Statement of Case

Laugharne Recreational Ground, Laugharne, Carmarthenshire, SA33 4TE

Appeal by Sancler 3 Ltd

June 2025

Document Reference: 240090/SoC





Contents

1.	Introduction	3
Pref	ace	3
Scop	oe & Structure of this Statement	5
2.	The Proposed Development	6
The	Site	6
The	Application	6
The	Rationale for the Application	6
The	Proposals	7
3.	History of the Application Proposals	8
Pref	ace	8
Pre-	Application Dialogue with the Council	8
The	Consideration of the Appeal Proposals by the Council	8
4.	Planning Policy Context	15
Pref	ace	15
Plan	ning Constraints	15
Nati	onal Planning Policy and Guidance	16
Loca	al Planning Policy	18
5.	Putative Reasons for Refusal	20
Pref	ace	20
PRR	01: Tree removal is not compliant with the step-wise approach	20
PRR	02: Tree removal not off-set by public benefits	22
PRR	03: Net benefit for biodiversity	25
PRR	04: Extension of the sports pitches	26
6.	Summary & Conclusions	30

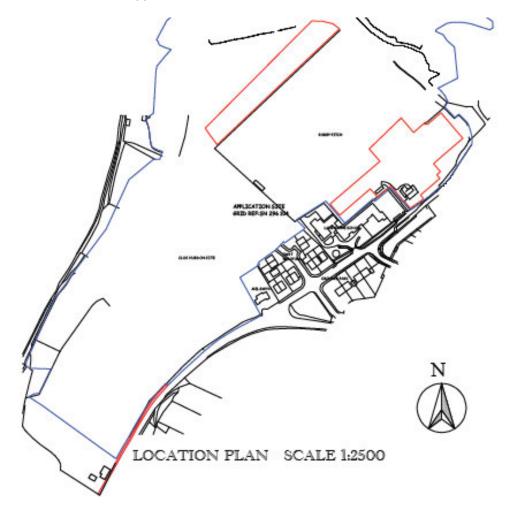
Appendices

- Appendix 1: Site Location Plan
- Appendix 2: Application Decision Notice (LPA Reference PL/0760) (dated 11/02/2025)
- Appendix 3: Minutes of Meeting with Council Officers (21 February 2024)
- Appendix 4: Primary School Places Data (2022)
- Appendix 5: The Carmarthenshire Pitch Sports Facilities and Clubs Vision Plan (April 2024)
- Appendix 6: The Council's Public Open Space Assessment Technical Report (January 2024)

1. Introduction

Preface

- 1.1. This appeal statement has been prepared by Amity Planning in relation to a planning appeal lodged on behalf of Sancler 3 Ltd (hereafter known as 'the Appellant') under Section 78 of the Town and Country Planning Act 1990 [as amended] against the decision of Carmarthenshire County Council (hereafter referred to as 'the Council') to refuse to grant planning permission for an extension to Laugharne playing field, the demolition of the existing playing field changing rooms, erection of a sports pavilion/clubhouse, an extension to Laugharne Primary School and the provision of an all-weather pitch and shared car park.
- 1.2. The proposals were submitted to the Council in the form of a hybrid planning application. The detailed element of the application for which the Appellant seeks full planning permission is the engineering operations to extend the playing field. Outline planning permission (with all matters reserved for subsequent approval) is sought for the remainder of the proposals.
- 1.3. The extent and location of the site is shown on the site location plan below. A copy of this redline site location plan is also included at Appendix 1.



- 1.4. The planning application (LPA Reference PL/07630) was refused by the Council under delegated authority for the following reasons:
 - 1. Planning Policy Wales Edition 12 states that where individual or groups of trees and hedgerows are removed as part of a proposed scheme, Local Planning Authorities must first follow the step-wise approach. In this case the Local Planning Authority is not satisfied that the removal of two Category A and four Category B trees is unavoidable and that all reasonable alternative siting and design options for the scheme that would result in less harm have been fully considered. Claims that the removal of these high and moderate value trees is required in order to to improve the usability of the playing field have not been justified. The proposal is therefore contrary to Policies SP1, GP1, EQ4 and SP14 of the Carmarthenshire Local Development Plan in that it does not protect and enhance the areas biodiversity and retain important local features.
 - 2. Planning Policy Wales Edition 12 states that the permanent removal of trees, woodland and hedgerows will only be permitted where it would achieve significant and clearly defined public benefits. The Local Planning Authority considers that the proposed public benefits, namely the extension to the school, car parking and all weather pitch, are not demonstrably achievable within the lifetime of any planning permission, given that the applicants intention is to provide the land to the County Council who have no tangible plans or the necessary funding to carry out any of these developments, the school currently operating at 45% of its current pupil capacity. Similarly, the proposed changing rooms are not being delivered by the applicant who proposes to transfer the land to the Laugharne Corporation who would be responsible for seeking funding for the development. These potential public benefits are considered to be theoretical benefits rather than tangible, achievable benefits and are therefore afforded little weight as they do not constitute significant and clearly defined public benefits. The provision of approximately 110m of footway linking Laugharne and Broadway is a potential public benefit but in itself is not sufficiently significant to outweigh the unacceptable loss of high and moderate value trees. The proposal is contrary to Policies SP1, GP1, EQ4 and SP14 of the Carmarthenshire Local Development Plan in that it does not protect and enhance the areas biodiversity and retain important local features.
 - 3. Section 6 of the Environment (Wales) Act 2016 places a duty on public authorities to 'seek to maintain and enhance biodiversity' so far as it is consistent with the proper exercise of those functions. In so doing, public authorities must also seek to 'promote the resilience of ecosystems'. Future Wales, The National Plan 2040 (Policy 9) requires the Local Planning Authority to seek to enhance biodiversity through the planning process, The proposed development does not demonstrate how a net benefit for biodiversity will be secured. The development would result in the loss of two Category A and four category B trees and a loss of 55.7% canopy cover to be replaced by eight 1.5m high feathered whips within the translocated hedgerow, which equates to a significant net loss of biodiversity. The proposal is therefore contrary to Policies SP1, GP1, EQ4 and SP14 of the Carmarthenshire Local Development Plan as well as Policy 9 of Future Wales: The National Plan and the Section 6 duty.
 - 4. The applicant has not demonstrated that extension of the sports pitches is necessary to improve their usability or why the existing pitches are substandard. The land raising operations therefore amount to unsustainable form of development in the open countryside contrary to Policy SP1 of the Carmarthenshire Local Development Plan and contrary to the principles of the sustainable management of natural resources as defined in the Environment (Wales) Act 2016.
- 1.5. A copy of the decision notice (LPA Reference PL/07630), dated 11 February 2025, is attached at Appendix 2.

Scope & Structure of this Statement

- 1.6. This statement documents the Appellant's case in relation to the appeal and is structured as follows:
 - Section 2 describes the proposed development and its consideration by the Council;
 - Section 3 provides a detailed explanation of the proposed development and the consideration of the application by the Council;
 - Section 4 examines the planning policy context applicable to the proposals;
 - Section 5 assess the putative reasons for refusal which are relied upon by the Council and responds to these, appraises the planning merits and other material considerations of the scheme, and
 - Section 6 presents a summary and makes conclusions on the merits of the proposals.

2. The Proposed Development

The Site

- 2.1. The site comprises three parcels of land edged in red on the site location plan included at Appendix 1.
 - A linear strip of land to the northwest of and adjoining Laugharne recreational ground. This strip of land runs the full length of the existing playing field and forms part of a vacant irregular shaped field. The southeastern boundary of the field is marked by a hedgebank that divides it from the recreational ground.
 - 2. An irregular shaped parcel of land to the north and northeast of Laugharne Primary School. This land comprises part of the existing recreational ground and partially adjoins the school's boundary, extending to the northeast to include a series of storage containers, the existing recreational ground changing rooms and its access onto Stoneway Road.
 - 3. A linear strip of land adjacent to the northern side of the A4066 carriageway, extending from where the existing footway in Broadway terminates, along the frontage of the property known as Wooford House continuing north to meet the footway in front of the residential development known as Clos Hugdon.

The Application

- 2.2. This appeal is made in respect of a hybrid planning application (LPA Reference PL/07630) that was submitted to the Council for an extension to Laugharne recreational ground playing field, the demolition of existing changing rooms, erection of a sports pavilion/clubhouse, extension to Laugharne Primary School and provision of an all-weather pitch and shared car park.
- 2.3. The detailed element of the application, for which the Appellant seeks full planning permission, is the engineering operations to extend the recreational ground playing field. Outline planning permission (with all matters reserved for subsequent approval) is sought for the remainder of the proposals.

The Rationale for the Application

- 2.4. The Appellant acquired ownership of Laugharne Recreational Ground and the adjacent woodland to unlock the potential for the delivery of a significant package of community benefits comprising the extension of Laugharne playing field to improve its useability, a much-needed extension to Laugharne Primary School, together with the erection of a new sports pavilion/clubhouse, the provision of an all-weather pitch and 82 no. space car park for the shared use of the school and playing field users.
- 2.5. To realise this opportunity and allow the delivery of these community benefits, by enabling the required land to be transferred to Carmarthenshire County Council and a community body in Laugharne, there is a need to off-set their associated cost. To achieve this, the hybrid planning application was submitted alongside and in conjunction with two applications under The Town and Country Planning (Modification and Discharge of Planning Obligations) Regulations 1992 (Section 106A applications) for the modification of planning obligations secured under the following planning permissions to allow the affordable dwellings on each adjacent housing site to be sold or rented on the open market.

- Planning permission APP/M6825/A/18/3208210 (LPA Reference W/35450) for the development of 42 no. residential dwellings on land adjacent to Laugharne Primary School, known as Clos Hugdon; and
- 2. Planning permission W/27727 for the development of 24 no. residential dwellings on land south of Gosport Street (A4066), known as Pludds Meadow.
- 2.6. Despite the Section 106A applications (LPA References PL/07643 & PL/07644) being submitted to the Council at the same time as the hybrid planning application, the three applications can be considered independently, and the appeal proposals should not stand or fall based on the outcome of Section 106A applications. The Section 106A applications remain under consideration by the Council.

The Proposals

- 2.7. The appeal proposals relate to the extension of Laugharne recreational ground playing field by approximately 22m in length and 154m in width to improve its useability (land parcel 1). To achieve this, the land to the rear (north) of the playing field has been raised and the existing hedgerow that marks the edge of the field will need to be translocated further back.
- 2.8. The outline element of the proposals (land parcel 2) relates to the provision of a much-needed extension to the rear of Laugharne Primary School (measuring 530 sqm), together with the demolition of the existing changing rooms, erection of a new sports pavilion/clubhouse (measuring 465 sqm), the provision of an all-weather pitch and 82 no. space car park to be accessed via the recreational ground's existing point of access for the shared use of the school and playing field users.
- 2.9. The primary school and recreational ground have existing points of access onto Stoneway Road. The primary school access falls outside the appeal site and will remain unaltered. This leads to a small forecourt to the front and side of the school building that offers limited parking or manoeuvring space for staff or deliveries. Pupil drop-offs take place on the street or by using a small parking area on the opposite side of Stoneway Road, the access to which is constrained. The recreational ground access leads directly onto the playing field and does not benefit from a formal parking or turning area. The proposals will reuse this point of access, albeit the land will be made available by the Appellant to widen the access mouth to accommodate two-way vehicle movements and improve visibility.
- 2.10. The proposals also include highway improvement works, comprising the formation of a footpath linking Broadway to Laugharne along the A4066 (land parcel 3). This work includes the erection of driver feedback signs to enforce the speed limit. The works to provide this footway have been commenced and are partially complete. This is much needed in order to provide a safe means of passage for pedestrians, particularly for children who live in Broadway to attend Laugharne Primary School.

3. History of the Application Proposals

Preface

3.1. This section of the statement summaries the pre-application dialogue with the Council that led to the submission of the application.

