

SECOND REVISED LOCAL DEVELOPMENT PLAN 2018 - 2033

CYNGOR SIR GÂR

RESPONSE TO PUBLIC CONSULTATION March/April 2023

This document attempts to measure the aims of the LDP against the specific proposals as regards RURAL DEVELOPMENT, SUSTAINABLE RURAL COMMUNITIES and the WELSH LANGUAGE.

It is compiled from the point of view of Local Members who attempt to build strong rural communities within the limitations presented in the Local Development Plan and the the Planning environment.

Critical issues faced by rural communities at this time include:

- De-population – loss of young people, leading to loss of young families, leading to loss of generation of children and further young people – a cycle which rural communities cannot control nor influence;
- Altered demographic – increasing purchase and occupation of residential dwellings by older couples or individuals, either retired or preparing for retirement, both local and from afar – ultimately leading to “retirement villages”;
- Market forces – demand of older generations who have the means to purchase a rural lifestyle pushing property prices beyond the reach of younger working families;
- Media marketing – “lifestyle” programming on TV and other media encouraging urban dwellers to aspire to idyllic rural locations thus squeezing local lower earners from access to the local market;
- Tourism – economic considerations from the (sporadic) visitor industry is prioritised above the economic contribution of (permanent) rural residential working families;
- Yr Iaith Gymraeg – Planning Statements placing the Welsh Language in a priority position while Planning Policy failing to protect or develop Welsh Language rural strongholds;
- Community – traditional rural community structures breaking due to fragmented demographic, contrasting cultures and consequential loss of cultural heritage;
- Community Services – lack of young families stepping into and running the voluntary community services such as sports clubs, PTAs, Church/Chapel groups, social events etc.;
- The Family – breakdown of “family care cycle”. While young families are not living near their parents, care of the elderly by the younger generation and childcare by the older generation cannot be provided, resulting in isolation and additional pressures on Care Services.
- Local Culture – not necessarily being recognised or acknowledged by new demographic. Absence of younger generation to inherit and exercise local culture and tradition resulting in their demise and disappearance.

How can the LDP support ordinary people in ordinary rural communities to develop their economy, language and culture?

TAN 6: 2.1.2 *“Planning authorities should assess the needs and priorities of rural communities. They should interrogate published sources of information such as the Wales Rural Observatory, and if necessary commission research to identify rural economic and social conditions and needs.”*

The **Wales Rural Observatory** ceased to exist in 2014. The most recent report on rural communities was published in 2013. Many of the issues above were identified at that time:

“A common concern ... was that disproportionately high housing prices, fuelled by demand for commuting, second homes, holiday homes and retirement accommodation, was taking owner occupation beyond the reach of many people resulting in young people and young families being driven out of the communities where they worked or had grown up.”

Ten years later, however, these issues remain unaddressed in national and local policies.

As recommended, Carmarthenshire County Council has commissioned its own research to identify rural needs:

MOVING RURAL CARMARTHESHIRE FORWARD – Report and Recommendations of the Carmarthenshire Rural Affairs Task Group – June 2019:

“As a local authority we cannot directly influence decisions that are made in Cardiff, London and Brussels but we can strongly urge our representatives to do whatever they can to safeguard the future of rural Carmarthenshire and rural Wales. This is essential so that future generations can live, work and spend their leisure time in communities where valued traditions can be maintained, but are also resilient enough to adapt to an ever-changing social and economic landscape. This report seeks to encapsulate that crucial balance between preservation and progression.”

There is a disconnect between the recommendations in the MOVING RURAL CARMARTHESHIRE FORWARD report – supporting the efforts of local people to maintain and develop rural communities – and the inflexibility of the planning framework.

OBSERVATIONS AND CONSIDERATIONS ON SPECIFIC ASPECTS OF THE LDP

(A number of observations and considerations are common to more than one Strategic Policy)

LDP: HOM3 - Homes in Rural Villages

11.90 This part of the Plan's rural policy framework seeks to establish a flexible but controlled approach to the delivery of new homes within those (Rural Villages) settlements. The Plan utilises a criteria-based assessment to define small scale housing opportunities in rural villages and to meet the need for new homes in rural parts of Carmarthenshire at a scale and at locations which maintain the essential character of the countryside.

PPW Housing 4.2.1: *Planning authorities must understand all aspects of the housing market in their areas, which will include the requirement, supply and delivery of housing. This will allow planning authorities to develop evidence-based market and affordable housing policies in their development plans and make informed development management decisions that focus on the creation and enhancement of Sustainable Places.*

TAN 2.2.1: *Many rural communities can accommodate development, particularly to meet local needs. New development can help to generate wealth to support local services, ensuring that communities are sustainable in the long term. A key question for the planning authority, when identifying sites in the development plan or determining planning applications, is whether the proposed development enhances or decreases the sustainability of the community. In particular, planning authorities should support developments that would help to achieve a better balance between housing and employment, encouraging people to live and work in the same locality.*

Observations:

- **The policies exert much *control* but very little *flexibility* within rural settlements.**
- **The “character of the countryside” is not defined in planning terms. It seems to refer to the appearance of the countryside while it should, in fact, refer to all aspects of rural life. It is the biodiversity, the nature, the traditions and, primarily, the local knowledge of the history and culture of that part of the countryside which forms the *character*.**
- **If we lose the local residents then we lose that knowledge and protection.**

- The *criteria-based assessment* prioritises maintaining the character of the countryside above maintaining a local community.
- The policies fail to recognise the contribution of the local community to maintaining the *character of the countryside* through its knowledge, traditions and protective practices.

CONSIDERATIONS:

- To apply additional flexibility to policies for rural villages to allow the needs of the community to be met.
- To acknowledge the role of village residents in the enhancement and protection of the “character of the countryside”.
- To measure the contribution a development makes to the well-being of the community as opposed to considering only the perceived potential harm.
- To assess and recognise the scale of development required in rural villages to secure their future as community strongholds.

LDP: HOM3 - Guidance on Acceptable Plots

Infill sites within these rural villages will take priority over other locations;

Where appropriate, sites adjoining a rural village are also acceptable. Such sites will be required to adjoin the boundary of one property which forms part of the rural village group. All proposals which adjoin a group (as opposed to infill sites) will be required to demonstrate the following:

- *there is an existing physical or visual feature which provides a boundary for the group - reducing pressure for unacceptable ribbon development or rural sprawl;*
- *where such a feature does not exist, there should be potential for such a feature to be provided so long as it is in character with the scale and appearance of the group;*
- *Proposals located in open fields adjoining a group, which have no physical features to provide containment will not be considered acceptable.*

Observations:

- While infill sites should take priority over other locations, this should not exclude other locations.
- These rigid limitations appear logical in theory, but they are not practical in many rural settlements.
- The limitations do not take into account variances in our local topography.

