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Re: Second Deposit Revised Local Development Plan Consultation – objection to weakening of landscape designations in Carmarthenshire

This submission is made as residents, in a family capacity, in response to public consultation on the Carmarthenshire Local Development Plan 2018-2033 (Second Deposit) (hereafter 'Revised LDP') to express objection to weakening of landscape protection through removal of the Special Landscape Area designations contained in the 2006-2021 Local Development Plan (hereafter 'Current LDP'). On which issue, we further submit that the plan-making process is unsound – lacking transparency with an absence of explanation or justification of the decision.

The Current LDP recognises 18 Special Landscape Areas: 'landscapes in Carmarthenshire that are considered to be of greatest importance, and which are worthy of the protection that the designation of Special Landscape Area provides'¹.

As Natural Resources Wales explains: Special Landscape Areas are 'designated for intrinsic physical, environmental, visual, cultural and historical value in the contemporary landscape. Designated SLAs may be unique, exceptional or distinctive to the area and included in a Local Development Plan (LDP) to apply an extra level of protection through special landscape policies'².

In the case of the **Tywi Valley**, for example, the Current LDP highlights that '[i]nappropriate development continues to threaten the conservation of this outstanding landscape, hence the reason for its designation'³. The current LDP was adopted in 2014. Almost a decade on, inappropriate development continues to threaten this outstanding landscape: not least in proposal for construction of 27m-high pylons through the Valley as part of the Green GEN

¹ [Carmarthenshire Local Development Plan 2006-2021: Appendix 4 – Special Landscape Areas](#)

² [LANDMAP Guidance Note 1: LANDMAP and Special Landscape Areas 2017](#), p2

³ [Carmarthenshire Local Development Plan 2006-2021: Appendix 4 – Special Landscape Areas](#)

Towy-Usk project and to which Carmarthenshire County Council has expressed its opposition⁴. Likewise, our Community Councils are alert to the conservation threats – opposing inappropriate development⁵ and pointing to the ‘significant detrimental effect ... on the natural beauty of the Valley and its rich history’⁶.

We challenge the timing of removal of the Special Landscape Area designation, when needed most to protect and enhance our special landscapes in Carmarthenshire for present and future generations.

We also question the rationale and evidence base for this decision, which has not been made explicit in the published Written Statement or accompanying Evidence Base of the Revised LDP.

As Natural Resources Wales indicates, there are several reasons for SLA designation⁷:

- To recognise and protect (through development management) locally valued landscapes important for their distinctive character, qualities and sense of place/*bro*.
- To influence positive landscape planning. For example by producing design guidance to enhance landscape character or to target land management grants towards the conservation of special landscape features recognised within the SLA.
- To raise understanding and appreciation of the importance of local landscapes by communities, visitors and the wider public.

In light of which, it is reasonable to ask:

Is the **Bran Valley** no longer considered of importance and worthy of protection afforded by Special Landscape Designation? If so, why?

Has the intrinsic physical, environmental, visual, cultural and historical value of **Mynydd y Betws** declined in the past decade so as to warrant removal of an extra level of protection? Again, if so, why?

What of the locally valued landscape of the **Teifi Valley** and its distinctive character, qualities and sense of place? Why are these less important in 2023 than hitherto?

Is it really no longer desirable to use SLA status to raise understanding and appreciation by communities, visitors and the wider public of **Carmarthen Bay and associated estuaries**?

... and so on for each of the respective 18 Special Landscape Areas so designated in the Current LDP but removed in the Revised LDP.

⁴ [Cabinet Meeting 27 March 2023 webcast](#), Leader Cllr Price: ‘[in the last meeting] this Council unanimously agreed to oppose the pylons that are proposed for the Towy Valley’.

⁵ [Llangathen Community Council Minutes 21 March 2023](#)

⁶ [Manordeilo and Salam Community Council Minutes 08 March 2023](#)

⁷ [LANDMAP Guidance Note 1: LANDMAP and Special Landscape Areas 2017](#), pp3-4

The rationale for removal in the Revised LDP of the SLA designation – wholesale in principle and individually in practice for each of the 18 landscapes – is unclear. Evaluation of implementation of the Current LDP has not questioned the effectiveness of SLA Policy EQ6: quite the opposite, indicating that targets have been achieved or exceeded, placing implementation in the ‘green’ in assessment using a traffic light reporting tool⁸. Indeed, at the time of the LDP Review (published in 2018), the report indicates: ‘Whilst no fundamental changes are envisaged, the policy will respond to contextual (including legislative and policy changes), factual and evidential changes as well as those resulting from any revisions to the strategy’⁹.

What, therefore, are the contextual, factual and evidential circumstances that have resulted in this fundamental change resulting in removal of the 18 Special Landscape Area designations in Carmarthenshire?

Welsh Government planning policy continues to seek to maximise environmental protection and to limit environmental impact in respect of distinctive and special landscapes - encouraging local authorities to develop ‘policies for landscape features, characteristics and qualities of local significance, and the designation of Special Landscape Areas (SLAs)’¹⁰. Welsh Government policy in respect of SLAs has not changed: why has that of Carmarthenshire Council?

We therefore ask that Carmarthenshire Council makes public the evidence base for this fundamental policy change.

As remedy, we request that the 18 Special Landscape Areas are reincorporated into the Revised LDP before adoption.

Further to provisions in Welsh Government procedural guidance¹¹, we also request opportunity to speak on this representation at a hearing session of the LDP examination.

Many thanks for your time in considering our response to consultation on the revised LDP and our objection to weakening of landscape designations in Carmarthenshire.

Regards,

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⁸ [Carmarthenshire Local Development Plan: LDP Review Report 2018](#), p9

⁹ Ibid, p79

¹⁰ [Planning Policy Wales](#), edition 11, 2021, p135

¹¹ [Local development plan examinations: procedure guidance](#) 2022, section 1.7 states: ‘Those who have sought changes to the submitted plan or plan revisions and have indicated that they would like to speak must be invited to the hearings.’