Pre-Application Dialogue with the Council

- 3.2. A pre-application meeting was held at the Council's offices on 21 February 2024. The following people were in attendance.
 - Rhodri Griffiths CCC Head of Place & Sustainability
 - Simon Davies CCC Head of Access to Education
 - Hugh Towns CCC Head of Planning
 - Hywel Humphries CCC Senior Valuer
 - Sara Griffiths CCC Modernisation Team Manager
 - Stephen Kirkwood Sancler 3 Ltd
 - Carl Thornton Sancler 3 Ltd
 - Mike Southall (Avison Young later joined Amity Planning)
- 3.3. The Council issued meeting minutes, a copy of which is included at Appendix 3.
- 3.4. The purpose of the meeting was to inform Council Officers that the Appellant had secured ownership of Laugharne recreational ground, enabling the delivery of long awaited and much needed community benefit in the form of educational initiatives, recreational facilities and highway improvement works.
- 3.5. The key points discussed during the meeting were:
 - From an educational perspective, Laugharne has been identified by the Council as a priority for investment and consultation was planned with the Council's Cabinet on the strategy for the entire Modernising Education Programme (MEP) of investment moving forward.
 - Land access issues have prevented the extension of Laugharne Primary School. However, this may now be deliverable.
 - The adjacent housing developments, known as Clos Hugdon and Pludds Meadow, have experienced viability issues due to rising costs. Accordingly, it is in the Appellant's gift (as landowner) to submit applications to modify the respective Section 106 legal agreements.
 - The Council acknowledged the nearby housing development sites will increase demand for school places.

The Consideration of the Appeal Proposals by the Council

3.6. The procedural consideration of the planning application sets important context to the appeal scheme in that it defines the key areas of dispute that arose during the application process, along with the aspects of the proposals to which no objection was raised by the Council, stakeholders and consultees. The following sections of this statement describe the dialogue and negotiations that took place between the Appellant,

their consultancy team, and Officers of the Council, before concluding with the Council's determination of the application.

The Validation of the Application

3.7. A hybrid planning application was submitted to the Council on 23 April 2024 and was made valid by the Council on 25 April 2024 (LPA Reference PL/07630).

The Consideration of the Application

3.8. Between May 2024 – February 2025, the following consultation responses to the application were received by the Case Officer (copies of the available responses are included as part of this appeal – Documents 22-32).

Statutory Consultations:

- CCC Education No objection. No contribution is sort towards education since there are no dwellings proposed.
- CCC Flood Defence and Coastal Protection Officer There is no objection on flooding grounds. In terms of sustainable drainage, the sustainable drainage statement provided is sufficient for the planning process. As the development construction area proposed will be greater than 100sqm the developer will need to apply for SAB approval.
- Heneb (Formerly Dyfed Archaeology) No objection and no further action required. The supporting documentation includes an Archaeological Appraisal prepared by Archaeology Wales (report No. 2199, June 2023) This concludes that the proposed development is unlikely to encounter archaeological remains.
- CCC Valuation No comments since no housing is proposed.
- Dwr Cymru Welsh Water No objection to the foul water drainage arrangements. In terms of surface water drainage, DCWW request a condition restricting surface water discharging to the public sewerage system.
- CCC Arboriculture Officer Requests a Tree Report that complies with/includes the following:
 - 1. Comply with BS Standard 5837:2012 Trees in relation to design, demolition, and construction recommendations.
 - 2. Be completed by qualified arborists and includes the name of the surveyor and their qualification and ideally reference to relevant experience.
 - 3. An assessment of the condition and category of the trees on the site and boundary trees.
 - 4. A plan showing the Root Protection Areas (RPAs) including boundary trees.
 - 5. A plan of the RPAs in conjunction with all the development proposed, including access to and within the site, overhead and underground utilities, SUDs and any works proposed to take place within the RPAs.
- Natural Resources Wales No objection.
- CCC Built Heritage Officer No objection.
- CCC Environmental Health (Public Health Services) No objection.

- CCC Environmental Health (Pollution and Wellbeing)
 - Air quality No adverse comment.
 - Noise Raises queries about the potential operation of the proposed clubhouse and allweather pitch.
 - Contaminated Land Raises concerns that within 250 meters of the site boundary, there is an area of unknown filled ground and a historic woollen factory. Although there is no immediate evidence suggesting these areas have negatively impacted the site within the defined project boundaries (red-line boundaries), concerns remain regarding the broader designated area (blue-line boundary), particularly as some portions of the site are intended to be offered to the community for recreation. These areas, adjacent to the features, may require further consideration to ensure they do not pose risks to the proposed recreational spaces.
- CCC Ecology Officer Object.
 - Trees The proposals involve the removal of T1, T7, T8, T9, T10 & T11. These are category A and B trees and should be retained and an alternative design sought, as mature trees are an irreplaceable natural resource. The site contributes locally to ecosystem resilience and habitat connectivity. Where the adverse effect on biodiversity and ecosystem resilience clearly outweighs other material considerations, the development should be refused.
 - Net Benefit for Biodiversity (NBB) The site contains mature trees and it has not been shown that the step-wise approach has been followed not net benefit for biodiversity achieved. The Arboricultural Report (27 August 2024) states there will be a 55.7% loss of canopy cover and that mitigation can be provided in the proposed recreation area. The Green Infrastructure Statement (April 2024) proposed 8 hedgerow trees to be established within the new hedge bank as feather whips. NBB has not been evidenced given the mature trees are an irreplaceable natural resource.

Representations:

A total of 206 representations were received by the Council. 205 were in support and only 1 raised objection. The letters/emails are published on the Council website, but a summary of the main comments is set out below.

- Representee supporting comments:
 - Youth and adult sport are a vital part of the Laugharne community and has been for generations. It is imperative that growth and development is invested into these areas to pave a successful future for Laugharne sport.
 - Enhanced Sports Facilities: The extension of the playing fields and the addition of an allweather pitch will provide greatly improved facilities for sports and recreation. This will support both school and community sports programs, encouraging physical activity and healthy lifestyles for residents of all ages.
 - Modernised Infrastructure: The new sports pavilion/clubhouse will replace outdated facilities, offering modern and accessible amenities. This will enhance the user experience for athletes, students, and spectators, fostering a vibrant community hub.
 - Educational Benefits: The extension to Laugharne Primary School will provide muchneeded additional space and resources to accommodate growing student numbers. This will help to ensure that local children have access to a high-quality learning environment.
 - Community Cohesion: The shared car park and upgraded facilities will create a central
 point for community activities, bringing together residents from different backgrounds and
 fostering a sense of unity and pride in the local area.

- Sustainable Development: The proposed development includes provisions for sustainable building practices and efficient use of space, demonstrating a commitment to environmentally responsible growth.
- There is a need for improved and more parking in the area.
- The changing rooms have not been updated since the 1940's because it does not belong to the community. However, the proposals will provide this opportunity.
- There is a need for a proper and secure playing field.

Representee objections:

- Concerned about users of the recreational ground parking behind and in Orchard Park causing damage to residential fences and creating noise, disturbance and congestion.
- Laugharne Township Community Council
 - The proposals will bring a number of health and wellbeing benefits to our community as well as improving community safety through the provision of a footpath to Broadway.
 - The lack of footpath along the A4066 has been a source of great concern to our community many times over the last few years and has been raised with CCC Highways previously.
 - The school needs modernisation and welcomes the extension, as do our local families whose children attend.
 - The new sporting facilities at Wooford Playing Fields will provide considerable health benefits to our residents and many local sports clubs, including Laugharne Athletic Club.
 - The inclusion of a car park at that site will also ease local parking pressures and increase child safety at school drop off and pick up times.

<u>Dialogue Between the Appellant and the Council During Consideration of the Application</u>

- 3.9. During the consideration of the application the Appellant's agent entered into email dialogue with the Council to obtain updates on the application's progress but also to address matters arising.
- 3.10. It became swiftly apparent that the local community are in full support of the proposals. This is demonstrated by the 205 representations of support received by the Council. In contrast, only 1 objection was received.
- 3.11. On 24 June 2024, the Council's Environmental Health Pollution Team issued their consultation response (Document 31) querying the future operations of the pavilion/clubhouse and all-weather pitch in respect of the potential for noise. The Appellant responded by email on 26 June 2024 clarifying that both of these aspects of the proposals are indicative and have been applied for in outline form only. The intention is to gift this land to the community for them to submit the reserved matters and, thereafter, build and operate the use. As such, at this time, the Appellant cannot be sure of how the use will operate or what the hours of operation would be. It seems reasonable that such matters can be controlled by condition to overcome any concerns. It was further clarified that the points raised about alcohol being served and noise generation are controlled under separate legislation, so should not need to be duplicated as part of any planning permission that may be granted. The potential for disturbance of land contamination was also raised on the basis there was a woollen factory in the area. The Appellant clarified the factory was not on this land and was, in fact, some distance away, having been demolished over 100 years ago. There is, therefore, no known land contamination present. In terms of the potential for asbestos, the Control of Asbestos Regulations 2012 makes it the responsibility of the landowner to manage any asbestos in accordance with the regulations, whether this relates to repair/maintenance of a building or disposal of the material.

- 3.12. The Council's Arboriculture Officer issued a consultation response on 03 June 2024 (Document 26) requesting a Tree Survey of those trees at the front of the site adjacent to the proposed shared car park. The Appellant duly commissioned a report, prepared by Tree Consultants Wales, surveying the trees at the front of the site adjacent to the proposed car park serving the recreation ground. This report (submitted to the Council on 31 July 2024) includes an impact assessment, method statement and tree protection plan. The report surveyed three individual trees (T1, T2 & T4) and one tree group (G3). Of these trees, T1 (a Sycamore Category B) is proposed to be removed to facilitate the proposals, T2 (an Ash Category C) is proposed to be coppiced, and G3 (a mix of Sycamore, Ash and Common Oak Category B) would be subject to crown raising work. In view of the findings of the Tree Survey, the Appellant amended the indicative site layout plan (reference 126/10B Document 18) to pull the car park hardstand away from the tree line. To comply with the requirements of PPW 12 and compensate for the loss of T1, the Appellant proposed to plant a minimum of three new trees.
- 3.13. The Council's Arboriculture Officer responded on 31 July 2024 stating the Tree Survey should also cover the trees that are to be removed adjacent to the development, positioned at the north of the site within the area labelled 'Extension to playing field'.
- 3.14. The Appellant duly commissioned an extended survey of the trees to include those in the northern portion of the site (i.e. the area proposed for the extension to the recreation ground). This extended survey (Document 17) includes an impact assessment, method statement and protection plan. The survey demonstrates a total of 6 no. trees are proposed to be removed to facilitate the works. Five of these trees (T7-11) are located within the hedgebank in the area proposed for the extension to the playing field. The sixth tree to be removed (T1) is in the area of the improved access (as referenced in the paragraph above). The removal of the trees will be mitigated by replanting at a ratio of 1:3 trees and for the tree at the site's point of access (T2) coppicing is proposed.
- 3.15. The Council's Arboriculture Officer responded on 29 August 2024 stating the trees marked T7 to 11 are a major constraint on the site and T9 and T10 are category A trees that should be retained. As such, it was suggested that a more sympathetic design would be favourable.
- 3.16. On 02 September 2024, the Appellant responded directly to the Council's Arboriculture Officer advising that it would not be possible to retain T9 (Category A ash) and T10 (Category A sycamore) since these trees sit centrally within the hedgebank and on the land required to form one of the ruby pitches, but also within the area of the cricket pitch. Since they impede the extension of the playing field, it is not possible to retain them and, instead, replacement planting is proposed. Further justification was provided for their loss this is largely detailed in the Hedgerow Translocation & Creation Plan (Document 13) that supports the application and proposes to translocate 150m of hedgerow 25m further back into the site. This report advises the loss of T9 and T10 was suitably mitigated.
- 3.17. The Council's Arboriculture Officer responded on 11 September 2024 stating that whips planted in a hedge row are not sufficient mitigation for the losses proposed and the ecology factor of these mature trees is high. A proportionate value of the trees was requested to agree suitable mitigation.
- 3.18. The Appellant responded on 12 September 2024 advising the development proposals provide significant public benefit to the residents of Laugharne, which is a material consideration. Nevertheless, the Appellant offered to enhance the initially proposed mitigation (i.e. the 8 no. proposed whips in the hedgerow (Oak, Sycamore and Rowan)). Instead, the Appellant committed to planting 8 no. semi-mature trees of 35 40cm girth with a height of 6.5 8 meters of native variety and a further 10 no. trees of the same type and size in suitable locations within the recreation ground to be agreed with the Authority. Therefore, a total of 18 no. new trees are proposed by way of compensation for the 6 no. trees to be removed.