CONSIDERATIONS:

1. To consider further potential development capacity in and around rural villages.
2. To apply rounding-off of boundaries to include capacity which logically allows sensitive development.
3. To evidence actual harm against the potential for community benefit in setting and respecting development boundaries.

LDP: HOM3 - Housing within development limits

Proposals which exceed the 10% cap above the number of existing homes in the settlement, as at the LDP base date, will not be permitted except where they conform to Policy AHOM1 in relation to the provision of affordable homes.

Observations:

- A settlement of 100 houses may only grow by 10 homes during the life of the LDP.
- A hamlet of 10 homes may only grow by 1 home during the life of the LDP.
- The rigidity of the 10% cap is not sympathetic to the aspiration to build sustainable rural communities.

- While an exception is provided for Affordable Housing, the needs of a community may also include market housing such as bungalows, “downsize” accommodation and dwellings to fit growing families.
- If the linguistic and cultural vitality of rural villages is encouraged to grow from the inside, then rigid caps are not appropriate.

CONSIDERATIONS:

1. To measure each application for a residential dwelling on its merits in the context of its community, not only the context of development boundaries.
2. To assess the potential for development within or bordering the development limits in the context of the particular settlement, and provide flexibility of boundaries where the geography/topography does not allow expansion.
3. To provide for exceptions where affordable/local needs housing cannot be accommodated within or bordering the development limits.
4. To consider the need for market housing to meet the needs of those who will not qualify for Affordable Housing.
5. To remove the 10% cap above the number of existing homes in the settlement.

LDP: HOM4: Homes in Non-Defined Rural Settlements

Proposals for new single homes in settlements, hamlets and groups of dwellings which are not identified under Strategic Policy SP3 will be permitted where they meet a local need for affordable housing and conform to the following:

- *It represents sensitive infill development of a small gap within an otherwise continuous built-up frontage; or, is an appropriate rounding off of the development pattern;*
- *The development is of a scale that is consistent with the character of the area;*
- *The proposal will not result in an intrusive development in the landscape, and will not introduce a fragmented development pattern;*
- *The size of the property reflects the specific need for an affordable dwelling in terms of the size of the house and the number of bedrooms;*
- *That the occupancy of the dwelling is restricted both on first occupation and in perpetuity to those who have a need for an affordable dwelling.*

11.93 *There are a notable number of small settlements or groups of dwellings throughout the County which have not been defined within the settlement framework, and as such do not have development limits.*

11.94 *It is also noted that such provision needs to be delivered within the backdrop of a national agenda centred on sustainability with placemaking at its heart. In this respect reference is made to the provisions of PPW Ed.11 which requires that all residential development away from existing settlements or centres be strictly controlled. The policy therefore in reflecting the provisions of national policy restricts local affordable need dwellings in rural areas to established groups of dwellings.*

PPW Strategic Placemaking 3.44: *Consideration should be given to whether specific interventions from the public and/or private sector, such as regeneration strategies or funding, are required to help deliver the strategy and specific development proposals.*

PPW Development in the Countryside 3.60: *Development in the countryside should be located within and adjoining those settlements where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation. Infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity. However, new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled.*

PPW Housing Delivery 4.2.24: *In the open countryside, away from established settlements recognised in development plans or away from other areas allocated for development, the fact that a single house on a particular site would be unobtrusive is not, by itself, a good argument in favour of permission; such permissions could be granted too often, to the overall detriment of the character of an area.*

11.95 *Whilst the Revised LDP is supported by a robust evidence base it is acknowledged that details of housing need changes over time. Affordable housing proposals will be required to submit evidence demonstrating the specific local need and ensure that the proposal provides for the size, type and tenure of houses required. Proposals to meet speculative local need application will not be considered, rather they should relate to an identified need from individuals/families within the specific area.*

11.96 *Where available, local housing needs surveys should be utilised in providing this evidence. Alternatively, other forms of evidence may be considered appropriate including Strategic Housing Market Area Assessments and local needs/Lettings registers.*

Observations:

- Each regulation is based on geography and existing development patterns. The “protection” of the settlement image takes priority over the actual needs of local people.
- There is no provision at all for dwellings which are not Affordable Housing. Not all local people need Affordable Housing, but they have Local Housing Needs for a variety of reasons.
- Small Settlements or Groups of Dwellings are common in our rural countryside. While needing to be “controlled”, exceptions should be possible where there is evidenced local need.
- Such exceptions should not be limited to Affordable Housing as many mature members of the community do not qualify. Older members of the community have a strong need to remain in their community for reasons of health, mental health and social interaction.
- Box-ticking to qualify for Local Needs does not always allow local people to express their unique needs or to argue their case outside the specific requirements.
- While Local Needs/Letting registers may confirm the needs of young families seeking housing, many members of the community who have local needs are excluded from housing registers.
- Retiring local farmers or other rural workers will not qualify for Affordable Housing in their life-long community. No provision is possible for families or individuals who need to stay within their support network in Non-Defined Rural Settlements.

CONSIDERATIONS:

1. To prioritise the needs of the people and the community over the visual or conceptual image of the settlement.
2. To use the actual housing needs of applicants to drive the policy, not devise a policy which excludes the very housing needs it is intended to address.
3. To provide some capacity with the policy for those who do not qualify for Affordable Housing but whose needs are equally important.
4. To define what “too often” means in granting permissions in the open countryside, and consider the local needs of individuals above non-defined caps.
5. To consider the need within the community for young families, not only the need of a family to live in a location.
6. To provide a needs-assessment which is not exclusively a “box-ticking” exercise.
7. To prioritise matching the needs of individuals with the needs of the community over reducing numbers on Housing Registers.

LDP: AHOM2 - Affordable Housing - Exceptions Sites

Proposals for 100% affordable housing development on sites adjoining the Development Limits of defined settlements (Tiers 1-3 in Policy SP3), will, in exceptional circumstances be permitted where it is to meet a genuine identified local need (as defined within the Glossary of Terms) and where:

- The site represents a logical extension to the development limits and is of a scale appropriate, and in keeping with the character of the settlement;
- The benefits of the initial affordability will be retained for all subsequent occupants;
- It is of a size, scale and design compatible with an affordable dwelling and available to low or moderate income groups;
- There are no market housing schemes within the settlement, or projected to be available which include a requirement for affordable housing.

