

Changes to Carmarthenshire County Council's Local Development Plan

1. Strategic Policy – SP1: Strategic Growth

“The LDP will provide for the future growth of a sustainable economy and housing requirement through the provision of:

9,814 new homes to meet the identified housing requirement of 8,822.”

We oppose the construction of 9,814 new homes in the county and believe that housing needs to be built for the current demand in the county and solely for the anticipated growth in the county's population.

2. PrC1/MU1 - West Carmarthen, Carmarthen

“Mix of uses proposed consisting of residential (an allowance for 700 new homes within this plan period), employment, community facilities (including a primary school) and amenity.”

A commitment should be made from the outset to identify all new schools in the county as Welsh-medium in order to contribute to making the Welsh Government's Cymraeg 2050 strategy a reality and in light of the severe linguistic decline seen in the county over the last twenty years.

3. Total Affordable Units in Plan period

Here are examples below but it's a general point for all clusters in the entire LDP.

☐ PrC1/h4 – Land off Parc y Delyn 17 1.7 Years 11-15

☐ PrC1/h5 - East of Devereaux Drive 10 1 Years 6-10

☐ PrC1/h10 Brynhyfryd 20 2.4 Years 6-10

☐ PrC1/h12 Castell Pigyn Road, Abergwili ☐ 35 4.2 Years 6-10 Years 11-15

☐ PrC1/MU1 West Carmarthen ☐ 222 26.64 Years 1-5 Years 6-10

☐ PrC1/MU2 Pibwrlwyd 247 61.75 Years 11-15

☐ PrC1/(iv) – Land off Trevaughan Road 30 3.6 Years 11-16

Why does the rate of affordable units vary from development to development? Isn't the same percentage needed throughout? We believe that the current percentages above are insufficient and fail to contribute to the places with a housing crisis that exist in the county and nationally. We recommend a percentage of 50% as a minimum. Housing developments on a commercial level for developers are the remainder that will be for sale on the open market and attract more wealthy buyers who are on wage rates that are beyond the majority of the county's residents.

4. Strategic Policy – SP 5: Affordable Homes Strategy. The Plan will maximise the delivery of affordable homes up to 2033 through the provision of a minimum target of 2,111 1,900 affordable homes. This will support the development and enhancement of sustainable, balanced communities.

While we support planning to increase the number of affordable homes from 1,900 to 2,111, this is not really much of a change. We also believe that there is a need for a significantly higher rate of affordable housing based on a methodology of the county's waiting list numbers, the current housing stock available for rent and an assumption of growth in the county's population over the next 15-20 years. There's no doubt that the

current number will not succeed "...to help develop and improve sustainable and balanced communities."

"New paragraph number: In combining all methods of affordable housing contributions through the planning system the target set out in Policy SP5 is the starting point for the provision of Affordable Housing within the county, with the Plan seeking to maximise the provision where applicable."

5. AHOM1: Provision of Affordable Homes

"On-site Contributions. An on-site contribution towards affordable housing will be required on all market housing allocations and windfall sites of 10 or more homes to meet the affordable housing target set out in Policy SP5. The percentage target level for affordable housing is based on the scale of development: a) sites comprising 10-19 homes will be required to provide an affordable housing contribution of 10%; b) sites comprising 20 - 50 homes will be required to provide an affordable housing contribution of 12%; c) sites comprising 51-100 homes will be required to provide an affordable housing contribution of 20%; d) sites of 101 homes or more will be required to provide an affordable housing contribution of 25%

New paragraph number: The affordable housing target percentage noted within the policy is a target to be used as a starting point for affordable housing negotiations. New paragraph number: Where adjacent and related residential proposals result in combined numbers meeting or exceeding the above thresholds, the Council will seek an element of affordable housing based on applying the above target percentages to the aggregate number of dwellings. New paragraph number: Proposals will be required to ensure that the dwelling remains affordable for all subsequent occupants in perpetuity."

We believe that the current percentages above are insufficient and fail to contribute to alleviating the housing crisis that exists in the county and nationally. We recommend a percentage of 50% as a minimum.