- 3.19. The Council's Arboriculture Officer responded on 12 September 2024 requesting a monetary value for the trees to be removed using the CAVAT (Capital Asset Value for Amenity Trees) system.
- 3.20. The Council's Planning Officer met with the Council's Arboriculture Officer and Ecologist to discuss the proposals and extent of revised mitigation proposed to compensate for the removal of 6 no. trees. This meeting culminated in a response to the Appellant on 31 October 2024 raising a number of points and queries relating to ecology, trees, highway safety, land ownership/transfer, whether funding is available for the school extension and the extent to which the proposals represent public benefit. The Appellant responded by letter (Document 19, including its appendices 19a-19e) on 20 November 2024 setting out the Council's comments in a table format, together with their point-by-point responses.
- 3.21. Following submission of the Appellant's response letter (Document 19), the Planning Officer advised a reconsultation exercise was underway. Despite the Appellant requesting to know if this was a targeted reconsultation and when this period closed, no information was forthcoming from the Council. The Appellant also made numerous offers to meet with Council Officers to discuss the proposals, but these offers were not acknowledged or accepted (refer to Document 34 for relevant emails).
- 3.22. The Planning Officer responded on 29 January 2025 querying what alternative locations and designs have been considered for the proposed Club House/Sports Pavilion and why these alternatives have been discounted. The Council suggested the northeast of Rugby Pitch 1 would remove the need to move Pitch 1 to the northwest and would allow for the hedgerow and trees to be retained.
- 3.23. The Appellant responded on 31 January 2025 welcoming the Council's suggestion and willingness to find a solution to appease the Council's Tree Officer and Ecology Officer. However, to demonstrably improve the recreational ground's offer and for the proposals to be deliverable, the translocation of the hedgerow to enable the extension of the playing field is unavoidable. The Appellant further advised that various design scenarios (that included the location of the clubhouse and both pitches) had been considered in the lead up to the submission of the application, settling on the scheme proposed.
- 3.24. It was advised essential for the clubhouse to be centrally positioned and located adjacent to the carpark for ease of accessibility and use. The clubhouse will contain the changing rooms and showers, as well as function rooms and food outlet. Positing the building some 100m from the carpark and at the furthest point from one of the pitches would not be practical and would impact useability. Also, divorcing the clubhouse from the existing and other proposed built-form (i.e. school, car park, all-weather pitch) may raise concerns regarding its visual impact, since it would move it into the open and would result in the need for more infrastructure, in the form of pathways to cater for pedestrian movements without churning the grounds and potentially a road to enable servicing and provision of access for disabled users.
- 3.25. The Appellant referenced their letter of 20 November 2024 (Document 19), which acknowledges PPW's step-wise approach to biodiversity enhancement and seeks to minimise the works to translocate the hedgerow, also compensating for the loss of the five trees within the hedgebank and the additional tree that needs to be removed to improve the access by proposing to plant 18 no. semi-mature trees elsewhere within the recreational ground.
- 3.26. The Appellant emphasised that the application has been met with resounding positivity from the local community. The Appellant also highlighted that they have factored in the numerous and ever-growing number of competing interests required to be considered as part of the planning application process and, on this basis, the scheme is acceptable and represents a significant opportunity to provide important community benefit.

The Council's Resolution to Determine the Application

- 3.27. Despite the lengthy determination period, unfortunately, there was minimal opportunity for dialogue with the Council during the application process and the application was recommended for refusal by the Council's Planning Officers and determined under Officers' delegated authority. There are four putative reasons for refusal. These are detailed in full on the decision notice, which is attached at Appendix 2.
- 3.28. A request was made by the Appellant for Officers' delegated report. However, the Council confirmed by email on 05 June 2025 that it does not produce delegated reports and the reasons for the decision are set out in the decision notice.
- 3.29. The first three Putative Reasons for Refusal (PRR) (1, 2 & 3) are linked insofar as they object to the removal of 6 no. moderate and high value trees on the site, which the Council allege has not be justified or suitably mitigated and, as a result, Net Benefit for Biodiversity (NBB) has not been demonstrated. The final PRR (4) alleges the extension of the sports pitches is not necessary to improve their useability and the land raising required to achieve this represents an unsustainable form of development in the countryside.
 - **PRR 01** The proposed tree removal is not compliant with Planning Policy Wales' step-wise approach and it has not been demonstrated that all reasonable alternative siting and design options for the scheme, that would result in less harm, have been fully considered.
 - **PRR 02** The proposed tree removal is not off-set by the proposed public benefits of the scheme, which the Council allege are theoretical rather than tangible. It is further alleged that, given these public benefits are not achievable within the lifetime of the planning permission, only limited weight can be attributed to them.
 - PRR 03 The Council allege it has not been demonstrated how a NBB will be secured.
 - **PRR 04** The Council allege that it has not been demonstrated the extension of the sports pitches is necessary to improve their usability and the land raising operations amount to an unsustainable form of development in the open countryside.
- 3.30. The key issues for consideration by the appeal can be broken down into the following matters:
 - 1. Whether the removal of 2 no. Category A and 4 no. Category B trees is acceptable in the context of the proposals.
 - 2. Whether NBB has been demonstrated.
 - 3. Whether the land raising operations required to extend the sports pitches represents an unsustainable form of development in the countryside.

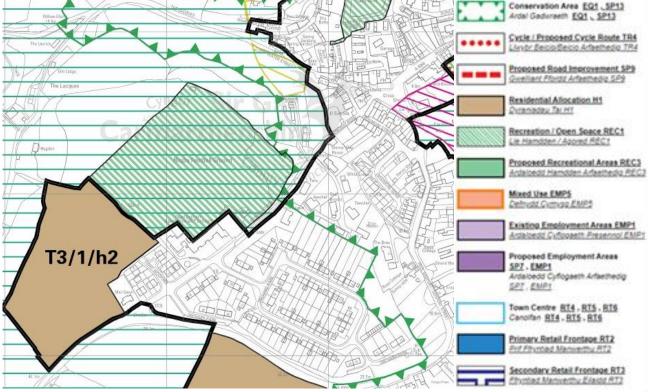
4. Planning Policy Context

Preface

- 4.1. This section of the statement identifies the key planning policy and guidance pertinent to the appeal proposals at both the national and local level.
- 4.2. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that an application for planning permission should be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 4.3. The planning policy that supports the proposal exists at a number of levels and extends to a range of guiding documents. To highlight the site's potential, the following sections record the main provisions of the principal statutory planning documents and strategies of relevance. It establishes the context within which the proposed development will need to be brought forward.
- 4.4. National guidance comprises Planning Policy Wales Edition 12 (PPW) (February 2024), as well as a range of supplementary Technical Advice Notes (TANs). At the local level, the Carmarthenshire Local Development Plan (LDP), which was adopted in December 2014, comprises land allocations as well as specific 'land use' policies against which all planning applications are considered. Relevant Supplementary Planning Guidance (SPG) seek to supplement the policies of the LDP and also form material considerations.

Planning Constraints

4.5. The appeal site falls outside the settlement boundary for Laugharne and land parcels 1 & 2 are identified as recreation / open space on the LDP Proposals Maps (extract below) that accompanies the adopted Carmarthenshire Local Development Plan.



Extract from Adopted Local Development Plan Proposals Map

- 4.6. There are no listed buildings or Scheduled Ancient Monuments (SAMs) on the site. The closest heritage asset in the surrounding area listed buildings located within the centre of Laugharne and Laugharne Castle (a SAM Cadw reference CM003).
- 4.7. The site is not subject to any statutory or local ecological designations. It is, however, located within the Taf and Tywi Estuary Outstanding Registered Historic Landscape (Cadw Reference HLW(D)9) and the Carmarthen Bay and Estuaries Special Landscape Area (SLA) designation.
- 4.8. The site is not at risk of flooding (it is within Zone 1 according to Natural Resources Wales' Flood Map for Planning) and is not within a designated Air Quality Management Area.
- 4.9. None of the trees on the appeal site are protected by a Tree Preservation Order, the site is not in a conservation area and the nearby woodland is not designated as ancient woodland.

National Planning Policy and Guidance

Future Wales – National Plan 2040

4.10. Future Wales – The National Plan 2040 (February 2021) sets the direction for development across Wales to 2040. It constitutes a national development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, and improving the health and well-being of communities. This national development framework for Wales is divided into four regions. Carmarthenshire is located within the south-western region.

Planning Policy Wales (Edition 12)

- 4.11. PPW (Edition 12, February 2024) sets out the land use planning policies of the Welsh Government (WG). This contains guidance for the preparation of Local Authority's development plans, development management, and sets out the WG commitment to creating sustainable developments.
- 4.12. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015 and the Well-being of Future Generations (Wales) Act 2015.
- 4.13. Chapter 2 of PPW relates to 'People and Places' and seeks to promote the concept of placemaking in both plan making and development management decisions in order to achieve the creation of sustainable places and improve the well-being of communities.
- 4.14. Chapter 4 of PPW (Active and Social Places) emphasises the importance of community spaces for sustaining communities and their well-being. The following paragraphs are pertinent to the consideration of the appeal:
 - Paragraph 4.4.1 states the Welsh Government is fully supportive of communities taking control of assets (which includes schools) where it is appropriate for them to do so and there is local support.
 - Paragraph 4.4.5 states that planning authorities should consider the needs of their communities and the visitors to their places. It is important that people are not excluded from places because the community facilities they need are not available.

- Paragraph 4.5.1 states that recreational spaces are vital for our health, well-being and amenity, and can contribute to an area's green infrastructure. They provide a place for play, sport, healthy physical activity and a place to relax often in the presence of nature, and they contribute to our quality of life.
- Paragraph 4.5.6 requires planning authorities to encourage the multiple use of open space and facilities, where appropriate, to increase their effective use.
- 4.15. Chapter 6 (Distinctive and Natural Places) requires that all planning applications are accompanied by a Green Infrastructure (GI) Statement that is proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. A separate GI Statement supports this appeal. The following paragraphs are pertinent to the consideration of the appeal:
 - Paragraph 6.4.8 requires a proactive and creative approach towards facilitating the delivery of biodiversity and ecosystem resilience outcomes must be taken by all those participating in the planning process (including the third sector and communities) as small scale interventions contribute to a national scale resilience. In particular, planning authorities must demonstrate that they have sought to fulfil the duties and requirements of Section 6 of the Environment (Wales) Act by taking all reasonable steps to maintain and enhance biodiversity in the exercise of their functions.
 - Paragraph 6.4.15 sets out the step-wise approach to biodiversity enhancement. Where there may be harmful environmental effects, planning authorities will need to be satisfied that any reasonable alternative sites (including alternative siting and design options) that would result in less harm, no harm or benefit have been fully considered.
 - Paragraph 6.4.37 states that planning authorities must promote the planting of new trees, hedgerows, groups of trees and areas of woodland as part of new development.
 - Paragraph 6.4.42 states the permanent removal of trees, woodland and hedgerows will only be permitted where it would achieve significant and clearly defined public benefits. Where individual or groups of trees and hedgerows are removed as part of a proposed scheme, planning authorities must first follow the step-wise approach as set out in paragraph 6.4.15. Where loss is unavoidable developers will be required to provide compensatory planting (which is proportionate to the proposed loss as identified through an assessment of green infrastructure value including biodiversity, landscape value and carbon capture). Replacement planting shall be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost and this must be preferably onsite, or immediately adjacent to the site, and at a minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost.