TAN 6: 2.2.4: They (planners) should also ensure that any sites identified for development are effectively available and likely to be brought forward for development by the owner. This is particularly important in smaller settlements, where a limited number of landowners may control land supply

TAN 2: 10.12: It is important that there is adequate housing provision in rural areas to meet the needs of local people and to contribute to the delivery of sustainable communities. Development plans must set out how planning at the local level will contribute to meeting identified rural affordable housing needs.

TAN 2: 10.16 Local planning authorities must set out in their development plan their definition of 'local need' for affordable housing in rural areas, within the overall aim of contributing to the delivery of sustainable communities. This can include:

- existing households needing separate accommodation in the area;
- people whose work provides essential services and who need to live closer to the local community;
- people with a family connection or long standing links with the local community; and
- people with a job offer in the locality who require affordable housing.

For some of these categories the area within which needs will be considered 'local' must also be defined in the development plan. This may include:

- the village or group of villages;
- the community council area;
- an electoral ward or group of wards;
- the local authority area.

TAN 2: 10.14 Rural exception sites are not appropriate for market housing.

11.124 An affordable dwelling must be compatible with WG's Design Quality Requirement standards to limit its size, scale and design to ensure that the dwelling falls within a reasonable and acceptable affordable dwelling cost for future occupants. In exceptional circumstances, a departure from these standards may be considered appropriate where they are to meet the occupant's needs and are clearly evidenced and justified.

Observations:

- Availability of land dictates the potential for Exception Sites.
- While Exception Sites provide the potential for Affordable Housing adjoining Local Development boundaries, this may not be possible in many rural villages.
- The topography of our area does not always permit development outside existing settlements and steep gradients make affordable construction unviable.
- Where land may be available, other factors may not meet requirements such as Highways, SAB assessments etc. thus limiting the potential for development.
- Non-availability of land in and around Defined and Non-Defined Rural Settlements results in no housing to meet local needs.

- There are natural boundaries between communities which dictate social interaction. A nearby community, across a river or motorway, may be more alien to a local individual than a town twenty miles further afield.
- There is no provision at all for market housing in many rural settlements. If you don't qualify for Local Needs, or there is no Local Needs capacity in your community – you can't live there.
- The size, scale and design of Affordable Housing cannot accommodate a growing family, especially where children are not all of the same gender and vary in age.
- "Exceptional Circumstances" may not be so exceptional. Some quite ordinary circumstances exclude local people from qualifying for Local Need.
- Young families wishing to return to their area to bring up their children and who have owned a home in another area will not qualify for Affordable Housing, but cannot afford open market housing.
- There is no guidance on what constitutes an "exception". The policy accommodates nuclear families with 2.4 children. There is no provision for Blended Families whose needs are more varied and extensive.

CONSIDERATIONS:

1. To acknowledge that Exception Sites are at the discretion of local landowners, access/highways restrictions, SAB requirements and other limiting factors.
2. Where no Exception Sites can be identified, to exercise flexibility in considering alternative sites which may deviate from the current permitted sites.
3. Where particular individual "locality" needs are identified, to consider applications for non-affordable housing development in the interest of the individual, the family and the community.
4. To consider the definition of "local" in the context of the individual and the community rather than by a radius of concentric miles.
5. To assess the needs of growing families when calculating the size, scale and design of Affordable Housing in order to provide long-term security and a decent quality of life.
6. To acknowledge the housing aspirations of young families in rural areas as a material planning consideration.

LDP: EME4 - Employment Proposals on Non-Allocated Sites

Proposals for employment development on non-allocated sites, but within the development limits of a defined settlement will be permitted where:

- *it is demonstrated that no other suitable existing or allocated employment sites or previously developed land can reasonably accommodate the proposal;*
- *the development proposals are of an appropriate scale and form, and are not detrimental to the respective character and appearance of the townscape/ landscape;*
- *The development is compatible with its location and with neighbouring uses.*

Employment proposals outside the development limits of a defined settlement (Policy SP3) will be permitted where:

- *The proposal is directly related to a settlement or hamlet; or*
- *The proposal is supported by a business case which demonstrates that its location is justified; and*
- *The proposal is of an appropriate scale, size and design.*

11.165 *For proposals outside the development limits of a defined settlement, they must show that they are directly related to a settlement or hamlet, or supported by a business case which justifies its location. The Plan recognises that small-scale enterprises have a vital role to play in the rural economy and contribute to both local and national competitiveness and prosperity. Many commercial and light manufacturing activities can be appropriately located in rural areas without causing unacceptable disturbance or other adverse effects. In this respect, the development of small businesses would address any local need for employment accommodation.*

PPW: The Rural Economy 5.6.4 *To unlock the full potential of rural areas, planning authorities should adopt a positive approach to employment arising from foundation and innovative and technology based sectors, including research and development, in addition to employment arising from the traditional agriculture, forestry and leisure sectors. Proposals for diversification, new startups and micro-businesses should also be encouraged, where appropriate, to generate new job and wealth-creating opportunities.*

TAN 6: 2.2.2: *Development plans should define local need taking into account the social, economic and environmental characteristics of the area. Where possible existing definitions of local need, for example affordable housing to meet local need, should be adopted, or if necessary modified to include other land uses.*

Observations:

- There is no connection provided between Employment on Non-allocated Sites and the needs of rural villages to remain sustainable. Living and working within the community is vital to its existence.
- Some capacity has to be provided to acknowledge the place of small-scale businesses within rural communities. There is no provision for small-scale commercial enterprises.
- The increase in home-working needs to be supported by flexibility across all genres of employment. Additional space may be needed – inside and outside development limits – to accommodate future working practices.
- This will be mitigated by reduction in travel and healthier work-life balances, thus meeting the aims of our well-being goals.

CONSIDERATIONS:

1. To apply flexibility in meeting the needs of local people to work within their community.
2. To provide working spaces which accommodate local employment in areas outside or without development limits.
3. To encourage satellite working as and when technology permits during the lifetime of the LDP.

LDP: SP 8 - Welsh Language and Culture

The Plan supports development proposals which safeguard, promote and enhance the interests of the Welsh language and culture in the County. 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.

