

Senedd Cymru
Y Pwyllgor Newid Hinsawdd, Amgylchedd a
Materion Gwledig
Craffu ar Fframwaith Datblygu Cenedlaethol Cymru
CCERA(5) NDF(v2) 18
Ymateb gan Cyngor Sir Gâr

Welsh Parliament
Climate Change, Environment and Rural Affairs
Committee
National Development Framework for Wales
CCERA(5) NDF(v2) 18
Evidence from Carmarthenshire County Council



sirgar.llyw.cymru
carmarthenshire.gov.wales

I write further to the invitation by the Welsh Parliament's Climate Change, Environment and Rural Affairs Committee: to submit views on the National Development Framework (NDF).

Having considered the content of the Draft NDF Carmarthenshire County Council broadly welcomes its content and a number of the amendments proposed. However, we would wish to make the following observations/comments:

Spatial - Urban and Rural Development

The Draft NDF continues to focus development and growth on 3 main centres namely which, from a Carmarthenshire perspective, includes Swansea Bay and Llanelli. This would seek to focus growth away from rural communities with only Carmarthen specifically identified as an additional centre for regional growth.

The proposed changes do, however, respond to some of the concerns raised in relation to rural matters by including new policies for rural areas and enhanced recognition throughout the document of the positive vision for development in rural places. This is welcomed, as is the provisions for Local Development Plan's (LDP) and Strategic Development Plans (SDP) to respond to the needs of such communities. It is clear however that our rural communities are often inherently diverse in function and scale. In this respect, they do not necessarily reflect the description of sustainable rural settlements set out within the Draft NDF. The description as it stands excludes many of the smaller villages and communities which characterise rural Wales and whilst the level of opportunities for new homes etc may be relatively small they nevertheless provide important opportunities to sustain rural communities and economies. In this respect it is important that the NDF and National Planning Policy provides appropriate opportunities for rural local authorities to provide sustainable growth within such communities.

In this respect the reference to 'development in towns and villages in rural areas will support local aspirations and need, complementing rather than competing with efforts to grow our cities and towns' is welcomed. We also welcome the reference to LDP's in the South West playing a central role in shaping how rural communities sustain themselves.

We welcome the inclusion of Policy 4 – Supporting Rural Communities and Policy 5 – Supporting the Rural Economy.

Whilst we welcome the fact that Llanelli is identified as a key development area, however we reiterate our previous comments namely:

The Draft NDF should incorporate the wider strategic areas such as Cross Hands Strategic Employment Zone, identified as a Regionally important growth zone in terms of providing jobs for the area and the wider economy; in order to achieve that objective transport investment and prioritised connectivity is needed.

In this regard, Cross Hands is a key growth area for the County (supported by significant WG infrastructure funding) and contributes to growth within the wider region. On the basis of the Draft NDF, Carmarthen would have a regional (albeit reduced) role below that of Llanelli, whilst Cross Hands, Ammanford etc. would have no significance. Whilst it is appreciated that local developments plans and Strategic Development Plans will respond to regional and local issues, the lack of national plan level recognition of such settlements would raise significant concerns in terms of future WG funding priorities (which will be aligned to the NDF). Therefore, other key towns and growth areas in our county – Cross Hands, Ammanford etc (and even Carmarthen) may not be able to attract the required funding and infrastructure support thus diminishing their regeneration opportunities and roles within the County and region.

There has been a lack of reference to the current spatial and growth policies within the region. In this respect it is noted that Ammanford/Cross Hands is omitted (presumably on the basis of individual settlement population levels) despite its longstanding status as a 'growth area' within numerous development plans and as an area for investment and growth both within economic/regeneration strategies and also through the City Deal.

We remain unclear methodology for the identification of settlements across the respective regions. There would seem to be limited recognition of the key roles which many large settlements play within their regions beyond generic statements. This is notably applicable to market towns, or those settlements where there may be a combined population arising from an interconnected spatial form. In relation to the proposed policies and approach for the Mid and South West Region and its significant rural components, this approach fails to recognise the key and often strategic role settlements within such areas have within their rural communities. It is however noted that we welcome the further emphasis on rural matters.

Welsh Language

We support the positive and ambitious aims outlined in in respect of the Welsh language, and in particular welcome the recognition given to the importance of providing jobs and homes to support the language in Welsh speaking communities. The focus on the prevalence of the Welsh language in relation to South West Region is welcomed.

However, the establishment of CJC's need to be mindful of the linguistic sensitives and characteristics of all their component authorities. In this regard the prevalence and importance of the Welsh language within the Carmarthenshire context must be fully reflected and recognised through the CJC's and across the region.

It is presumably considered a matter for LDPs to consider how the land use planning system can support the Welsh language. It will therefore be entirely down to the content of respective LDPs to deliver on the Draft NDF's outcome. However, given that the growth of the Welsh language is one of the outcomes of the Draft NDF and that its importance has

been acknowledged in respect of all regions, we consider that it should be categorised as a strategic matter of national importance and further elaboration and guidance through a policy should be provided.

Green Belt

We note the inclusion of Policy 30 in relation to supporting the use of Strategic Development Plans to identify and establish green belts to manage urban form and growth in the South West, particularly around Swansea Bay and Llanelli.