Technical Advice Notes (TANs)

- 4.16. As set out above, PPW is supplemented by a series of Technical Advice Notes (TANs). A range of these apply to the proposed development, and their specific provisions are addressed through the information submitted in support of this appeal. Relevant TANs include:
 - Technical Advice Note 5 (Nature Conservation & Planning) was published in September 2009 and provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation.

- **Technical Advice Note 18 (Transport)** was published in 2007 and recognises the key role of the planning system to facilitate sustainable travel patterns. As in TAN 12, the guidance aims to influence the location of new development to reduce the need to travel and subsequently promote more sustainable forms of transport which contribute to environmental improvement in the longer term.
- Technical Advice Note 23 (Economic Development) was published in February 2014 and focuses on the need to encourage development in order to generate wealth, jobs and income. This TAN recognises the importance of all aspects of development and that planning decisions are made in a sustainable way which balance social, environmental and economic considerations.

Local Planning Policy

Adopted Carmarthenshire Local Development Plan

- 4.17. The Carmarthenshire LDP comprises a range of policies against which all planning applications and appeals are considered. These include the plan's development strategy and its policies on housing, employment, transportation, the environment and leisure.
- 4.18. Taking into account the site's context and applicable designations, the following planning policies of the LDP are considered relevant to the engineering operations that are applied for in 'full' to extend the playing field:
 - Policy SP1 (Sustainable Places and Spaces) the settlement hierarchy directs the majority of new development to the three Growth Areas of Llanelli, Carmarthen and the Ammanford / Cross hands group of settlements. Policy SP1 seeks to distribute development to sustainable locations in accordance with the settlement framework. This policy also seeks the redevelopment of previously developed sites where appropriate.
 - Policy SP13 (Protection and Enhancement of the Built and Historic Environment) states that
 development proposals should preserve or enhance the built and historic environment of the
 County, its cultural, townscape and landscape assets and, where appropriate, their setting.
 - Policy SP14 (Protection and Enhancement of the Natural Environment) states that development should reflect the need to protect, and wherever possible enhance the County's natural environment.
 - Policy SP16 (Community Facilities) supports the provision of new facilities, along with the
 protection and enhancement of existing facilities, in accordance with the settlement framework and
 based upon evidence of need.
 - Policy EQ1 (Protection of Buildings, Landscapes and Features of Historic Importance) relates to proposals for development affecting landscapes, townscapes buildings and sites or features of historic or archaeological interest which by virtue of their historic importance, character or significance within a group of features make an important contribution to the local character and the interests of the area will only be permitted where it preserves or enhances the built and historic environment.
 - Policy EQ6 (Special Landscape Areas) supports proposals which enhance or improve the Special Landscape Areas through their design, appearance and landscape schemes. Whilst not intended to necessarily preclude development, this policy is intended to reflect the emphasis placed upon the

term 'special' in their definition. The design of developments should be sensitive enough to ensure that the scheme makes a positive contribution to the landscape.

- Policy REC1 (Protection of Open Space) seeks to protect and, wherever possible, enhance accessibility to open space. The delivery of appropriate additional open space complies with the Plan's emphasis on facilitating a sustainable level of growth within the County across the plan period. Proposals for new open space provision should be considered in accordance with local evidence of need, Policy SP16, other LDP policies as well as national guidance (including development management issues such as amenity, accessibility and environmental setting). The policy acknowledges that additional development (particularly housing) will place increased demand on existing space and therefore an appropriate level of provision should be secured in accordance with need.
- 4.19. The following additional policies are relevant to the determination of the remaining community benefits package (i.e. the extension to the school, demolition of existing changing rooms, erection of sports pavilion/clubhouse, provision of an all-weather pitch and shared car park), that are being applied for in 'outline' (with all matters reserved for subsequent approval).
 - Policy SP9 (Transportation) requires that development proposals make provision for the delivery
 of an efficient, effective, safe and sustainable integrated transport system.
 - Policy GP1 (Sustainability and High Quality Design) sets out the overarching framework for high design quality in development, conservation and enhancement proposals within the County.
 - **Policy GP4 (Infrastructure and New Development)** supports proposals for development where the infrastructure is adequate to meet the needs of the development.
 - Policy TR2 (Location of Development Transport Considerations) requires that proposals which
 have a potential for significant trip generation will be permitted subject to certain criteria.
 - Policy (EQ4 Biodiversity) protects priority species, habitats and features of recognised principal
 importance to the conservation of biodiversity and nature conservation which could be adversely
 impacted by development proposals.
 - Policy EP3 (Sustainable Drainage) requires that proposals for development demonstrate that the
 impact of surface water drainage, including the effectiveness of incorporating Sustainable Drainage
 Systems (SUDS), has been fully investigated.

Supplementary Planning Guidance (SPG)

4.20. The Council provides a range of Supplementary Planning Guidance (SPG) which comprises detailed guidance on the way in which policies of the LDP will be applied in particular circumstances or areas. The draft Nature Conservation and Biodiversity SPG is relevant to the appeal proposals.

5. Putative Reasons for Refusal

Preface

- 5.1. This section of our statement focuses on the putative reasons for refusal ('PRR') of the hybrid planning application and considers the proposals in the context of the adopted LDP, with specific focus on matters of the principle of development, PPW's step-wise approach to tree removal and net benefit for biodiversity, as referred to in the Council's PRR 01, 02, 03 & 04.
- 5.2. While the Appellant's case described herein primarily responds to the reasons for refusal stated, other matters, including sustainability and community benefit, are discussed on the basis they form material considerations.

PRR 01: Tree removal is not compliant with the step-wise approach

5.3. This section of our statement focuses on the first PRR, which alleges the proposed tree removal is not compliant with Planning Policy Wales' step-wise approach and it has not been demonstrated that all reasonable alternative siting and design options for the scheme, that would result in less harm, have been fully considered.

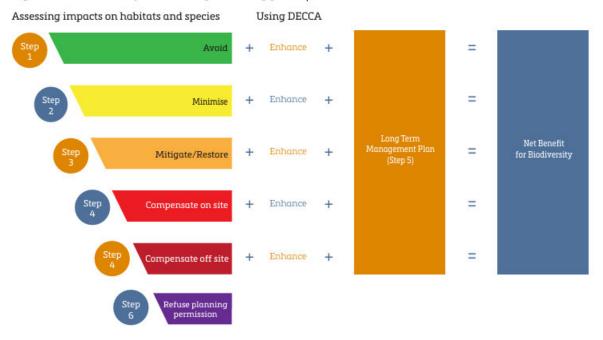
5.4. PRR 01 states that:

"Planning Policy Wales Edition 12 states that where individual or groups of trees and hedgerows are removed as part of a proposed scheme, Local Planning Authorities must first follow the step-wise approach. In this case the Local Planning Authority is not satisfied that the removal of two Category A and four Category B trees is unavoidable and that all reasonable alternative siting and design options for the scheme that would result in less harm have been fully considered. Claims that the removal of these high and moderate value trees is required in order to improve the usability of the playing field have not been justified. The proposal is therefore contrary to Policies SP1, GP1, EQ4 and SP14 of the Carmarthenshire Local Development Plan in that it does not protect and enhance the areas biodiversity and retain important local features."

- 5.5. PRR 01 can be divided in two parts, which we will respond to in turn. This PRR alleges:
 - a) It has not been demonstrated the removal of 2 no. Category A and 4 no. Category B trees is unavoidable and that all reasonable alternative siting and design options have been fully considered, in accordance with PPW's step-wise approach.
 - b) It has not been justified the removal of the trees is required to improve the usability of the playing field.
- 5.6. PPW12, Chapter 6 (Distinctive and Natural Places), paragraph 6.4.42 requires that where individual or groups of trees and hedgerows are removed as part of a proposed scheme, planning authorities must first follow the step-wise approach as set out in PPW12, paragraph 6.4.15. Where loss is unavoidable developers will be required to provide compensatory planting, which is proportionate to the proposed loss (preferably on-site) at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost at a minimum ratio of at least 3:1.
- 5.7. It is important to note the appeal site is not subject to a statutory or non-statutory ecological designation and the trees to be removed are not protected by a Tree Preservation Order nor is the site in a conservation area.

5.8. PPW's step-wise approach to assessing impacts on habitats and species includes six steps. These are summarised by Figure 12 of PPW (Page 148) – copied below.

Figure 12: Summary of the Step-Wise Approach



- 5.9. The priority is to avoid (**Step 1**) damage to biodiversity in its widest sense. The proposals relate to an existing recreational ground and seek to extend the sports pitches to make them more useable. This work involves the translocation of an existing hedge bank. Given the constraints of the site and to ensure suitable space can be provided for the enlarged pitches, the only feasible extension of the pitches is to the north (as proposed). Therefore, it is not possible to completely avoid harm to biodiversity and, instead, consideration falls to minimising harm (**Step 2**).
- 5.10. Step 2 involves consideration of reasonable alternative sites (including alternative siting and design options) that would result in less harm, no harm or benefit should be considered. During the consideration of the application, the Appellant advised that various design scenarios (that included the location of the clubhouse and both pitches) had been considered in the lead up to the submission of the application, settling on the scheme proposed. It was advised essential for the clubhouse to be centrally positioned and located adjacent to the carpark for ease of accessibility and use. The clubhouse will contain the changing rooms and showers, as well as function rooms and food outlet. Positing the building some 100m from the carpark and at the furthest point from one of the pitches would not be practical and would impact useability. Also, divorcing the clubhouse from the existing and other proposed built-form (i.e. school, car park, all-weather pitch) may raise concerns regarding its visual impact, since it would move it into the open and would result in the need for more infrastructure, in the form of pathways to cater for pedestrian movements without churning the grounds and potentially a road to enable servicing and provision of access for disabled users.
- 5.11. The appeal proposals have sought to minimise the initial impact on biodiversity and ecosystems and, in addition, mitigation and restoration (**Step 3**) is proposed to limit the negative effects of a development. In this regard, an Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) have been prepared (Document 17), detailing precautions and protection measures to minimise direct and indirect impacts of the scheme during operation and construction. Details of new tree planting mitigates unavoidable negative

- impacts and sufficiently compensates (**Step 4**) for the minimal number of trees to be removed to facilitate the planned improvements to the sports pitches.
- 5.12. Given the nature of the appeal site and space available, on-site compensatory planting and habitat creation is proposed, together with long-term management to enhance existing habitats and deliver a net benefit for biodiversity. In this regard, the Appellant has committed to planting 8 no. semi-mature trees of 35 40cm girth with a height of 6.5 8 meters of native variety and a further 10 no. trees of the same type and size in suitable locations within the recreation ground the locations can be controlled by condition. Therefore, a total of 18 no. new trees are proposed by way of compensation for the unavoidable removal of 6 no. trees. The Green Infrastructure Statement (GIS) (Document 10) that supports this appeal details the compensatory planting measures (albeit this has since been expanded through dialogue with the Council) and the significant opportunity the appeal proposals present for the enhancement of an existing green space. This is accompanied by a Green Infrastructure Plan (Appendix 1 of the GIS) that describes how the existing and proposed green infrastructure is integrated into the proposals for the site.
- 5.13. The proposals also include long-term management (**Step 5**) in the form of tree protection measures, a maintenance schedule for the newly proposed trees to be planted. Collectively, the proposals present and demonstrate a net benefit for biodiversity. PRR 01 is, therefore, unfounded.