Housing developments on a commercial level for developers are the remainder that will be for sale on the open market and attract more wealthy buyers who are at wage rates that are beyond the majority of the county's residents.

An influx of non-Welsh speakers will be the remainder, according to the patterns of moving to the county. This will contribute to a further decline in the Welsh language in the county which has already fallen to 39% where it was over 50% twenty years earlier. More robust measures must be in place to prevent further decline and seek to stabilise and revive the percentage of Welsh speakers in the county in line with Cymraeg 2050. When discussing the 2021 census in Carmarthenshire, the website Atlas y Gymraeg said:

"5,200 Welsh speakers were lost in the county between 2011 and 2021, after a similar loss of 5,800 between 2001 and 2011, which represents a reduction of 11,000 in 20 years."

All age groups, with the exception of young people aged 25 to 34 are showing a reduction, with the biggest losses being seen among those aged 35 to 64. These age groups now have the smallest percentages in the county, with only about a third of them able to speak Welsh. The proportion of people who are able to speak the language is rising among the elderly, to 36.0 per cent of people aged 65 to 74 and 45.0 per cent among those over 75."

<https://www.atlasgyymraeg.cymru/cy/siroedd/sir-gaerfyrddin>

6. AHOM2: Affordable Housing - Exceptions Sites

"New paragraph number: All new affordable local need housing will be restricted to those who can demonstrate they have a need to live in the Town and Community Council area and are in Affordable Housing Need. Reference is drawn to the Glossary of Terms which considers the Local Need Eligibility, and the criteria which must be satisfied to permit local need housing."

We support the new paragraph but also draw your attention to the following position set out by Jayne Bryant, former Cabinet Secretary for Local Government and Housing in correspondence with us dated the 17th of November 2025.

"local authorities under section 167 of the Housing Act 1996 are required to have a social housing allocation plan for setting priorities in the allocation of social housing. The legislation clearly sets out that there are 5 categories that should be given priority or reasonable priority while allocating social housing, within their social housing allocation plans, although it is at the discretion and design of the local authority as to how those discretionary groups are organised or prioritised within their individual plans. When deciding on their specific schemes, all local authorities in Wales must have regard to the Welsh Government's Code of Guidance for Local Authorities: Allocation of Accommodation and Homelessness along with their statutory obligations. However, alongside their allocation plans and in response to the local needs of their areas, local authorities may consider other specific descriptions of people to whom accommodation should be allocated as part of a local lettings policy that can be designed to allocate accommodation within a particular area of their local authority.

Section 167(2E) of the 1996 Act allows local authorities to allocate accommodation to people of a particular description, which may include language requirements, whether or not they fall within the reasonable preference categories, provided that the local authority is able to ensure that this does not dominate their allocation plan, and that preference should be given to ordinary people with a reasonable preference for whom the local authority has a statutory duty over those for whom they have no duty.

The policies should comply with the requirements of section 167 of the Housing Act 1996 and any other statutory duties, such as those under the Equality Act. Such policies must also be evidence-based, as well as assess and monitor the impact of equality to ensure they achieve the community sustainability they are intended to achieve."

Adopting a practical policy such as this would be a golden opportunity for the County Council to demonstrate a clear and firm commitment to seeking to protect and reinforce the language in a county that has seen the greatest decline in 20 years.

7. Strategic Policy – SP 8: Welsh Language and Culture

We welcome the policy and the following new paragraph

“Carmarthenshire in its entirety is considered an area of linguistic sensitivity. The 2021 Census indicates that 17.8% of the population can speak Welsh, whilst the correlating figure for Carmarthenshire stands at 39.9%. In terms of the geographical breakdown of the proportion of speakers across the County, this is lowest in the Tyisha Ward where 18.9% speak Welsh, and highest in Pontyberem where 60.7% speak Welsh. The proportion of Welsh speakers is higher than the national average across each ward in the County, and it is largely for this reason Carmarthenshire in its entirety is considered to be linguistically sensitive. Additionally, the most recent Census data has shown a substantial decrease in the number of Welsh speakers across the County illustrating the language’s vulnerability in Carmarthenshire.”