11.174 *The Plan seeks to 'promote the Welsh language and culture'[59] and is committed to contributing to the Welsh Government's long-term aim of achieving 1 million Welsh speakers by 2050[60]. To deliver on this aim, the Council will support, promote, and enhance the Welsh language as a viable community language by ensuring that there are sufficient and proportionate employment and housing opportunities to sustain both the rural and urban communities in the County and by implementing an effective monitoring framework. In doing so, the Plan seeks to ensure that the local population have the opportunity to remain in Carmarthenshire rather than leave in search of work opportunities and housing, as well as the opportunity to return. Through aiming for sustainable growth, the Plan will also maximise opportunities for non-Welsh speakers who move to the County to be integrated into community life at a scale and pace that will not undermine the vitality and viability of the Welsh language and culture.*

11.177 *The Plan also seeks to safeguard, promote, and enhance the Welsh language in Carmarthenshire through other relevant policy objectives, namely through the provision of housing and affordable housing, promoting a vibrant economy and employment opportunities and the provision and retention of community facilities, amongst others.*

TAN 20: 1.4.8 Section 70(2) of the Town and Country Planning Act 1992 (TCPA) clarifies that considerations relating to the use of the Welsh language may be taken into account when determining applications for planning permission, so far as they are material to the application. This may apply to any application in any part of Wales. This provision does not give any additional weight to the Welsh language above any other material consideration.

LDP: WL1 - Welsh Language and New Developments

All development proposals throughout Carmarthenshire will be required to safeguard, promote and enhance the Welsh language ... Proposals which do not accord with the Plan's housing trajectory will be required to provide a phasing plan outlining the timescales for delivering the homes proposed on the site and demonstrate that they would not have a negative impact upon the Welsh language which cannot be mitigated.

11.178 The Welsh Language Action Plan sets out the measures to be taken to safeguard, promote and enhance the Welsh language. The Welsh Language Action Plan should also outline how the development proposes to make a positive contribution towards the community's Welsh language groups. This could, amongst others, include providing support and funding towards organisations and bodies that provide activities, facilities and education for Welsh speakers and learners, and support and funding towards Welsh language classes. Welsh Language Impact Assessments (WLIA) will be required to outline the anticipated impacts of the proposed development upon the Welsh language in the County. The Welsh Language Supplementary Planning Guidance[61] provides further guidance on when a WLIA is required, clarifying what constitutes a large scale development, as well as how to produce a WLIA.

11.182 The ISA of the LDP is required to assess the likely effects of the LDP upon the Welsh language. This is done iteratively at key stages throughout the Plan's production. The likely anticipated effects are presented in the ISA report, and further information is available within the LDP's evidence base.

TAN 20: 3.3.2 Evidence from the language impact assessment may be material to the application and may inform whether measures to mitigate or enhance the impacts of the development on the use of the Welsh language should be applied.

Welsh Language County Strategic Forum: "Language planning work within the LDP process, particularly the development of a new methodology to measure the impact of land use on the Welsh language" notes a "Lack of national guidance and dependable information on the impact of construction on the Welsh language in terms of numbers of permitted locations for house building and their geographical locations."

Carmarthenshire Welsh Language Promotion Strategy 2023 – 2028: p.7 Despite the positive contribution of all the above policies, a number of factors that most adversely affect the Welsh language in Carmarthenshire remain outside their scope. The affordability of housing for local young people for example is largely influenced by the open market and private sector profits. The same is true with regard to the influx of older people from outside Wales into Welsh-speaking communities. After the first Strategy's efforts to work with estate agents to try to gain useful information to address this problem, it must be recognised that it is only Welsh Government who are in a position to meaningfully influence these factors. We look forward to working together on innovative efforts by the government in this area of work and to explore new law-making forces that could mitigate harmful effects on the Welsh language.

Welsh Government: CYMRAEG 2050: a Million Welsh Speakers: Development and the Welsh language - p.63: The land use planning system should contribute to the vitality of the Welsh language by creating suitable conditions for thriving, sustainable communities, supported by an awareness of the relevant principles of language planning. Decisions regarding the type, scale and exact location of developments within a specific community has the potential to have an effect on language use, and as a result on the sustainability and vitality of the language. This calls for strengthening the relationship between language planning and land use planning.

Cyngor Sir Gâr: Notice of Motion 10.7.2019 (unanimously supported): *“This council believes that the whole of Carmarthenshire is an ‘area of linguistic sensitivity and significance’ and that the planning system has a crucial role to play in supporting the Welsh language across the county. To this end, we believe that the language should be a Material Planning Consideration in all applications for the development of five or more houses in rural areas and ten or more in urban areas in every community, irrespective of the percentage of Welsh speakers.*

Observations:

- Cyngor Sir Gâr’s Notice of Motion identifies the whole county as an area of linguistic sensitivity and as such should be recognised as a positive material consideration in rural areas.
- In reality, the Plan does not acknowledge the importance of small rural communities in its safeguarding and enhancement of the Welsh Language. Many of our rural villages are the strongholds of first-language Welsh-speakers and form the foundation of Welsh language and culture throughout the county. Welsh speakers are concentrated in these areas, but the ability of young families to live and work within these communities is limited by the Plan and other regulatory factors.
- The Plan addresses two aspects of Welsh-language safeguarding:
 - a) It requires assessments on the impact of developments on the Welsh language;
 - b) It provides for activities, facilities and education which promote the Welsh language;
- The Plan does not provide for sensitive development within the small community strongholds of the language. Welsh-speakers who cannot build or buy within their villages, or in the surrounding areas, cannot support the language in their native communities.
- Local people may have access to land which would reduce costs and make the building of their own home viable. Proportionate development on private land should be made possible where appropriate.
- Rural Welsh-language villages need proactive policies to offer accommodation in the community – both to young families in need of Affordable Housing and to those requiring market housing.
- Assessments of the likely effects of the LDP on the Welsh language will depend on the detail available and be data-led.
- Pre-planning Welsh-language Assessments are appropriate for larger developments in service centres and towns, however, external assessments do not evidence the actual prosperity of the language in small villages and communities.
- Welsh-language impact assessments are commissioned by the applicant and may not always be independent.
- A reversal of thought is required so that the needs of the Welsh language influences the LDP rather than the LDP attempting to react to perceived needs.
- The data on Welsh-speakers in Carmarthenshire has not yet been based on the 2021 Census and is out of date.
- There is very little planning guidance attached to the Welsh Government policy to achieve one million Welsh speakers by 2050.
- While the CYMRAEG 2050 policy calls for strengthening the relationship between language planning and land use planning, Welsh Government’s own planning policies make this impossible.

CONSIDERATIONS:

1. To recognise the Linguistic Sensitivity of the whole county and the potential of rural communities to increase the number of Welsh-speakers if supported proactively through the LDP.
2. To move from assessing impact to providing positive measures to develop Welsh-language strongholds.
3. To acknowledge that strict controls on market housing in rural areas harms Welsh-language communities.
4. Where development is evidenced through local need, to balance the potential visual harm to rural areas against the potential benefit to language and culture.