PRR 02: Tree removal not off-set by public benefits

5.14. This section of our statement focuses on the second PRR, which alleges the proposed tree removal is not offset by the proposed public benefits of the scheme, which the Council allege are theoretical rather than tangible. It further alleges that, given these public benefits are not achievable within the lifetime of the planning permission, only limited weight can be attributed to them.

5.15. PRR 02 states that:

"Planning Policy Wales Edition 12 states that the permanent removal of trees, woodland and hedgerows will only be permitted where it would achieve significant and clearly defined public benefits. The Local Planning Authority considers that the proposed public benefits, namely the extension to the school, car parking and all weather pitch, are not demonstrably achievable within the lifetime of any planning permission, given that the applicants intention is to provide the land to the County Council who have no tangible plans or the necessary funding to carry out any of these developments, the school currently operating at 45% of its current pupil capacity. Similarly, the proposed changing rooms are not being delivered by the applicant who proposes to transfer the land to the Laugharne Corporation who would be responsible for seeking funding for the development. These potential public benefits are considered to be theoretical benefits rather than tangible, achievable benefits and are therefore afforded little weight as they do not constitute significant and clearly defined public benefits. The provision of approximately 110m of footway linking Laugharne and Broadway is a potential public benefit but in itself is not sufficiently significant to outweigh the unacceptable loss of high and moderate value trees. The proposal is contrary to Policies SP1, GP1, EQ4 and SP14 of the Carmarthenshire Local Development Plan in that it does not protect and enhance the areas biodiversity and retain important local features."

- 5.16. Paragraph 6.4.42 of PPW states "... the permanent removal of trees, woodland and hedgerows will only be permitted where it would achieve significant and clearly defined public benefits". Importantly, PPW does not, therefore, preclude the removal of trees provided the step-wise approach is followed.
- 5.17. PPW further states that "... where loss is unavoidable developers will be required to provide compensatory planting...". The Appellant has demonstrated the loss of 6 no. trees is unavoidable to ensure useable sports

- pitches can be provided to cater for and promote a variety of grassroots sports, which are a vital part of community development, promoting physical activity, social interaction, and health. Compliance with the step-wise approach has also been demonstrated in the preceding section.
- 5.18. The proposals are considered to provide significant public benefit. There has been a long-term aspiration by the community of Laugharne to undertake works to the playing field to make it a useable community asset, which could not be realised without a long-term lease or ownership of the land this is now possible. The existing changing rooms are dated and not fit from purpose. Therefore, the opportunity for a new sports pavilion/clubhouse will provide important benefits for users, as will the provision of the land for an all-weather pitch and car park that can be shared by the school and recreational ground. The Primary School has reached capacity and is in much need of an extension to cater for Laugharne's growing population; providing the land for this is the key to meeting the educational needs of local children.
- 5.19. The Council allege the extension to the school, car park, sport pavilion/clubhouse and all-weather pitch are not demonstrably achievable within the lifetime of any planning permission (presumably a 5-year permission would be granted). The Council further state the Appellant's intention is to provide the land to the County Council and Laugharne Corporation (a community body) who have no tangible plans or the necessary funding to carry out any of these developments.
- 5.20. The Appellant appreciates that funding is needed to deliver the extension to the school, changing rooms, clubhouse, car park and all-weather pitch. However, whether funding is available is not a matter that can be controlled through the planning process. The appeal proposals will merely release the land for the delivery of the various developments, which can then be progressed as and when monies become available. This approach to the determination of planning applications has been confirmed by case law. In particular, and as stated in the case of 'British Railways Board v Secretary of State for the Environment [1994]', the question of whether a proposal can be implemented is irrelevant to the decision whether to grant permission. The case law goes on to state "... there is no legal requirement that planning permission be refused unless a developer commits itself to implementing a proposal." Also, that "The issue of deliverability was not legally relevant to the refusal of planning permission, at least on the reasoning provided. It was relevant to the achievement of the benefits of course, but would be equally relevant to the absence of impact. But if the benefits were not provided, then neither would the impacts arise"
- 5.21. In terms of the school extension, the Appellant is offering to gift the land to the Council for the benefit of education provision. It is anticipated the required area of land will be demarcated and secured via a section 106 agreement.
- 5.22. The sport pitches and land required for the other development proposals, will be transferred to the Laugharne Corporation (a registered Charity (no. 218121) which has held land on behalf of the people of Laugharne for over 700 years. See Charity Commission web site https://register-of-charitycommission.gov.uk/en/charity-search/-/charity-details/218121/governing-document. In turn, the Corporation will lease the playing field to Laugharne Athletic Club. This will safeguard the land within the community. Currently and historically, there was no lease on the playing field, which prevented any grant funding. A long lease from a holding body (such as The Laugharne Corporation) will allow grant funding (National Lottery, Sports Council Wales, etc) to make essential improvements and allow construction of a sports pavilion/club for the community.
- 5.23. It is the Appellant's view the matter of whether funding is available for the various developments proposed should not be a reason to refuse planning permission. The Appellant is merely seeking to unlock the development potential for the long-awaited and necessary improvements to the recreational ground and school extension to be delivered.

- 5.24. The Council allege the school is currently operating at 45% of its current pupil capacity. However, the Appellant understand that CCC Education has had a long-term aspiration to extend the primary school. This was confirmed at the pre-application meeting with the Council held on 21 February 2024 (see the meeting minutes Document 19c). During this meeting, the Council confirmed Laugharne is a priority investment area.
- 5.25. The Welsh Government summary for Laugharne VCP School demonstrates there were 68 pupils in 2024 (https://mylocalschool.gov.wales/School/6693003?lang=en) against a capacity of 104 pupils, this equates to 65% rather than the 45% alleged by the Council. The capacity is confirmed by the 'primary school places data 2022' (included at Appendix 4), which showed there was a 29.8% surplus capacity in 2022.
- 5.26. The nearest alternative primary school is in Llanmiloe. The Appellant understands the Council considered closing Llanmiloe School in 2016/17 and extending Laugharne VCP School to accommodate the pupils. This is demonstrated by the extract copied below of the Council's Modernising Education Programme (MEP) Progress Report (December 2017). These plans were, however, put on hold due to land ownership issues (i.e. the land was not available to enable the extension of Laugharne VCP). The Appellant is proposing to remove this obstacle as part of this appeal.

Carmarthenshire County Council Modernising Education Programme (MEP) Progress Report to December 2017



Project Name	Project Type	School(s)	Project Description	Statutory Consultation Process Status	Business Cases Status	Design / Construction Status	Project RAG Rating	Issues
Band A Projects			·				-	
Strade Phase 1	Investment.	Strade	Multi extension and refurbishment project	N/A	Complete	Complete	Green	None
Carreg Hirfaen	Investment	Carreg Hirfaen	Invest to provide new School premises	N/A	Complete	Complete	Green	None
Burry Port	Investment	Burry Port Infants and	Establish new primary school to replace Burry Port Infants	Complete	Complete	Complete	-	None
135		Juniors	and Burry Port Junior schools. Invest to provide modern facilities.				Green	
Pen Rhos (formerly Seaside)	and Investment		Establish a new primary school at Seaside to replace the existing Lakefield Primary School and Copperworks Infants.	Complete	Complete	Construction in progress Occupation April 2018.	Green	None
Llanelli Vocational Village	Investment	Bryngwyn, Glan Y Mor, St John Lloyd, Strade, Coedoae	Multi edension and refut/bitment project Bryggyn - Construction bilds centre: Glan V Mar - Child care. Vocational elements for St. John Lbyd, Coedcee & Strade included as part of larger Bland A schemes.	N/A	Complete	Glan Y Mor - Complete Bryngwyn - Complete Strade - Completed as part of main Band A Scheme Coedcae - Completed as part of main Band A Scheme BJ John Lloyd - Being completed as part of main Band A Scheme	Green	None
Trimperen	Investment	Trimaaran	Invest to provide new School premises	N/A	Complete	Construction nearing completion	Green	None
Coedcae Phase 1	Investment	Coedcae	Multi extension and refurbishment project	N/A	Complete	Complete	Green	None
Parc Y Tywyn	Investment	Parc y Tywyn	Invest to provide modern facilities	Statutory process to increase age range of school from 4-11 to 3-11 in progress.	Complete	Construction in progress	Green	None
Llangadog (Cwm Tywl East)	Reorganisation and Investment	Llangadog, Llansadwm, Llanwrda	Review the future provision of education in the area served by the school as part of a wider strategic review to include Llangadog, Ulansadwm, Llanwrda. Invest in chosen solution	Llansadwm and Llanwrda Schools closed formally in April 2017,	Complete	Construction to commence January 2018.	Green	None
Rhydygors	Investment	Rhydygors Rhydygors Day Unit Canolfan Y Gors	Investment to provide modern facilities on the Rhydygors site	N/A	BJC required	Project on hold pending conclusion of Behavior Services Review Proceeding with essential maintenance only	Red	Managing Stakeholder expectations
Dewi Sant	Investment	Dewi Sant	Invest to provide new School premises	N/A	SOC Approved OBC Approved FBC to be submitted early 2018.	Planning PAC completed Scheme to be submitted for planning early 2018.	Red	Opposition to preferred site - Llanerch playing fields Village Green application submitted - Public engulity to be held in April 2018
Gorslas	Reorganisation and investment	Gorslas with implications for Maesybont	Invest in new school premises in the Gorslas	Statutory process to increase size of school to 210 in progress	SOC approved OBC/FBC required	Scheme design in progress Planning PAC completed	Green	Land ownership and covernant issues to be resolved
Pontyberem	Investment	Pontyberem with implications for Bandfosfelen	Invest to provide modern facilities	N/A	BJC approved	Construction in progress	Green	None
Rhys Pritchard	Investment	Rhys Pritchard	Investment to relocate Ysgol Rhys Pritchard to former Pantycelyn School site	N/A	BJC being prepared	Scheme design in progress	Green	None
Laugharne VC	Reorganisation and Investment	Laughame, Tremiolet, Llanmiloe	Investment to modernise Laughanne VC School to accommodate Tremollet and Llanmiloe Schools	Not Started - TBC following resolution of land issues.	BJC required	Scheme design on hold pending conclusion of land issues.	Red	Land aquisition required Scheme dependant on reorganisation of schools
St John Lloyd Phase 1	Investment	St John Lloyd Phase 1	Multi extension and refurbishment project	N/A	Complete	Construction nearing completion.	Green	None
Accelerated Band B Projects		and the second second						
Heol Goffe	Investment	Heal Goffe	Invest in new school premises	Full statutory consultation required - Not started	SOC & OBC/FBC required	Scheme design in progress	Green	None
Kidwelly - Y Castell	Investment	Y Castell	Invest in new school premises	N/A	SOC & OBC/FBC required	Scheme design in progress	Green	None
Pembrey	Investment	Pembrey	Invest to provide modern facilities	N/A	SOC Approved OBC/FBC required	Scheme design in progress	Green	None
Five Roads	Investment	Five Roads	Invest in existing premises.	N/A	BJC required	Scheme design in progress	Amber	Land acquisition imminent.

Please Note: The Modernising Education Programme is reviewed on a regular basis and is liable to change over time.

5.27. The capacity of Llanmiloe School is 59 pupils (as demonstrated by the 2022 data at Appendix 4). However, the school is oversubscribed by 18.6%. Were Llanmiloe School to close, Laugharne VCP School would not currently be able to accommodate the pupils from both schools currently (totalling 127 at 2024) without an extension.

- 5.28. Pupil numbers are only likely to increase in time as further developments take place in the area. In particular, there is a development of 42 dwellings (known as Clos Hugdon) underway by the Appellant on the land adjacent to Laugharne VCP School. This comprises family housing that will increase the demand for school places in the area.
- 5.29. As part of PRR 02, the Council acknowledge the provision of approximately 110m of footway linking Laugharne and Broadway is a potential public benefit. However, it is further stated this in itself is not sufficiently significant to outweigh the unacceptable loss of high and moderate value trees. In view of the Appellant's commentary above, the footway and the remaining package of community benefits must be considered in their totality. The proposals would, therefore, achieve significant and defined public benefit that outweigh the removal of 6 no. trees that are sufficiently compensated for. The public support for this is showcased by the 205 representations supporting the proposals.

