*Thank you for the opportunity to respond to Carmarthenshire County Council's 2nd LDP and my comments are noted below. I am happy for my written comments to be considered by the Inspector but I do not wish to speak at a hearing session.*

*Councillor Meinir James*

*Llangyndeyrn Ward*

**SP1 Strategic Growth 8 Growth Options**

**SP8 Welsh Language and Culture**

8,822 is too high a number of houses in a relatively short period of time which will be very detrimental to the Welsh language in Carmarthenshire. There is also provision in the 2nd LDP for up to 9,704 new homes which poses a further threat to the Welsh language in terms of its continuity and its ability to thrive in our communities.

The Welsh Government's population growth projections estimate a much lower increase in population and overall more die than are born in Carmarthenshire. According to Welsh Government figures, in 2011 a population increase of 4100 was observed over 10 years.

Consideration should be given to what the requirements are in the communities, but a spatial option considers the land use rather than the impact of the land use on the people and the community.

The preferred option is also too ambitious in terms of the economy and it aims for far too rapid growth which will also greatly impact the Welsh language in the County's communities.

The Scheme identifies immigration as the main factor affecting population numbers in the County and young people are the largest number leaving the County. We need to keep our young people in the County to ensure the future and use of Welsh in our communities. We need affordable housing and housing at an attainable price for our young people to enable them to buy a house and stay in the County. Building a large number of large, expensive houses is out of reach for those who want to buy their first home.

Gradual and careful growth is needed to protect and develop our communities into viable communities. Many of the Welsh language strongholds are located in our villages and rural communities and the numbers of Welsh speakers need to be increased in these areas in particular.

A figure of 6500-7000 houses would be more realistic in terms of the provision needed with 45% of these being affordable housing, a percentage suggested in the National Development Framework 2040 (Welsh Government). This would provide almost 3000 affordable homes, which could include houses that the Council will buy as housing stock as well.

The Welsh Government's National Development Framework 2040 states that 23,400 houses will be needed in the Mid and South West Wales Region until 2039 and over the first 5 years 45% of these are required to be affordable housing. Carmarthenshire is part of this region which includes a population of over 900,00 and includes Neath Port Talbot and Swansea among the 8 areas within the region. 8,822 houses as set out in the second LDP is 37.7% of the total number of housing that is identified by the Welsh Government as being required within the region. This is neither realistic nor practical and reinforces that the figure of 8,822 is too high for Carmarthenshire.

We need to be ambitious for our communities and the continuation of the Welsh language in Carmarthenshire but we must ensure that the ambition is based on the relevant elements that will ensure thriving communities for the benefit of our residents. There is great concern that the total number of houses intended in the 2nd LDP is preventing the prosperity and continuation of Welsh as a community language in Carmarthenshire.

**SP8 Welsh Language and Culture**

**11.173**

The figures for the number of Welsh speakers in Carmarthenshire in the 2021 census have not been considered for the 2nd LDP and the figures from 2011 that have been used, are out of date. As the latest figures have shown a significant drop in the number of speakers within the County the 2nd LDP has far-reaching implications when considering the figures in detail. One should look not only at the total number of Welsh speakers, but also where the highest numbers of speakers are located in order to protect and develop the Welsh language in those communities.

Planning policies adopted within the 2nd LDP should enable the continuation and development of Welsh as a living language in all communities within the County, with particular attention given to the communities with the highest percentages of speakers in the 2021 census.

As numbers have decreased significantly within the County since the 2011 census, it is clear that the current planning policies are not sufficient for the continuation of Welsh as a viable language within the County. Robust policies are required to ensure that the Welsh language thrives in the County's communities.

The 2nd LDP must be revisited using 2021 Census figures to ensure that the LDP "promotes Welsh language and culture" (Carmarthenshire Well-being Objectives 2017-18) "and is also committed to contributing to the Welsh Government's long-term goal of achieving 1 million Welsh speakers by 2050" (Cymraeg 2050: A million Welsh speakers, Welsh Government 2017). The Well-being of Future Generations Act states "A Wales of vibrant culture and thriving Welsh language" and the figures from the latest census need to be upheld to ensure that Carmarthenshire is able to achieve that goal.