5. To provide a body to conduct Welsh-language impact assessments which is independent of the applicant and the Local Planning Authority.
6. To re-assess Welsh-language impact policies as soon as the 2021 Census data is available.
7. To recognise the need for Welsh Government to explore new approaches to planning in rural areas in order to enable local Welsh Language Strategies to be implemented and to enable CYMRAEG 2050 to be a realistic possibility.

LDP: SP11 - The Visitor Economy: *Respecting the County's social, economic and environmental fabric.*

11.234 All parts of the County possess qualities that contribute to the overall sense of place. These include landscape, nature conservation, social fabric and built environment. These are assets which must be protected for our future generations and cannot be unduly compromised by tourism related development.

11.235 There should also be an emphasis on providing quality in all aspects of a proposal. In considering the acceptability of proposals, consideration will be given to location, siting, design and scale, access to the primary and core highway network and the impact of any resultant traffic generation. Furthermore, the extent to which the site is serviceable by public transport, walking and cycling are important considerations. Proposals should reflect the character and appearance of the area with appropriate landscaping and screening utilised as required.

11.239 The County's rural areas are well placed to accommodate proposals for high quality and sustainable proposals that are of an appropriate scale. Proposals should respect the County's assets whilst supporting vibrant rural communities.

11.240 Some tourism related developments, by their very nature, must be located in the countryside. It is important that these developments do not have any significant negative impact on the landscape, natural environment, or amenity. In terms of the detailed policies for the Revised LDP, the emphasis is on providing clarification on the two notable challenges and opportunities facing the visitor economy in Carmarthenshire which are attractions (somewhere to go) and accommodation (somewhere to stay).

LDP: VE2 - Holiday Accommodation

Proposals for high quality serviced accommodation, including appropriate extensions to existing accommodation, will be permitted where they are located within, or directly related to a defined settlement (Policy SP3).

Proposals for serviced and self-catering accommodation that are located outside of the above locations will only be permitted where they consist of the re-use and adaptation (including conversion) of existing buildings in conjunction with policy RD4.

All proposals set out above should reflect and respect the role and function and sense of place of the area, most notably in terms of scale, type, character, design, layout and appearance - as well as those uses already located in the vicinity of the site.

11.247 Where planning permission is given for permanent holiday accommodation, the Council will consider the attachment of conditions restricting the use to holiday accommodation only. Seasonal occupancy conditions may also be used to prevent the permanent residential occupation of such accommodation. In addition, in areas where the prevalence of second homes and holiday homes are known to be a serious issue within communities, the Council will consider placing restrictions upon permitted development rights to change existing dwellings to holiday homes and second homes.

LDP: VE4 - Static Caravan and Chalet Sites and Permanent Alternative Camping Accommodation:

Proposals for new Static Caravan and Chalet Sites will be permitted where:

- they are within or directly related to a defined settlement (Policy SP3), or, they are located or demonstrate a spatial and functional relationship with a relevant existing tourism facility or attraction;
- they are of high quality in terms of design, layout and appearance, and will not have an unacceptable adverse effect upon the surrounding landscape and/or townscape;

- they will not lead to a significant and unacceptable intensification in the provision of sites in the locality;

Proposals for the enhancement and extension of existing sites will be permitted where:

- it will increase the vitality, sustainability and environmental quality of the site;
- it will not result in an unacceptable increase in the density of units and/or the overall scale of the site.
- it will not have an unacceptable harm on the surrounding landscape, seascape and / or townscape;
- it provides (where appropriate) for the significant improvement of the overall quality, appearance and setting of the site.

11.256 This policy recognises that appropriate high-quality proposals should be supported. This recognises the need to provide a diverse accommodation offer in terms of providing a range and choice of places to stay within the County.

TAN13: TOURISM – Published in 1997, this document is woefully inadequate to address the needs of accommodating visitors in 2023 and the future.

Observations:

- *“The County’s rural areas are well placed to accommodate proposals for high quality and sustainable proposals that are of an appropriate scale”* suggests that tourism developments take priority over residential developments. Nowhere does the Plan refer to residential development located in the countryside in such positive terms, but tourism is accommodated with flexibility.
- The re-use and adaptation (including conversion) of existing buildings outside a settlement is permitted for visitor accommodation but not for housing for local people.
- No evidence is provided to illustrate why holiday accommodation is considered to have less impact on the countryside than residential dwellings. This in no way suggests that there be should be competition between both uses, but it is not clear how holiday accommodation makes a greater contribution to sustainable communities than housing for local people.
- A *“spatial and functional relationship with a relevant existing tourism facility or attraction”* includes the open countryside. If static Caravans and Glamping Pods are of a scale, layout and design appropriate to the setting, and if properly screened, such developments provide diversification income to rural areas while providing much needed visitor accommodation.
- The rigidity of travel planning restrictions where public transport is not readily available bars much unintrusive development.
- While Static Caravan, Chalet and Glamping Pod Sites in rural areas are subject to rigid planning regulation, the ownership and use of these units as second homes prevents the purchase of residential family dwellings for holiday purposes. This helps protect traditional rural homes from second home use, while purchasing a chalet on a park is far less costly as a second home than purchasing a house.

CONSIDERATIONS:

1. To question if the visitor economy is prioritised over local needs, and consider both community benefits on equal terms.
2. In light of the recent policy on Second Homes/Holiday Homes Council Tax Premium, to consider permitting residential use of existing holiday accommodation in the open countryside which may no longer remain viable.
3. To recognise that small, well-designed accommodation sites in the open countryside provide diversification opportunities to farming communities and contribute to the local economy.
4. To encourage well-sited Static Caravan, Chalet and Glamping Pod Sites in areas heavily affected by second home use as an attractive option to potential second home purchasers.
5. To provide a balance of residential and tourism accommodation in rural areas to encourage mutual support between communities and visitor economy.
6. To replace TAN13 with guidance which is appropriate and relevant to the life of the Plan.