PRR 03: Net benefit for biodiversity

5.30. This section of our statement focuses on the third PRR, which alleges the proposals have not demonstrated how a net benefit for biodiversity (NBB) will be secured.

5.31. PRR 03 states that:

"Section 6 of the Environment (Wales) Act 2016 places a duty on public authorities to 'seek to maintain and enhance biodiversity' so far as it is consistent with the proper exercise of those functions. In so doing, public authorities must also seek to 'promote the resilience of ecosystems'. Future Wales, The National Plan 2040 (Policy 9) requires the Local Planning Authority to seek to enhance biodiversity through the planning process, The proposed development does not demonstrate how a net benefit for biodiversity will be secured. The development would result in the loss of two Category A and four category B trees and a loss of 55.7% canopy cover to be replaced by eight 1.5m high feathered whips within the translocated hedgerow, which equates to a significant net loss of biodiversity. The proposal is therefore contrary to Policies SP1, GP1, EQ4 and SP14 of the Carmarthenshire Local Development Plan as well as Policy 9 of Future Wales: The National Plan and the Section 6 duty."

- 5.32. Paragraph 6.4.3 of PPW recognises that development needs to take place and some biodiversity may be impacted. It goes on to state "...the planning system should ensure that overall there is a net benefit for biodiversity and ecosystem resilience, resulting in enhanced well-being."
- 5.33. Paragraph 6.4.5 of PPW expands on this by stating "A net benefit for biodiversity is the concept that development should leave biodiversity and the resilience of ecosystems in a significantly better state than before, through securing immediate and long-term, measurable and demonstrable benefit, primarily on or immediately adjacent to the site."
- 5.34. At a local level, Policies SP14 (Protection and Enhancement of the Natural Environment) and EQ4 (Biodiversity) of the Carmarthenshire LDP are pertinent.
- 5.35. The recreational ground and school are not subject to any statutory or non-statutory ecological designations. Nevertheless, the recreational ground, by its nature, is grassed and the peripheries are vegetated. A hedgerow forms the northwestern boundary of the playing field that backs onto a small parcel of semi-improved grassland that is becoming rank in the absence of management. In order to extend the playing field this hedgerow (150m in length) will need to be relocated approximately 25m northwest. Some trees around the boundary of the playing field also need to be felled.

- 5.36. In April 2023, I&G Ecology carried out an ecological desk study of the site and assessed the existing hedgerow against the ecological criteria contained in the Hedgerow Regulations 1997. The assessment found no evidence of badger within or adjacent to the hedgerows. Dormouse are absent from this area of Carmarthenshire, and the hedgerows were suboptimal for dormouse based on their structure, management and connectivity. The hedgerow has the potential to be utilised by bats as flight lines and for foraging, and the veteran Ash tree in the northeast corner has bat potential. The 4 no. other mature trees within the hedgerow did not appear to have features that would support bat roosting opportunities other than a good covering of Ivy. In combination with the absence of desk study records for such species within the site, the report, therefore, concluded the hedgerow does not meet the criteria to be considered 'important' under the Wildlife and Landscape Criteria of the 1997 Hedgerow Regulations (Schedule 1, Part II). Nevertheless, it is acknowledged that hedgerow removal should offset any losses through the creation of new habitats and wildlife linkages which preserve and, where possible, enhance habitat connectivity within and around the site. Accordingly, a 'Hedgerow Translocation, Creation and Aftercare Method Statement' (April 2023) (Document 13) accompanies this appeal and provides details of the proposed hedgerow translocation, together with additional planting and maintenance measures.
- 5.37. Dialgoue with the Council during the application process resulted in the Appellant increasing the proposed compensatory planting to 18 no. trees. Alongside this, the Green Infrastructure Statement (GIS) (Document 10) that supports this appeal details the compensatory planting measures (albeit this has since been expanded through dialogue with the Council) and the significant opportunity the appeal proposals present for the enhancement of an existing green space. This is accompanied by a Green Infrastructure Plan (Appendix 1 of the GIS) that describes how the existing and proposed green infrastructure is integrated into the proposals for the site.
- 5.38. In respect of the trees to be felled on the peripheries of the site, I&G Ecology undertook a 'Tree Survey of Bat Potential' in June 2023 (Document 14). Since the trees were identified as having moderate potential for roosting bats, two activity surveys were suggested to confirm bat use or not. Following these surveys, no bat roosts or their signs were found. The trees surveyed had light lvy cover on the main trunks and some had scarring from previous tree work or damage to the trunks from broken limbs. There are other trees in proximity to the site that may offer roosting potential should a bat be seeking a place of shelter and protection. There are therefore currently no bats using the trees and no ecological constraints to the proposed works.
- 5.39. Overall, the appeal documents demonstrate the proposals present significant opportunity for ecological enhancement and appropriate long-term management of green infrastructure, in accordance with the requirements of PPW12 and LDP Policies SP14 and EQ4.

PRR 04: Extension of the sports pitches

5.40. This section of our statement focuses on the fourth PRR, which alleges the proposals have not demonstrated the extension of the sports pitches is necessary to improve their usability and the land raising operations amount to an unsustainable form of development in the open countryside.

5.41. PRR 04 states that:

"The applicant has not demonstrated that extension of the sports pitches is necessary to improve their usability or why the existing pitches are substandard. The land raising operations therefore amount to unsustainable form of development in the open countryside contrary to Policy SP1 of the Carmarthenshire Local Development Plan and contrary to the principles of the sustainable management of natural resources as defined in the Environment (Wales) Act 2016."

5.42. PRR 04 can be divided in two parts, which we will respond to in turn. This PRR alleges:

a) It has not been demonstrated that the extension of the sports pitches is necessary to improve their usability or why the existing pitches are substandard.

The Appellant contends the sports pitches need to be extended. The existing rugby pitches do not meet the minimum size requirements. World Rugby state the minimum size is 94m to 100m in length and 68m to 70m in width. In addition, the in-goal area should be 6m to 22m at each end. The existing pitches fall short of these standards. The main pitch 1 (west) measures 67m x 88m and the second pitch 2 (east) measures 61m x 88m, both with the minimum in-goal area of only 6m do not meet that standard. The playing field extension will also allow for a football field to be laid out (91m - 119 in length by 46m-91m in width) or a hockey pitch (91.4m x 55m). The existing cricket field can only accommodate a diameter of 115m from the cricket pitch; the normal requirement for men's cricket is 140m to 150m. The field that is indicated on the proposed drawings shows the maximum achievable size having a diameter of 130m.

In addition to the substandard size of the pitches for a variety of sports, the pitches have poor drainage that restricts use following inclement weather. If they are used following rainfall, the surface is badly damaged which further harms their useability. The pitches are also not level, with a cross fall of over 1m side to side and over 1m front to back.

Useability of the pitches is also affected by the fact the there is no lease on the land. This means there has been no prospect of raising funds to improve the drainage or level of the fields. Even if funding became available, the size of the sports pitches would be smaller than recognised by most sport standards.

The Carmarthenshire Pitch Sports Facilities and Clubs Vision Plan (April 2024) (included at Appendix 5), prepared by the Council, sets out the vision for clubs and facilities common to all sports. These include (amongst other matters), developing better quality, fit for purpose facilities for all, and supporting strong sustainable clubs with their own pitches and pavilions. This document also sets out the challenges for grass pitch sports, referencing their poor quality and drainage/flooding.

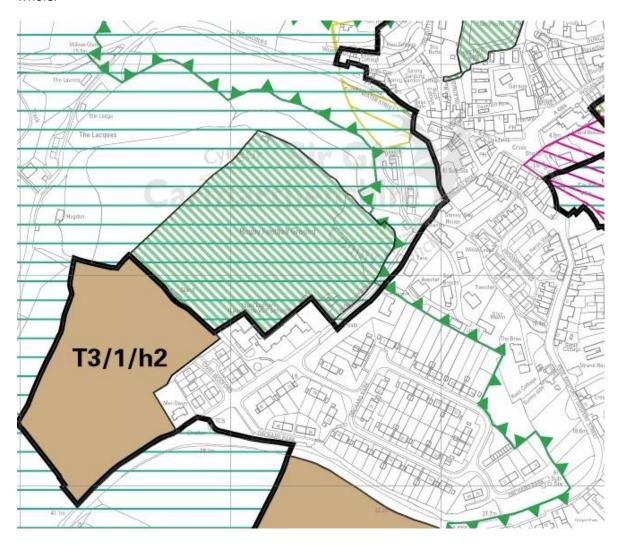
Specifically in respect of rugby (the national sport), this document references a review of sports facilities commissioned by the Welsh Rugby Union (WRU) in 2022. The review consultation reported that facility improvements were highlighted as the most important topic to address over the next few years. Especially in rural areas and the north, 33% of those surveyed rated rugby facilities in the area as poor and very poor. Survey respondents highlighted the importance of good facility and expressed a strong preference towards grass pitches as the priority surface with the priorities including: improving quality of grass pitches; club house improvements; floodlights; access to more grass pitches for training to protect match pitches.

The Council's Public Open Space Assessment Technical Report (January 2024) (included at Appendix 6), prepared to inform the Revised LDP, recognises that sports facilities need to be of sufficient size to enable effective use and are to be provided in accessible locations. The Technical Report notes Laugharne has 6.23 hectares of outdoor sports provision across 2 sites. However, this does not consider the quality and useability of the provision. The proposals seek to provide much needed improvements to the facilities and a footpath link between Broadway and Laugharne, encouraging connectivity, together with space for extra parking and quality facilities to maintain longevity and generally encourage continued use.

This evidence clearly demonstrates the necessity to extend the sports pitches to ensure their current and future useability. This is supported by The Well-being and Future Generations Act (2015), one of the key goals of which is to make a healthier Wales. The Act highlights the aspiration for a society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood. This goal is embodied by the appeal proposals.

b) The land raising operations amount to an unsustainable form of development in the open countryside.

The area of land proposed to be raised to extend the sports pitches is designated by the LDP Proposals Map (extract below) as falling outside the settlement boundary for Laugharne, within an area of countryside. However, the land is not 'open' countryside and, whilst it sits outside the settlement boundary, it is adjacent to an area of recreation / open space identified in the LDP. The recreational ground forms part of the appeal site to which the land raising would be directly related. For this reason, the engineering operations would be consistent with the current landscape character and would not be detrimental to the character or appearance of the area as a whole.



The land raising does not propose built-form and, instead, represents an extension of the adjacent recreation designation in the LDP. The area of land to be raised would be laid to grass and would, therefore, not have an urbanising effect that may otherwise impact the land's visual openness. The

proposals would, therefore, relate closely to the existing adjacent land use and would not result in an incongruous development.

5.43. Overall, the Appellant has demonstrated the extension of the sports pitches is wholly necessary to improve their usability and the land raising operations, which represent an essential element of the proposals, will be viewed in the context of the wider site's established recreational use, not resulting in demonstrable harm to the character, appearance or openness of the area. PRR is, therefore, unfounded.

