centres, Tier 2: Service Centres, Tier 3: Sustainable Villages and Tier 4: Rural Villages. **The Welsh Government does not object to the principal of this approach, providing that the majority of development is directed to sustainable locations in the County and the impacts on Welsh language have been fully considered** (see specific comments).

a) Spatial distribution of large windfall sites

The Welsh Government considers that the spatial distribution of housing across all clusters and settlement tiers is incomplete. There is a significant amount of information regarding the components of housing supply spread across the plan and its supporting evidence base (Housing Supply Topic Paper, January 2020). However, this is not in one place, as required by the DPM Edition 3. The Welsh Government has attempted to attribute the plans housing growth to the relevant tiers and clusters in the tables overleaf. It appears the majority of development (excluding large windfalls) is directed to the most sustainable locations in Tiers 1 and 2 (70%) which is broadly supported and addresses, to some extent, our concerns raised at Preferred Strategy stage. **However, this distribution excludes 1300 units on large windfall sites, a significant omission.** Without clarity on this matter, **the spatial distribution or suitability of the strategy in terms of sustainability and impacts on the Welsh language is unclear and requires clarification.** Whilst the scale and distribution of large windfall sites is unclear, **the Welsh Government envisages the majority would come forward in Tiers 1 and 2 and Clusters 1 and 2?** This position is supported by policy in the draft National Development Framework (NDF) which focuses growth in the 'Mid and South West Region' to the Principal Centres of Llanelli and Carmarthen. The Council's 'Role and Function' Topic Paper highlights the majority of Tier 3 settlements having limited or no key facilities / primary services (Table 13) and the rationale for supporting further developments here would be unclear. (See also comments relating to Tier 4 and 5 specifically).

Table 1: Spatial Distribution by Settlement Tier

	Tier 1: Principal Centre	Tier 2 : Service Centre	Tier 3: Sustainable Villages	Tier 4: Rural Villages	Approximate Totals
Completions and units with permission	1,493	1,051	288		2,832
Allocations	2,555	1,030	579	0	4,164
Large windfalls					1,342
Small windfalls	525	368	435	505	1,833
Approximate Totals	4,573 (45%)	2,449 (24%)	1,302 (13%)	505 (5%)	10,171

Table 2: Spatial Distribution by Cluster

	Cluster 1	Cluster 2	Cluster 3	Cluster 4	Cluster 5	Cluster 6	Approximate Totals
Completions and units with permission	592	1,402	655	27	12	144	2,832
Allocations	1,054	1,657	651	375	100	327	4,164
Large windfalls							1,342
Small windfalls	*95	*46	*107	*61	*130	*66	1,833 including *505 units in Tier 4
Approximate Totals	1,741 (17%)	3,105 (31%)	1,413 (14%)	463 (5%)	242 (2%)	537 (5%)	10,171

b) Policy HOM3: Homes in Rural Villages (applicable to Tier 4 Settlements) – clarification and justification of approach

The Welsh Government is seeking clarification and justification for the level of growth attributed to Tier 4 settlements. The policy states that proposals for 1-4 dwellings will be permitted in these settlements and due to viability evidence this is likely to be for market housing only. The plan directs 500 dwellings to Tier 4 settlements. PPW states that only infill or minor extensions to existing settlements in the countryside may be acceptable (paragraph 3.56). The Council should explain how the scale of growth in rural villages aligns with the requirements of PPW, the role and function of those settlements which have limited services and facilities and an assessment on the opportunities for growth in this tier, having regard to the implications for the Welsh Language. The following must be addressed:

- Appendix 1 of the 'Housing Supply' Topic Paper lists the Tier 4 settlements with 'appropriate numbers within the settlements' and a 'cap on new proposed dwellings within the settlement'. In addition, Appendix 2 states that many of the Tier 4 villages already have extant planning permission / existing LDP allocations, way in excess of the proposed caps? **It is unclear what the total housing proposed in Tier 4 villages is**, i.e. what is currently extant and how this relates to the 20% uplift in each settlement. Is the 20% in addition to sites with planning permission? Are current LDP allocations being 'rolled over' and included in capacity at these settlements?
- **There is no justification for a blanket 20% numerical uplift** to the number of existing homes in each rural village, totalling 505 units (subject to clarification) on small sites (1-4 units) with no settlement boundaries. **The rationale for this blanket approach has not been evidenced** and it is unclear why the uplift has been applied equally to all villages when the 'Role and Function' Topic Paper identifies some villages as more sustainable than others. The reasoned justification to the policy suggests the 20% cap could be exceeded even further to deliver affordable homes? It is questionable how this approach would be implemented in practice. **Thresholds/caps have not worked well in other parts of Wales.**
- The Council's 'Rural Needs Study' 2019 states that in rural settlements, there is a predominant need for smaller affordable homes. While commuted sums may be achievable in some cases, it is likely that the majority of housing delivered in these settlements will be for market housing. In addition, the study also highlights that half of the properties sold in these areas are likely to be for people outside the County Borough. **The policy appears at odds with the evidence base.** It is unclear how this approach aligns with findings in the SA/SEA, which identifies that growth and inward migration has the potential to dilute the Welsh language, which would be frustrated by the development of market housing in rural villages.

c) **Policy HOM4: Homes in Non-Defined Rural Settlements (Tier 5)**

The policy currently permits up to 2 local needs affordable housing in unidentified hamlets or groups of dwellings. **This approach is contrary to PPW**, which clearly states that "new buildings in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled" (paragraph 3.56). The policy does not identify hamlets or groups of dwellings. Policy HOM4 should be deleted accordingly. **The Welsh Government considers it would be appropriate to deliver local needs/affordable housing in identified Tier 4 Rural Villages.** This would align with the Council's own evidence base and SA conclusions in respect of the Welsh Language. (See specific comments on Welsh Language).

Category C – Components of Housing supply– Clarification and presentation

The Welsh Government has the following observations on the housing components and policies in the plan:

- Policy HOM1: Housing Allocations includes sites with planning permission. The DPM is clear that allocations and commitments should be separated to aid clarity of the plan. If the Council wishes to identify committed housing sites these should be listed in a separate policy and clearly identified on the Proposals Map. Key sites with planning permission, such as PrC1/MU1 West Carmarthen, may require a separate

policy as greater evidence is necessary to deliver the site and plan strategy. (See Delivery and Implementation comments.)

- The Council has discounted 1717 units from the landbank. The Welsh Government does not object to the principal of this approach which is advocated in the DPM. **However, clarification is sought on the status of sites ‘discounted’ in Appendix 2 of the ‘Housing Supply’ Topic Paper.** Appendix 2 states ‘sites that have been omitted from the revised LDP’. However, commentary next to some individual sites suggests they have ‘development potential for inclusion in the plan’, which is at odds with being discounted in the first place? Clarity is required on the status of Appendix 2 and the LPA should be clear what sites have been discounted, or why sites have been ‘added back in’ through other means (i.e. windfalls).
- The Council’s large site windfall allowance (+5 units) is 89 dwellings per annum based on past trends over a 12 year period (2008-2019). Within this period are years of high completions (+120 units) and low completions (40 units) which have not been discounted from extrapolation rates. **The Council must robustly evidence the large sites windfall allowance of 89 units per annum to ensure it is appropriate, robust and deliverable.**
- The small sites windfall allowance (1-4 units) is 122 dwellings per annum, which exceeds completions over the past 4 years which average 102 units (2019 JHLA). The Council should explain why the small sites allowance in the plan is not in line with past trends?

Category C – Policy WL1 Welsh Language and New Developments

As worded, the policy requires planning applications for windfall sites to be submitted with a Welsh Language Impact Assessment (WLIA). While the requirement to submit a Language Action Plan is sensible and in line with national policy, it is unclear why the LPA is seeking a WLIA on windfall sites over 10 units in Principal / Service Centres and on 5 or more homes in Sustainable Villages? The impacts of housing growth at specific locations on the Welsh Language (above the LPAs chosen threshold) should have been tested through the SA process. **This is an excessive approach and requires justification / amendment in light of policy in TAN 20.** The LPA has set a threshold of 5 units for large allocated and windfall sites across the County (para 11.83 of the Plan). The relationship between the threshold and Policy WL1 requires explanation. We have commented previously on the impacts of Welsh Language in Tier 4 settlements.