LDP: SP 12 - Placemaking and Sustainable Places

11.269 *The Act means that public bodies such as local authorities must work to ensure that developments should acknowledge and seek to improve the economic, social, environmental, and cultural well-being of an area.*

Observations:

- **With regards to social and cultural well-being, there is no provision for placing small rural communities at the centre of policy, or for building the policies around the needs of village communities.**

CONSIDERATIONS:

- 1. To recognise the place of small communities in achieving the aims of the Well-being and Future Generations Act.**
- 2. To allow rural communities to improve and grow on a par with urban communities.**

LDP: SP 13 - Rural Development

11.366 *The rural settlements of the County have an important role to play in improving the sustainability of the wider geographical area in which they are located as well as the County's overall sustainability. The Plan's strategy and settlement hierarchy reflects the significant role which the rural communities play through supporting growth of a proportionate scale which can make a positive contribution towards the long-term sustainability of the rural economy and rural communities.*

11.367 *Proportionate and sensitive development can provide the level of growth required to retain and enhance the services and facilities provided in the County's rural settlements. It can also serve to safeguard and promote the Welsh language in rural areas and enhance rural employment opportunities. However, the Plan seeks to ensure that development and growth does not have negative impacts upon a community's sustainability. Key to this is ensuring that development is not permitted at a scale or rate which would affect the community's ability to absorb and adapt to growth and change. This is imperative when considering the impacts which development can have upon the local infrastructure, the vitality of the Welsh language and the sustainability of the countryside and natural environment.*

11.368 *National planning policy has historically sought to restrict unnecessary development in countryside locations, principally to prevent sporadic and unsustainable growth and to maximise use of infrastructure, resources and services more commonly available in established urban areas.*

11.369 *Whilst this principle remains relevant and applicable, there is an enhanced recognition of the countryside as a place of work, as a home for many, a place to visit for others and a vital ecosystem for everyone. The Plan is committed to addressing and safeguarding the needs of rural communities. To this end, the Council established a Rural Affairs Task Group with the aim of assessing the needs of rural communities and taking positive steps to address these. This Plan supports the aims and outcomes from the Task Group principally through policies relating to the provision of housing and affordable housing; the economy and employment; the Welsh language, and the natural environment. Development proposals will need to demonstrate that they accord with these policies as well as the provisions of national planning policy.*

PPW: Placemaking in Rural Areas 3.38: *The countryside is a dynamic and multi-purpose resource. In line with sustainable development and the national planning principles and in contributing towards placemaking outcomes, it must be conserved and, where possible, enhanced for the sake of its ecological, geological, physiographic, historical, archaeological, cultural and agricultural value and for its landscape and natural resources. The need to conserve these attributes should be balanced against the economic, social and recreational needs of local communities and visitors. Fostering adaptability and resilience will be a key aim for rural places in the face of the considerable challenge of maintaining the vibrancy of communities and availability of services as well as contributing to the Cohesive Communities well-being goal.*

11.373 This understanding of diversity is reflected within PPW in its consideration of sustainable transport requirements. It recognises there is a need to reflect different approaches to sustainable transport in defining growth within rural settlements.

TAN 6: 2.2.3 Where development proposals are intended to meet local needs, planning authorities should recognise that a site may be acceptable even though it may not be accessible other than by the private car. Development not intended to cater primarily for local needs should continue to be located in market towns, local service centres or clusters of smaller settlements where a sustainable functional linkage can be demonstrated and which are accessible by public transport.

Observations:

- “The Plan is committed to addressing and safeguarding the needs of rural communities” - the Plan does not address the needs of rural communities.
- The Rural Affairs Task Group states that:
“There is of course a recognition of the need for sensitive consideration of a number of factors when looking at development in rural areas but the Task Group feels that current planning policy from Welsh Government does not give enough flexibility to enable development, based on local need, in our most rural communities.”
- While the preservation of the countryside is important, the policy “moth-balls” rural villages as static entities and “enhances” them by keeping them attractive to visit and view. The policies invite people to observe the attractive characteristics – culture, tradition, Welsh-language without attempting to develop these characteristics and make them sustainable.
- Sustainable transport policies are limiting the development of rural housing while they encourage extending the development of holiday accommodation. The travel footprint of weekly visitors to and around rural areas is not measured against the travel footprint of weekly activities of local residents.

CONSIDERATIONS:

1. To place rural communities at the heart of the Strategic Policy.
2. To provide “...enough flexibility to enable development, based on local need, in our most rural communities”.
3. To define “enhancement” in material terms as regards sustaining and developing the language, culture and heritage of our rural areas.

LDP: Rural Enterprise Dwellings

11.379 As noted through national policy, a rural enterprise dwelling is required where it 'is to enable rural enterprise workers to live at or close to their place of work'. This includes encouraging younger people to manage farm businesses and supporting the diversification of established farms.

11.380 It is not the role or the intention of the Revised LDP to replicate the provisions of national planning policy. Consequently, reference should be had to the provisions of PPW and Technical Advice Note 6 (TAN6) in the determination of applications for new rural enterprise dwellings. National policy clearly states that such proposals should be carefully examined to ensure that there is a genuine need.

11.381 Applications for rural enterprise dwellings should be accompanied by a rural enterprise dwelling appraisal, with permission only granted where it provides conclusive evidence of the need for the dwelling.

TAN 6: 4.1.1 The Assembly Government’s vision for housing is for everyone in Wales to have the opportunity to live in good quality, affordable housing, to be able to choose where they live and decide whether buying or renting is best for them and their families. This vision is applicable to both urban and rural areas.

Observations:

- The bar for proving “conclusive evidence of the need for the dwelling” is uniquely high for Rural Enterprise Dwellings in comparison with other housing categories. The amount of necessary evidence and the years required to compile data makes such applications prohibitive.
- TAN6: 4.1.1 contradicts the lengthy and detailed restrictions placed on individuals and families attempting to remain in their local community.
- The need to live near a rural enterprise should not be assessed on the employment needs of the enterprise alone. Families support rural enterprises in many other ways, not only through their employment on the site.
- Families in alternative fields of employment who have strong ties to the site should be encouraged to remain within their traditional and cultural setting.

CONSIDERATIONS:

1. To bring the requirements of Rural Enterprise Dwellings in line with the requirements of all other housing requirements – including urban housing and One Planet Development housing.
2. To apply the same test of need for a rural enterprise dwelling as that for a dwelling on a One Planet site.
3. To recognise the potential contribution of Rural Enterprise Dwellings to the sustainability of language, culture and heritage.
4. To acknowledge that creating an additional dwelling on a rural enterprise site supports the business and family whether or not the residents are in the employment of the enterprise.

LDP: RD2 - Conversion and Re-Use of Rural Buildings for Residential Use

Proposals for the conversion and re-use of suitable rural buildings for residential use will be permitted where:

- *the existing use has ceased, and its re-use would not result in the need for an additional building;*
- *the design and materials are of a high quality, and the form and bulk of the proposal, including any extensions, curtilage and access arrangements are sympathetic to and respect: the surrounding landscape, rural character of the area and the appearance of the original building;*
- *Proposals for extensions should be proportionate and reflective of the scale, character and appearance of the original building;*
- *the original building is structurally sound and any rebuilding works, necessitated by poor structural conditions and/ or the need for new openings in walls, do not involve substantial reconstruction;*
- *where applicable, the architectural quality, character and appearance of the building is safeguarded and its setting not unacceptably harmed.*

TAN 6: 3.6.1 *Whilst residential conversions have a minimal impact on the rural economy, conversions for holiday use can contribute more and may reduce pressure to use other houses in the area for holiday use.*

Observations:

- While RD2 permits the conversion of suitable rural buildings for residential use, the majority of these buildings lie outside the development limits of rural villages and therefore cannot be permitted as residential dwellings.
- This excludes a number of surplus farm buildings from being converted to homes for young local families, although they can be converted for holiday use.