**WL1: Welsh Language and New Developments**

To ensure that our communities are locations "of thriving Welsh language", a Welsh Language Impact Assessment must be held for all developments of 5 or more houses in the 2nd LDP **including** the housing allocations included in the HOM1 and HOM3 policies. Every development is going to impact the Welsh language in the community.

The *Language* *Action Plan* is not sufficient for these developments or any development within the County, to ensure the continuity and growth of Welsh as a viable language in our communities. A Welsh Language Impact Assessment is required which is undertaken independently and externally at a similar scale and level as would be for any other assessment e.g. highways, NRW, conservation. The Welsh Language Impact Assessment must also be dealt with and discussed with the same status as the other statutory assessments. The importance of the Welsh language in the County's communities deserves to be considered at this level in order to reach the goals set out in Welsh Government legislations and in Carmarthenshire County Council's objectives and aims set out in Carmarthenshire's Wellbeing Objectives and the Welsh Language Strategy.

We need to be proactive to see the increase in the Welsh language that we desire for the benefit of our communities.

**SP5 Affordable Homes Strategy**

**AHOM1: Provision of Affordable Homes - On-site Contributions**

A conditional policy should be set that some of the affordable homes are to be built at the beginning of the development or at least as part of the first 5 or 10 houses in the development to ensure that the affordable homes are built unhindered in the long term.

It is conditional for a single dwelling to pay in part a Commuted Sum as the dwelling is built and a similar condition should also be part of an on-site contribution to affordable homes.

This will also enable an earlier response to the demand for affordable homes as the dwellings will be available at the beginning of development and without having to wait for development to be completed.

**SP11 The Visitor Economy**

**11.247**

For the benefit of our communities, and to ensure housing for local people and affordable homes for first home buyers, restrictions need to be placed on permitted development rights to change existing dwellings into holiday homes, second homes, and also temporary holiday accommodation such as Airbnb. A percentage of this type of homes allowed in a community needs to be set to ensure that community life continues throughout the year and that suitable homes are available to local people.

**SP16 Climate Change**

**Policy CCH3 – Electric Vehicle Charging Points**

**11.498/11.499/11.500**

It would be more suitable and cost-effective and sustainable to install 3-phase charging points in all new dwellings. This could enable the resident to use them for electric charging and heating pumps. This would also enable the occupant to use the latest technology when they need it e.g. not every resident will have an electric car at once and the EV electric charging point could rust and go to waste in the meantime.

It would also be better to assess local provision when allocating charging points in car park developments as there may be many charging points in the vicinity or if there are none the 10% required would need to be increased.

**11.495/11.497**

The public transport challenges and the diversity of requirements within Carmarthenshire communities offer an opportunity to promote community/shared electric car schemes and other new ideas that should be considered as options to meet the requirements.

**CCH6**

When facing the climate change crisis, more robust policy should be considered than *encouragement* and preference should be given to installing or enforcing the installation of solar panels, for example, on all houses in new developments particularly on all affordable homes. If the roof of the house faces south, west or east this is an option that would be cost effective on many levels as a relatively simple and effective solution to reduce carbon emissions. There are solar panels available that can be installed in the roof that would save spending on installing tiles on the roof.

**CCH7: Climate Change – Forest, Woodland, and Tree Planting**

While recognising the importance of planting trees and woodlands as responses to the climate crisis, schemes to buy local farms to achieve this undermine the policy. Options and schemes should be adopted for local farmers to use part of their land to plant the trees and woodlands.

This would ensure that the environment, cultural heritage, communities and landscape are protected and would ensure livelihoods to retain our young people in the countryside.

**4 Carmarthenshire – Strategic Context**

**Point 4.48 overview**

Whilst recognising the importance of the County's built heritage, this is a major challenge in the context of the climate change crisis, particularly in a town such as Llandovery where it is currently not possible to install renewable energy such as solar panels on town buildings. It's also not a suitable area for wind turbines and that poses the town a particular challenge to be sustainable.

In light of the climate change crisis, these kind of situations need to be resolved and there needs to be flexibility as solar panels, for example, are a temporary installation and do not impair the structure of the buildings.