Category B – Affordable Housing

Local Housing Market Assessment - PPW identifies the LHMA as a core piece of evidence setting out the level and type of housing need in an area. Only a draft LHMA Area Summary has been submitted as part of the evidence base and whilst this Summary (December 2019) identifies a need for 2,304 affordable homes (154 units per annum) over the plan period, it does not set out the tenure split. **Without knowing the tenure mix for social rent and intermediate housing, it is unclear if the 50% social rent and 50% intermediate housing tested in the viability assessment is appropriate, especially as the level of intermediate housing seems high.** This will impact on the viability assessment, both plan-wide and site specific targets and thresholds in Policy AHOM1.

Affordable Housing Targets and Thresholds - The affordable housing checklist in the DPM sets out the information that all LDPs should contain to support the delivery of

affordable housing. Taking on board our previous comments on the tenure split, the Council will need to consider how findings in the viability assessment have informed Policy AHOM1 in the plan. The Welsh Government has no concerns on the model used in the high level study, nor the cost inputs, this will be for the industry to comment on. However, the Welsh Government has concerns on the policy approach regarding the use of action areas (6 or 4?), median income and site size, implemented through the target ranges in AHOM1. **The approach is unclear and confusing and it is not possible to ascertain if the targets are appropriate, viable or maximise affordable housing in the Country.** The following needs to be addressed:

- **It is unclear why the Council has moved from a market area viability approach in the adopted LDP to an approach based on site size.** Does a site of 19 homes have the same viability/costs across the entire County Borough? The current adopted plan approach of market areas suggests this may not be the case?
- **The policy is also linked to a median household income approach across 4 (or 6?) Affordable Housing Action Areas (AHAA).** The approach is confusing, and it is unclear how this would be implemented in practice. It is also unclear how it relates to areas of viability and why it is appropriate to replace the Welsh Government's Acceptable Cost Guidance (ACG) in favour of this approach? How does household earnings impact on site viability, particularly as earnings will vary year on year? **The Council needs to explain this approach and why it is different to residual values determined across sub-market areas in the adopted plan.**
- **It is unclear how the policy ranges relate to the viability assessment, especially as the assessment does not appraise sites by range or identify the AHAA's?** For example, the final appraisal in Appendix E of the viability assessment identifies that 26% affordable housing is viable on a 72 unit site. How does this align with Policy AHOM1 and a target of 20-25% on sites of 50+ units? How does an approach of ranges/site size maximise affordable housing?
- It is also unclear why affordable housing on allocated sites and large windfalls has been calculated using the lowest percentage target?
- There is no policy for affordable housing led sites (50%) affordable housing on public land. <https://gov.wales/increasing-supply-affordable-homes-through-planning-july-2019>

Category B – Reserve Sites Policy

Policy SG2: Reserve Sites lists 5 sites for a mix of uses including residential, employment and waste, which will be released for development if allocated and committed sites fail to come forward as expected. **The rationale for the Reserve Sites policy is unclear not only because the Council has applied a discount allowance to committed sites in the landbank, but also because the plans flexibility allowance (of 15%) should account for non-delivery and unforeseen circumstances on sites.** It is unclear how an application would be considered on such sites and its release controlled? It is not appropriate to add / remove sites through the monitoring framework outside of a formal plan review.