- It is asserted that residential conversions for holiday use can contribute more to the local economy. Is there evidence that holiday accommodation contributes more to the local economy than residential families? This statement does not consider factors such as holiday accommodation being owned by individuals well outside the “local economy” and where the income goes directly out of the local area, county or country.
- It does not consider the contribution a residential family makes to the local economy on a daily, weekly and annual basis. A data-based study would provide evidence of this assertion.

CONSIDERATIONS:

1. To apply the same impact measurements of conversion to holiday cottages/barns on the open countryside as to conversion to residential cottages/barns in the open countryside.
2. To provide evidence of the carbon footprint benefit of tourist against that of residents.
3. To permit re-use/conversion of surplus rural buildings for residential use side by side with holiday use.

LDP: HOM7 - Renovation of Derelict or Abandoned Dwellings:

Proposals for the renovation of derelict or abandoned dwellings outside the Development Limits of a defined settlement (Policy SP3) will be permitted where:

- *It can be demonstrated that a significant part of the original structure is physically sound and substantially intact requiring only a limited amount of structural remedial works;*
- *The building demonstrates and retains sufficient quality of architectural features and traditional materials with no significant loss of the character and integrity of the original structure;*
- *There are no adverse effects on the setting or integrity of the historic environment.*

11.104 *The renovation of abandoned dwellings can make a small but important contribution to the needs of an area. The architectural value of a number of derelict or abandoned dwellings often reflects the traditional vernacular and should be recognised in the submission of such proposals. Extensions, access requirements or other aspects associated with the proposal should be sympathetic to the character of the original building and the landscape. Proposals which seek to make a positive contribution to the landscape qualities of the area will be encouraged.*

Observations:

- There is very little policy detail or guidance on the re-use of derelict dwellings or ruins to provide homes for local families. The guidance for derelict dwellings is arbitrary and open to interpretation.
- Sir Gâr no longer has a “traditional vernacular” style of dwelling. Most modern houses have for decades been built with breeze blocks. It is reasonable that farm buildings constructed from such materials, possibly with re-facing, should be considered for adaptation as dwellings.
- As part of the Levelling Up strategy, the UK Government has consulted on the “Right to Regenerate” bill which promises to re-use derelict buildings in public ownership, but not in private ownership.
- Farming unions are encouraging rural owners not to allow their property to fall into the “Abandonment” category which will require full planning permission for re-instatement as a residential dwelling.

CONSIDERATIONS:

1. To acknowledge the historic use of a derelict/abandoned dwelling in the open countryside in order to return it to its traditional residential use.
2. In 2023, to recognise the reality of the nature of the construction of many 20th Century rural buildings and consider their sensitive re-use as dwellings.
3. To encourage proposals which seek to make a positive contribution to the landscape qualities of the area.

RE-USE OF PLACES OF WORSHIP

11.450 *Many elements of the County's built and historic environment are protected through legislation or other policy provisions, and as such do not require policies in the revised LDP. The Plan does not therefore include policies in relation to facets of the built heritage such as Scheduled Monuments as they are adequately protected elsewhere.*

TAN24: Historic Assets of Special Local Interest - 8.1 - *Historic assets that the local planning authority may consider to be of special local interest are not accompanied by any additional consent requirements over and above those required for planning permission. However, if such assets are to contribute successfully to the conservation or enhancement of local character their status needs to be clear in the development management process. If a local planning authority chooses to identify historic assets of special local interest, it must include policies for their preservation and enhancement in the local development plan.*

Managing Change to Listed Places of Worship in Wales – Welsh Government: 5.13 *Closed or Closing Places of Worship: Listed places of worship may have a continuing and valuable contribution to make to the community even when they are no longer required for worship. Before they cease to be used for worship, it is important that there is no unnecessary delay in finding alternative uses compatible with the significance of the fabric, interior, contents and setting of the building.*

CADW - Historic Assets Of Special Local Interest: *Local planning authorities may choose to identify historic assets of special local interest - known as 'local listing' ... Local listing is important because it provides the base for local planning authorities to develop policies for their protection and enhancement. This means that local planning authorities can manage change through the planning system so that local historic assets continue to contribute to the vitality of the area ... Local listing also provides an opportunity for a community to get involved in the identification of historic assets of special local interest and in caring for them appropriately.*

Observations:

- **There is very little guidance on the functional re-use of chapels and churches in rural communities apart from their historic surroundings and facades.**
- **Many church and chapel buildings in rural areas are converted for holiday/second home use. This is not consistent with the interests of "local listing" to preserve the contextual integrity of the community asset.**

CONSIDERATIONS:

- 1. To acknowledge that the LDP could include measures to assess, secure and re-use closed Places of Worship for the benefit of the community.**
- 2. To encourage conversations between representatives of closing Places of Worship, planners and the community before disposal of the asset.**
- 3. To consider placing covenants on Chapels and Churches being converted to dwellings to ensure they are permanent residential dwellings rather than second homes in order to protect the historic integrity of the building for the future.**
- 4. To require that CADW exercises flexibility in its approach to the re-use of local historic assets so that they remain of value and interest to the community.**

LDP: RD3 - Farm Diversification

Proposals for farm diversification developments which strengthen the rural economy will be permitted where:

- *It is compatible with, complements and supports the principal agricultural activities of the existing working farm;*
- *It is of a scale and nature appropriate to the existing farm operation;*

- It has appropriate regard to the highways and transport infrastructure;
- It would not have an adverse impact on the character, setting and appearance of the area and the surrounding landscape.

11.393 Diversification in rural areas can often add to the income streams and economic viability of farms, strengthen the rural economy, and add to wider employment opportunities.

11.394 Farm diversification proposals are intended to supplement and support the continuation of the existing farming activity. Proposals should be accompanied by evidence detailing a justification for the use and its relationship with the existing farming activity.

11.396 In considering proposals for farm diversification it is acknowledged that their rural context means that they cannot always be well served by public transport. Consequently, whilst its availability will be taken into account when considering the nature and scale of the proposal, the potential for certain diversification proposals which can only be accessible by private car is acknowledged. Such proposals should have regard to the sustainable transport hierarchy.