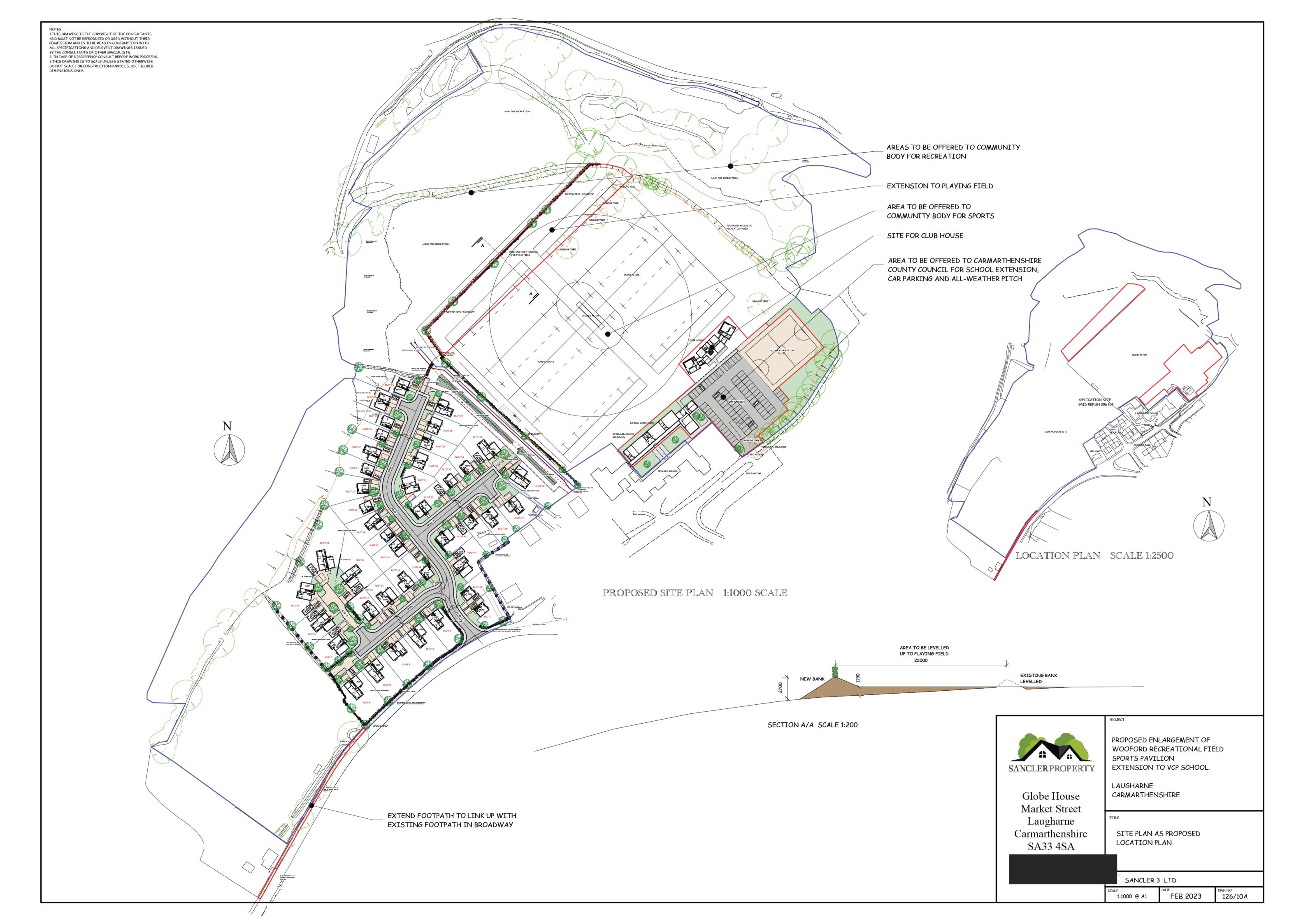
6. Summary & Conclusions

- 6.1. This appeal has been lodged against the decision of Carmarthenshire County Council to refuse to grant full planning permission for engineering operations to extend the Laugharne playing field by approximately 22m in length and 154m in width to improve its useability (land parcel 1) and outline planning permission (with all matters reserved for subsequent approval) for a much-needed extension to Laugharne Primary School, together with the demolition of the existing recreational ground changing rooms, erection of a new sports pavilion/clubhouse, the provision of an all-weather pitch and 82 no. space car park to be accessed via the recreational ground's existing point of access for the shared use of the school and playing field users.
- 6.2. In the lead up to the submission of the planning application, engagement was undertaken with site stakeholders, the local community and the Council to explain the merits of the proposal. The preapplication process undertaken consisted of council and community meetings, which reflects the Appellant's on-going commitment to respond to the social, educational and cultural needs of the area which is to, ultimately, deliver a sustainable development which meets an identified community need and is in line with The Well-being of Future Generations goals and the placemaking outcomes of PPW12.
- 6.3. The appeal proposals to extend Laugharne Primary School and the playing field that forms part of Laugharne's recreational ground, together with the provision of associated recreational facilities, represents a significant opportunity for the community that simply must be taken. There has been a long-term aspiration by the community of Laugharne to undertake works to the playing field to make it a useable community asset, which could not be realised without a lease or ownership of the land. The existing changing rooms are dated and not fit from purpose. Therefore, the opportunity for a new sports pavilion/clubhouse will provide important benefits for users, as will the provision of the land for an all-weather pitch and car park that can be shared by the school and recreational ground. The Primary School is in much need of an extension to cater for Laugharne's growing population and a potential mrger with Llanmiloe school; providing the land for this is the key to meeting the educational needs of local children.
- 6.4. In light of the site's existing use as a recreational ground and the presence of the primary school, the proposals are acceptable in land use planning terms and present a significant opportunity for much needed community benefit. The proposals will not result in undue harm (without proportionate compensation) to features of acknowledged importance; namely matters of visual amenity, ecology or trees.
- 6.5. The putative reasons for refusal have been fully and comprehensively addressed in this appeal statement and do not, in our opinion, warrant the dismissal of the appeal. The community benefit is significant, and combined with the material considerations in favour of the proposal which are detailed in this statement, the exercise of the 'planning balance' suggests that the proposals are entirely acceptable.
- 6.6. In conclusion, it is the Appellant's view that the appeal proposals are in accordance with planning policy, and are supported by a number of compelling material considerations:
 - The proposals will deliver suitable sized playing field to cater for a variety of sports that will widen the recreation ground's community offer.
 - The proposals will make the best and most effective use of community facilities.
 - The provision and formalisation of a car park will alleviate parking pressures in the area associated with the existing use of the recreation ground and school.

- The replacement of the dated and substandard recreation ground changing rooms and provision of an all-weather pitch will enhance the facility's service offer and promote longevity of sports clubs.
- The offer of the land to the Council to enable the delivery of an extension to Laugharne Primary School will enable the delivery of the Council's Modernising Education Programme and cater for the existing and growing community's population.
- The engineering operations required to extend the playing field represent a sustainable form of development and would not be demonstrably harmful to the countryside given the existing established use of the site and its location to the rear of the recreation ground away from public vantage points.
- The removal of 6 no. trees to facilitate the community benefits package is suitably justified and mitigated for, in accordance with PPW's step-wise approach and offers the opportunity for a net benefit for biodiversity.
- Obstructing developments such as these is clearly not the intention of the Welsh Government or the Council through PPW or the LDP.
- 6.7. Given the above summary and conclusions, it is considered that all reasonable efforts to secure planning permission from the Council have been exhausted. The exercise of the 'planning balance' results in a scheme which is acceptable and will provide significant community benefit. We therefore respectfully ask the Inspector to allow this appeal and grant planning permission for this development.

Appendix 1

Site Location Plan



Appendix 2

Application Decision Notice (LPA Reference PL/07630)



TOWN AND COUNTRY PLANNING ACT 1990

Decision Notice

Refusal of Full Planning Permission

Applicant

c/o agent Avison Young (UK) Limited One Kingsway Cardiff CF10 3AN

Application No: PL/07630 registered on 21/05/2024 for:

Proposal: Hybrid application seeking full planning permission for an extension to playing

fields and outline planning permission for the demolition of existing changing rooms, erection of sports pavilion/clubhouse, extension to Laugharne Primary

School, provision of an all-weather pitch and shared car park

Laugharne Vcp School, Laugharne, Carmarthen, SA33 4TE

Application Type: Full planning permission

Carmarthenshire County Council hereby **REFUSE FULL PLANNING PERMISSION** for the development proposed by you as shown on the application form, plan(s) and supporting document(s) for the following reason(s):

Reason 1

Planning Policy Wales Edition 12 states that where individual or groups of trees and hedgerows are removed as part of a proposed scheme, Local Planning Authorities must first follow the step-wise approach. In this case the Local Planning Authority is not satisfied that the removal of two Category A and four Category B trees is unavoidable and that all reasonable alternative siting and design options for the scheme that would result in less harm have been fully considered. Claims that the removal of these high and moderate value trees is required in order to to improve the usability of the playing field have not been justified. The proposal is therefore contrary to Policies SP1, GP1, EQ4 and SP14 of the Carmarthenshire Local Development Plan in that it does not protect and enhance the areas biodiversity and retain important local features.

Reason 2

Planning Policy Wales Edition 12 states that the permanent removal of trees, woodland and hedgerows will only be permitted where it would achieve significant and clearly defined public benefits. The Local Planning Authority considers that the proposed public benefits, namely the extension to the school, car parking and all weather pitch, are not demonstrably achievable within the lifetime of any planning permission, given that the applicants intention is to provide the land to the County Council who have no



tangible plans or the necessary funding to carry out any of these developments, the school currently operating at 45% of its current pupil capacity. Similarly, the proposed changing rooms are not being delivered by the applicant who proposes to transfer the land to the Laugharne Corporation who would be responsible for seeking funding for the development. These potential public benefits are considered to be theoretical benefits rather than tangible, achievable benefits and are therefore afforded little weight as they do not constitute significant and clearly defined public benefits. The provision of approximately 110m of footway linking Laugharne and Broadway is a potential public benefit but in itself is not sufficiently significant to outweigh the unacceptable loss of high and moderate value trees. The proposal is contrary to Policies SP1, GP1, EQ4 and SP14 of the Carmarthenshire Local Development Plan in that it does not protect and enhance the areas biodiversity and retain important local features.

Reason 3

Section 6 of the Environment (Wales) Act 2016 places a duty on public authorities to 'seek to maintain and enhance biodiversity' so far as it is consistent with the proper exercise of those functions. In so doing, public authorities must also seek to 'promote the resilience of ecosystems'. Future Wales, The National Plan 2040 (Policy 9) requires the Local Planning Authority to seek to enhance biodiversity through the planning process, The proposed development does not demonstrate how a net benefit for biodiversity will be secured. The development would result in the loss of two Category A and four category B trees and a loss of 55.7% canopy cover to be replaced by eight 1.5m high feathered whips within the translocated hedgerow, which equates to a significant net loss of biodiversity. The proposal is therefore contrary to Policies SP1, GP1, EQ4 and SP14 of the Carmarthenshire Local Development Plan as well as Policy 9 of Future Wales: The National Plan and the Section 6 duty.

Reason 4

The applicant has not demonstrated that extension of the sports pitches is necessary to improve their usability or why the existing pitches are substandard. The land raising operations therefore amount to unsustainable form of development in the open countryside contrary to Policy SP1 of the Carmarthenshire Local Development Plan and contrary to the principles of the sustainable management of natural resources as defined in the Environment (Wales) Act 2016.

Note 1

This application has been determined within the scope of the delegated authority granted to the Head of Place & Sustainability by the Meeting of Carmarthenshire County Council on 9 February 2022 (Minute No 5.1 refers).

DATED: 11/02/2025

Rhodri Griffiths

Pennaeth Lle a Chynaliadwyedd / Head of Place and Sustainability



Please Note

The following details include important information on your right to appeal this decision

Appeal a planning decision

You can appeal a planning decision if either: you disagree with it, or the decision was not made within 8 weeks. If you disagree with a decision, you must appeal within 6 months of the date on the decision notice from your local planning authority.

Appeal a minor commercial development decision

You can appeal a minor commercial development decision if you disagree with it. For example, ground floor alterations like shop fronts and security shutters. You must appeal within **12 weeks** of the date on the decision notice from your local planning authority.