Category B – Delivery and Implementation

The delivery of the strategy is reliant on the Authority allocating sites that are viable and deliverable in accordance with the spatial strategy and settlement hierarchy. The DPM sets

out the key issues that must be addressed in Chapter 5 and the Council should ensure all relevant aspects are covered with particular attention on the de-risking checklist. To demonstrate site delivery and implementation **the plan must be underpinned by site specific viability work, a robust housing trajectory and effective use of placemaking on key sites.** The Authority should consider the following:

- There is a focus in the plan through Policies SG1 and SP5 on developing strategic and large scale regeneration and mixed-use sites. Sites of over 100 units in Appendix 1 of the Infrastructure Plan are supported by information on phasing, infrastructure requirements and planning obligations but there is **no evidence on master planning, viability, detailed costs or commitment from developers through Statements of Common Ground (SoCG).**
- The DPM is clear that an Implementation and Delivery Appendix must be included in the plan, which sets out key issues, constraints, phasing and mitigation measures on allocated sites.
- A housing trajectory has been included in Appendix 7. The Council should follow detailed guidance set out in the DPM to construct the trajectory ensuring it is calculated on the housing requirement and not provision.
- With pooling restrictions on S106 agreements the Authority should ensure it is able to fund the necessary infrastructure requirements.

Category B – Gypsy and Traveller Provision

The Council's approved 2016 Gypsy Traveller Accommodation Needs Assessment (GTANA) covers the period from 2016 to 2021. The 'updated' 2019 GTANA included as part of the Council's evidence base has not been approved by Welsh Ministers. To comply with legislation, planning policy and guidance **a GTANA must be agreed by Welsh Ministers in advance of submitting the plan for examination covering the whole plan period from 2018 to 2033 with provision made for appropriate and deliverable sites in Policy SP9 to meet identified need within the required timescales.** Failure to approve a GTANA and meet the required need is likely to result in the plan being unable to be found 'sound'. We would therefore urge the Council to work with our Communities Division to ensure an approved GTANA is submitted for examination.

The SA/SEA has a negative appraisal of Gypsy and Traveller Sites listed in Policy SP9 as the allocations are affected by flooding in Zone C1 to varying degrees. TAN 15 categorises caravan parks as highly vulnerable development and this should only be identified in Zone C1 subject to application of the justification tests and site specific Flood Consequences Assessment (FCA) as set out in the SA/SEA. The views of statutory bodies, including NRW, must also be considered to demonstrate the sites comply with national policy and are deliverable.

Category B – Employment Provision and Jobs

Growth forecasts over the plan period evidence employment growth of 5,310 new jobs (354 a year). **There appears to have been no assessment on the number of jobs in the Class B sector or how this aligns to the scale of employment allocations in the plan,** totalling 77.93ha in Policy SP6. The evidence should be clear on the scale of B-Class jobs and how this has informed the level of employment provision in the plan by sector.

Category B – Employment Allocations

The employment allocations listed in Policy EME3 are largely made-up of parcels of land within strategic and local employment sites. Whilst the Welsh Government does not object to the principle of this approach, **there does not appear to be any evidence supporting the choice of employment allocations** in the plan. Neither the Employment Land Review (ELR) nor the two-county economic study identify local employment sites that are suitable for allocation. The Council must clearly explain the rationale for identifying the employment allocations in Policy EME3 based on sector growth and demand and site delivery and availability over the plan period.

Category B – Policy INFA4 Llanelli Waste Water Treatment Surface Water Disposal

Development in the Llanelli Waste Water Treatment Works (WWTW) catchment area includes the centres of Llanelli and Burry Port and is subject to high level environmental considerations due to water quality in the Carmarthen Bay and Estuaries European Marine Site (CBEEMS). Whilst Welsh Water have confirmed there is capacity to accommodate planned growth in the Llanelli WWTW catchment area, this will be subject to a scheme of compensatory surface water removal on all major developments to protect the environmental quality of the CBEEMS. The Council emphasise this approach builds on established provisions in the Burry Inlet Memorandum of Understanding (MoU) last updated in September 2011 and to be replaced by a high level Statement of Common Ground (SoCG) between Natural Resource Wales (NRW), Welsh Water, Swansea and Carmarthenshire Councils. **As the SoCG is yet to be finalised, the Council must ensure the approach set out in Policy INFA4 is robust and deliverable taking account of the cost of bespoke solutions** on residential, employment and strategic sites in Llanelli and Burry Port.