Observations:

- While diversification in rural areas is encouraged, the capacity for young families to live and work on rural sites outside development limits is severely restricted, bordering on the impossible. This is detrimental to the sustainability of village communities.
- Many farm diversification plans are thwarted at the outset due to their rural siting, thus falling under the myriad restrictions on development in the open countryside.
- The perceived negative aspects of potential development outweigh the likely positive impacts on community sustainability.

CONSIDERATIONS:

1. To provide for local families who wish to remain in or return to their community to live and work in their rural area.
2. To examine the potential community benefit as a material consideration.
3. To provide more flexibility in the sources of income which contribute to a rural enterprise to allow spouses, partners and their progeny to remain in or return to their family homesteads.

GENERAL - MOVING RURAL CARMARTHENSHIRE FORWARD – Report and Recommendations of the Carmarthenshire Rural Affairs Task Group – June 2019:

3.2.4: *“The Council is currently in the process of revising its Local Development Plan and the Task Group feels there is a need to redress the current balance to enable appropriate and suitable development within our rural towns and communities. This development needs to be taken forward based on local need rather than national targets and regulations. There should of course be a thorough consideration and understanding of the impact that any residential or business development may have on the nature and construct of rural communities, especially in terms of its possible positive or negative impact on the Welsh language, and the size of development should also be comparative to the existing community, but suitable development in our rural communities needs to be enabled in order to ensure the sustainability of our rural communities going forward.”*

Observations:

- The Task Group has analysed and attempted to address and evidence the critical issues referenced above. However, it is apparent that the Local Development Plan continues to be led by national targets and regulations rather than by genuine local need.

WALES RURAL OBSERVATORY - 2013:

The Experiences and Aspirations of Young People in Rural Wales (2013) Housing availability and affordability - *Young families' experiences of the local housing market in the study areas also indicated that the current planning system was considered too regulatory and rigid, and often hindered the development of simple solutions to rural housing needs.*

The Experiences and Aspirations of Young People in Rural Wales (2013): Access to the decision-making process - *There is growing awareness and interest among the public and policy-makers of the important and critical role that young people play in forming and sustaining sustainable communities. This is particularly crucial in terms of rural communities, where the ageing population trend is particularly marked and where there has been a steady decline in the proportion of the younger population. Despite this, young people are too often excluded from the decision-making process.*

Observations:

- **The conclusion of this study summarises the issues faced in our rural communities. Although this study was published in 2013 there is no evidence that these conclusions are considered in the development of planning policies.**

SUMMARY OF CONSIDERATIONS IN RESPECT OF THE SECOND REVISED LOCAL DEVELOPMENT PLAN

1. **The Plan looks at rural communities from the outside. There is no recognition of the living, breathing, day-to-day rural village. The Plan needs to reverse its perspective.**
2. **The needs of real people are secondary to ideas, policies, regulations and planning aspirations. The needs of rural families should be the primary consideration.**
3. **The projected image of the countryside takes priority over the people who live in it. The people who create, enhance, protect and conserve this image should be heard.**
4. **Prohibiting development in many rural communities is contrary to the planning presumption to permit reasonable development in other geographic or demographic areas. The planning presumption should be applied consistently across all areas.**
5. **The Plan does not consider the needs of local people who do not fit the Local Needs criteria. Young professionals – teachers, nurses - who are not first-time buyers do not qualify for Affordable Housing but can't afford open market houses in their rural villages. The Plan should apply the needs of the community as a material consideration and provide for all young families.**
6. **Ordinary circumstances in urban areas are considered exceptional in rural areas. The Plan should not mitigate against rural families and young people.**
7. **The social and economic benefits of small rural businesses are outweighed by the requirement to project a particular image of the countryside. Small rural businesses are part of the culture and inheritance of the countryside and should be encouraged within the Plan.**
8. **The Plan provides for projected damage to the Welsh language and culture in future developments. It does not provide for the development of the Welsh language and culture in its existing strongholds. The Plan is reactive to Welsh-language issues, not proactive. The rural policies within the Plan should emanate from the Welsh-language strongholds to achieve CYMRAEG 2050.**
9. **The Plan prioritises the visitor economy over local needs in rural communities. The tourist, throughout the year, may eat, sleep and breathe the open countryside, but the local resident may not. The Plan should provide for parity of opportunity between all rural enterprises.**
10. **Amended Planning Use Classes (2022) requires that planning permission is needed to change a residential dwelling to a holiday/second home. It will take many years for this amendment to impact on rural house prices and availability. The Plan should consider applying flexibility while these factors bring some equity to housing availability in rural areas.**
11. **Placemaking and Sustainable Places policies are imposed on rural villages. The policies should be formulated from the inside outwards, not the outside inwards.**

12. **Active Travel and other Carbon Net Zero requirements prohibit residential dwellings in rural areas. The Plan excuses the visitor industry from similar carbon footprints. The Plan should apply the same standards to residents and visitors alike and encourage both to work side by side to reach targets.**
13. **The requirements for Rural Enterprise Dwellings are practically impossible to meet. This does not conform with aspirations for sustainable rural communities. The requirements for ALL residential dwellings across rural areas should be applied equally.**
14. **Any initiative inside or outside village development boundaries which could benefit local residents is likely to be prohibited. Strengthening communities should be a material consideration when assessing local initiatives.**
15. **Villages without settlement boundaries will not be able to accommodate the needs of their own residents. The Plan must provide opportunities for such communities to flourish.**

Rural villages are not Still Photographs.

They create, motivate, initiate, provide and support like any other community.

It is imperative that the Future Wales National Plan 2040 and the Carmarthenshire Local Development Plan 2018 – 2033 acknowledge and respect the identity and function of our rural communities.

Compiled and submitted by Plaid Cymru County Councillors, Cyngor Sir Gâr – April 2023

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APPENDIX

Many elements of our planning system create complex dilemmas for Local Members and particularly for Planning Committee Members when performing our roles and respecting our responsibilities:

- The **role** of the Local Member is to make the ward community a better place to live and work – to improve quality of life and to develop and support plans which enhance and protect the community, the environment and our future generations.
- The **responsibility** of the Local Planning Member is to observe the legislation, regulations and guidance which are set down on our behalf to maintain Order within our communities, the Local Authority and beyond.

The conflict between Members' roles and Planning Members' responsibilities gives rise to situations where councillors are forced to compromise one in favour of the other. The Local Member is regularly faced with two options:

- To support officers' recommendations which are damaging to their own community in order to conform with legislation, or
- To reject officers' recommendations and act contrary to legislation in order to protect their residents' well-being.

It is not possible to reconcile this conflict under current planning policies.