But it needs to be explained at the beginning of the first sentence that the national percentage who can speak Welsh is 17.8% as that is not clear. The last sentence confirms our previous comments and the only way to tackle a 'significant decline' is through a series of radical and far-reaching measures. Without that, the future of the Welsh language in Carmarthenshire will continue to lose ground.

It is also very likely that the Welsh Government will soon support and adopt the recommendations of the Commission for Welsh-speaking Communities' report (*"Empowering communities, strengthening the Welsh language"*) which includes designating areas of higher density linguistic significance. This will therefore be very relevant within your county which is already known as one linguistically sensitive area. Reference should also be made to recommendation 33: Local authorities and planning authorities should consider whether models can be developed, in terms of letting social housing or in compiling Section 106 Agreements, where the Welsh language could be one positive consideration, alongside other considerations. Any models developed should be scrutinised to ensure that there is no unacceptable disadvantage to the non-Welsh speaking population, and to ensure compliance with relevant equality legislation.

8. WL1: Welsh Language and New Developments

We object to the following new paragraph:

“Proposals for large scale housing development on large windfall sites which will individually or cumulatively exceed the annual windfall allowance within the Plan will be required to submit a Welsh Language Impact Assessment which will set out how the proposed development will protect, promote and enhance the Welsh language.”

We believe that a number of small scale housing developments when considered together across the county create a cluster that is very likely to have an impact on the language of the county's communities, particularly in small rural communities where the arrival of 5 new houses and 5 families changes the nature of that community. Given the *"significant reduction in the number of Welsh speakers across the County which*

shows the fragile nature of the language in Carmarthenshire" there is a real need to carry out an assessment of the impact on the Welsh language on all new housing developments of 5 or more units.

We oppose the deletion of the following paragraph...

"11.181 The Plan's Strategy provides for organic growth on a small scale within the Rural Villages and policies HOM1 and HOM3 build upon this allowing development of appropriate scale and in appropriate locations. It is considered that incremental development on this scale can make a positive contribution towards the sustainable growth of the Welsh language in rural communities, and any negative impacts are likely to be absorbed by the community. Unforeseen development of significant scale which is not allowed for in the Plan's policies may not be compatible with the Plan's Strategy, and their impacts are therefore unassessed and unknown. In the event that such proposals are presented for consideration, they will need to be accompanied by a full assessment of their likely effects upon the Welsh language."

The omission of this requirement further weakens the series of measures to protect Welsh as a community living language and no explanation is offered for its deletion. But the wording needs to be challenged as developments of this scale can also be negative and there is no guarantee that they can be absorbed by the community. The evidence of the last 3 censuses confirms that, and this underlines the need for this requirement to be retained in the LDP. Otherwise the statement is a subjective, illuminating, baseless and incorrect assertion.

As it currently stands, Strategic Policy – SP 8: Welsh Language and Culture is not sufficient or robust enough to withstand the impact of housing developments which will contribute to creating a further negative and adverse impact on the Welsh language in a county where linguistic vulnerability is endemic. As a result, the sentences *"Development proposals which have a detrimental impact on the vitality and viability of the Welsh language and culture will not be permitted unless the impact can be mitigated. All development proposals subject to WL1, will be expected to identify measures which enhance the interests of the Welsh language and culture."* are NOT factually correct.

9. VE3: Touring Caravan, Camping and Non-Permanent Alternative Camping Accommodation

"The following is to be added as a new paragraph between paragraph 11.254 and paragraph 11.255

The term "over concentration" in the context of this Policy refers to the proliferation of touring caravans, camping, and alternative non-permanent camping sites leading to adverse impacts on the character, function, and amenity of the locality. The number and density of similar facilities in the area should be considered as well as their pattern of distribution and whether the cumulative visual or environmental impacts detracts from the landscape, seascape or townscape character."

This will also have a negative impact on the Welsh language in communities and this needs to be recognised and added in the new wording. This is also true when discussing "*PSD7: Protection of Community Facilities.*" which only refers to "*damaging social texture.*"

10. Integrated Sustainability Appraisal (ISA) addendum to the MACs

Appendix B. ISA of New Policies

We object to every score change relating to PSD7 'Protection of Community Facilities' in respect of all of the points above where we have stated an objection.