The Council should also consider including key information from the draft SPG into Policy INFA4, such as the requirement for development proposals to submit drainage reports and criteria on piece-meal developments.

Category B – Policy CCH4 Flood Risk Management and Avoidance

The Authority has undertaken a high level Stage 1 Strategic Flood Consequences Assessment (SFCA) with information on the level and nature of flood risk on Candidate Sites and existing allocations in the extant LDP. The Council's Stage 1b SFCA builds on these findings and looks in detail at selected Candidate Sites, extant allocations and proposed Gypsy and Traveller sites in Llanelli, Burry Port and the surrounding areas. From the Stage 1b SFCA **it is unclear which allocated sites listed in Policies HOM1 and SP9 are subject to flood risk** as the site numbering in the SFCA does not align with either policy. PPW is clear that development should be avoided in areas of flooding (paragraph 6.6.22). As worded, Policy CCH4 permits all development subject to meeting the justification tests in TAN 15. **It should be clear that no highly vulnerable development will be permitted in Zone C2.**

Category B – Best and Most Versatile Agricultural Land

PPW is clear agricultural land of grades 1, 2 and 3a is the best and most versatile and should be conserved as a finite resource. In the Council's SA Scoping Report (Appendix B)

it identifies a patchwork of grade 3 land but does not provide detail on the split between grade 3a and 3b nor the data source of this information. Whilst the Scoping Report identifies that the majority of land in Carmarthenshire is grade 4 **some of the allocated housing sites totalling 725 units are located on BMV land** including PrC1/MU1 and SeC18/h6. The Council must be able to robustly justify any loss of BMV land linked to the search sequence in PPW and findings in the SA.

Category C – Policy CCH1 Renewable Energy

A large proportion of the Authority is within Priority Areas 11 and 13 for solar and wind energy in the draft NDF. The Authority has prepared a Renewable Energy Assessment (REA) in line with the Toolkit Methodology which concludes that there are no suitable wind Local Search Areas (LSAs) and 4 LSA for solar PV farms. The plan will need to be in conformity with the NDF i.e. how it relates to the priority areas. The Authority will need to:

- Identify the 4 LSAs for solar in Policy CCH1.
- Demonstrate how the REA has been embedded into the Candidate Site process and explain how renewable energy and low carbon opportunities have informed the scale and location of growth.
- Include as part of the monitoring framework the contribution of the plan area toward developing and facilitating renewable and low carbon energy.
- Include in the policy framework opportunities for local renewable and low carbon energy generation schemes.

Category C – Policy GTP1 Gypsy and Traveller Accommodation

As worded, Criterion 2 (in part) is contrary to Welsh Government Circular 005/2018 as the text (in brackets) ‘relating to need identified in settlement boundaries’ acts against freedom of movement for Gypsy and Travellers who wish to develop their own sites. The text should be deleted accordingly.

Category C – Safeguarding of Employment Sites

The strategic sites identified in Carmarthenshire through the two-county summary report are considered to offer strategic benefits and should be protected. **The 6 strategic sites and all other existing employment areas identified on the Proposals Map should be clearly listed in a separate safeguarding policy.** The DPM identifies that safeguarded sites should be protected for a range of B-Class uses.

Category C – Minerals

The Authority should continue to work with other Authorities in the South West Region to ensure the requirements of the recently endorsed Regional Technical Statement (RTS) are satisfied. At present, **Carmarthenshire does not provide any evidence to show that the requirement for an additional 2.94mt of sand and gravel (as set out in the RTS 1st) has been satisfied** in the South West region. RTS 2nd Revision, which was consulted on last autumn, identified that a ‘Sub-Regional Statement of Collaboration’ should be prepared to demonstrate how the Authorities satisfy the requirements of the RTS. This statement should be completed before the plan is submitted for examination.

Category C – Monitoring Framework

Monitoring indicators listed in the DPM should be embedded into the LDP monitoring framework with trigger points that are not too wide ranging (at 20%).