- Only the person who made the planning / commercial development application can appeal.
- There's no fee for appealing.
- If you've received an enforcement notice you must appeal within 28 days of the notice. https://www.gov.wales/appeal-planning-enforcement-notice

How to complete and Submit your Appeal

You can find appeal forms here: https://www.gov.wales/planning-appeal-form. If you want to appeal more than one decision you must make a separate appeal for each. Make your appeal to Planning and Environment Decisions Wales (PEDW) by post or email:-

Planning and Environment Decisions Wales (PEDW), Crown Buildings, Cathays Park, Cardiff, CF10 3NQ. Email: <u>PEDW.Casework@gov.wales</u> / Telephone: 0300 0604400

You can find more detailed information about the types of appeals, the procedures, and purchase notices on the Welsh Government's website: https://gov.wales/planning-appeals

Appendix 3

Minutes of Meeting with Council Officers (21 February 2024)

CYFARFOD | MEETING:

Laugharne developments meeting

DYDDIAD | DATE:

21.02.2024



Attendees: Carl Thornton (CT) – Property Developer Representing Sancler 3 LTD, Hugh Towns - Senior Development & Enforcement Manager (HT), Hywel Humphries – Senior Valuer (HH), Mike Southall (MS) – Property Developer Representing Sancler 3 LTD, Rhodri Griffiths - Head of Place & Sustainability (RG), Sara Griffiths – Modernisation Team Manager (SG), Simon Davies – Head of Access to Education (SD), Stephen Kirkwood (SK) - Landowner.

SK provided update that since December he has acquired ownership of the land in Laugharne, presenting opportunities for community development, educational initiatives, recreational activities, and improvements to highways. Stephen expressed his interest in understanding the authorities' stance on these matters and wishes to discuss potential steps moving forward.

SD noted that the Laugharne development scheme has been under consideration for a number of years and that it is currently included in an investment programme that is being re-evaluated. Prior to the onset of the COVID-19 pandemic, there were plans to review and develop a revised programme by 2020. Laugharne was classified as a band A project. Currently, works are underway to consult with the Cabinet on the strategy for the entire Modernising Education Programme (MEP) of investment moving forward. The Cabinet is deliberating on prioritizing investments; however, it is noted that there are significant reductions in capital funding at present. Despite the challenges posed by the reduction in funding, it is suggested that Laugharne remains a priority for investment.

SK adds that the land access issue will no longer impede progress with the project if there is a desire to move forward. He has states that he has also taken on ownership around the recreation field and land leading up to Broadfield.

MS, as property developer representing Sancler 3 LTD, presented an overview of the current situation that with current plans there is an obligation to build 13 affordable houses, along with other improvements and a highway link. A viability exercise was conducted along with an offsetting exercise. The proposal involves offsetting the affordable housing obligations by offering alternative community benefits including the transferring of land for the extension of the school.

RG advised that consideration of any planning matters would be addressed separately from any potential commercial proposal related to the land. Regarding the affordable homes policy, it was noted that there is a possibility for it to be commuted depending on the circumstances. However, any decision regarding this matter would need to be made by the authority and justified as a corporate entity.

Property developer CT, distributes plans and indicates that there is an option to reapply for permissions for the housing estate that they already have consent for, extending the boundary line to include additional land. Another option is to put in a new need planning application to build the clubhouse and expand the school with a Section 106 modification agreement.

MS clarifies that the option to modify section 106 would be a formal application. Alongside that would be an application for the extension to the school and the clubhouse. The viability would be used as evidence of why to offset obligations.

RG notes that it would be imperative to demonstrate to the Local Planning Authority, who set the local planning policy, and the Welsh Government, who set the national planning policy, that there was a justification for moving away from affordable housing and reiterates that the case must be strong for deviating from the requirements.

SK points out that the community benefits associated with affordable housing are being balanced out by other offerings in terms of community improvements, recreation, and education initiatives.

MS adds that an application was made back in 2009 including the community benefits pack and was backed by the community who were massively on board, town council were also supportive.

SD notes that there is a longstanding interest in the project and the land transfer would be beneficial to this, however, the current viability of the extension hinges on securing funding and obtaining Cabinet support.

HH notes that new houses will increase the demand for school placements. The alternate section 106 will allow for the build of the extension however as MEP is currently under review for prioritisation next steps forward are tentative.

RG suggests MS/SK/KT consider the business case. Additionally advising that a discussion with Welsh Government follows regarding affordable housing and what, as the national planning authority, it finds acceptable.

HT adds that the ultimate decision would likely depend on striking a balance between affordable housing requirements and the benefits being offered.

MS presented findings on viability, comparing using two models: one their own model and the other employing the council's, with the latter showing most favourable outcomes. Two models were proposed for robustness, and both will be included in the application.

MS inquired about the designated point of contact going forward, this was recommended to be Charlotte Greves (Planning Officer).

SK highlighted the advantages for the school within the plan, including amenities such as parking facilities and an all-weather pitch as part of the initial proposal.

RG set out the requirement for a twin-track approach, proposing that SK, as the developer, consider prioritising planning first, and separately, the solution to meet the educational need. Suggesting that the planning team, as the local planning authority, will continue to work alongside education colleagues but will step away from any discission related to land ownership. Sara Griffiths is identified as the contact person for educational matters.

SK notes that he had plans to conduct a public consultation and expressed readiness to proceed with the application. He emphasized his intention to keeping everyone, including the community, fully informed on the process.

HT recommended submitting an outline application reflecting the proposed extension of Section 106 agreements across the entire site, avoiding the need for delegation to specific areas outlined in red lines and superseding existing agreements.

MS raises the prospect of another parcel of land, Pludds Meadow, comprising of 24 units, two of which are affordable. MS notes that to enhance viability there is a desire to lose those 2 affordable units along with the others. It would be a separate site and a separate section 106.

RG set out the LPA position on affordable housing and the implications in seeking a deviation from existing policy.

Appendix 4

Primary School Places Data (2022)

LA No: 669

LA Name: Carmarthenshire

Actual NOR at 14 Jan 2022 Type of School: NOR in Surplus capacity Significant surplus calc School MCSW Canacity MCSW Canacity CSW Canaci Over Pupils in SEN School Name Welsh Indicator mmunity/ VC/VA/ Foundation Faith Indicator Age Range pupils & pupils in SEN Units) Sig Surplus Calc Over capacity Schools over subscribed AN for Sept AN 2 for Sept Reception in Jan of nursery pupils on rol Surplus % Special features (Fed or Mid) 2021 2022 Change subscribed % 3000 Abergwili WM Church in Wales 4 - 11 31.15 0.00 WM 2018 Bancffosfelen 2034 Bancyfelin 4 - 11 86 33 33 12 38.37 0.00 WM 19.64 0.00 2180 Beca WM 4 - 11 72 16 10 22.22 0.00 TR 3 - 11 104 43.27 0.00 EM 2374 Bigwn 3 - 11 174 36 25 36 17 14 0.00 WM 4 - 11 58.62 0.00 2392 Bro Bany DS 4 - 11 417 495 495 78 0 59 15.76 0.00 65 WM 0.00 2389 Bro Brynach 36.19 EM 3 - 11 216 3.24 0.00 3 - 11 12 2390 Bryn Teg 212 210 210 0 2 30 0.00 0.95 WM 3 - 11 0.00 13.16 4 - 11 60.68 0.00 2394 Burry Port Co. FM 3 - 11 210 28 13.33 0.00 EM 2121 Bynea 3 - 11 166 138 138 28 19 23 18 0.00 20.29 VV/VV 3 - 11 13 13.54 0.00 2386 Carreg Hirfaer WM 4 - 11 146 160 160 14 8.75 0.00 WM 4 - 11 ederation with Gwynfryn and Ponthenri - 08.10.12 - F0017 2000 Cefneithin WM 4 - 11 88 85 85 0 3 12 0.00 3.53 WM 3 - 11 138 9.42 0.00 13 Federation with Drefach - 08.10.12 - F0018 0 2067 Cwrt Henri WM 4 - 11 0.00 6.25 WM Federation with Llanpumsaint - 18.02.13 - F0016 2187 Cynwyl Elfed 83 83 25 11 30.12 0.00 FM 3 - 11 140 12.14 0.00 2001 Drefach 38.03 0.00 Federation with Cross Hands - 08.10.12 - F0018 WM Church in Wales 4 - 11 108 108 84 77 78 0.00 WM 2061 Ffairfach 4 - 11 90 12 1.11 0.00 Federation with Talley - 06.01.2020 56 WM 3 - 11 420 420 35 60 8.33 0.00 WM 2128 Five Roads 4 - 11 90 90 105 15 14.29 0.00 WM 4 - 11 63 32.31 2384 Griffith Jones DS 3 - 11 278 295 295 17 0 42 42 5.76 0.00 WM 3 - 11 123 2019 Gwynfryn WM 4 - 11 33 38.82 0.00 Federation with Carwe and Ponthenri - 08.10.12 - F0017 WM 2168 Gymraeg Brynsierfe 210 41 30 19.52 0.00 WM 3 - 11 369 365 0.00 1 10 WM 2179 Gymraeg Rhydamar 268 210 0.00 4.69 256 46 0 12 36 24 WM 4 - 11 76 32 42.11 0.00 EM 2188 Halfway 2131 Hendy 3 - 11 210 13 30 6.19 0.00 DS 4 - 11 174 29 0.00 3.45 EM 2114 Johnstown 3 - 11 406 420 420 14 60 3.33 0.00 3003 Laugharne EW Church in Wales 4 - 11 29.81 3004 Llanddarog WM Church in Wales 4 - 11 83 83 0 11 8.43 0.00 FM 3 - 11 0.93 2181 Llandybie TR 200 200 28 24 1.50 0.00 EW 25.64 0.00 2057 Llanedi 39 10 WM 4 - 11 104 28 26.67 0.00 WM 38.89 2009 Llangain 54 0.00 54 21 0 DS 3 - 11 268 265 291 23 41 54 7.90 0.00 WM EM Church in Wales 4 - 11 3026 Llanllwni 42 6 16.67 0.00 2119 Llanmiloe 4 - 11 0.00 18.64 WM 4 - 11 2167 Llannon 93 93 8 13 8.60 0.00 WM 4 - 11 22 48.89 0.00 ederation with Cynwyl Elfed - 18.02.13 - F0016 2166 Llansteffan WM 4 - 11 56 27 0 8 48.21 0.00 VV/VV 4 - 11 WM Federation with Tymbl - 02.11.15 - F0022 2003 Llechyfedach 129 129 20 15.50 0.00 2098 Llys Hywel DS EM 4 - 11 140 3 2.14 0.00 20 3 - 11 30 14 29 0.00 2037 Meidrim WM 37.50 0.00 18 30 48 3322 Model EM VA Church in Wales 3 - 11 365 425 425 60 60 60 0 14.12 0.00 2112 Mynyddygarreg 2171 Myrddin WM 49 14 0 28.57 0.00 3 - 11 110 24 21.82 0.00 WM 2194 Nantgaredig 3 - 11 158 202 202 44 28 21.78 0.00 EM 4 - 11 210 315 61 Parc y Tywyn 3 - 11 102 32.38 0.00 DS 194 0.00 0.52 EM 2178 Pembrey 3 - 11 216 216 23 0 30 10.65 0.00 2395 Pen Rhos DS WM 420 4.05 0.00 Church in Wales 4 - 11 10.11 0.00 2014 Peniel WM 105 105 0.00 6.67 3321 Pentip 2190 Penygaer 2193 Penygroes 2024 Ponthenri EM VA Church in Wales 4 - 11 107 193 193 86 86 0 27 44.56 0.00 14.49 207 30 29 0.00 WM 4 - 11 163 0.00 1.23 WM 4 - 11 64 72 8 0 10 0.00 Federation with Carwe and Gwynfryn -08.10.12 - F0017 56.58 7.50 0.00 WM 4 - 11 43 WM 240 3 - 11 4 - 11 2189 Pwll EM 50 50.51 0.00 23 2084 Rhys Prichard 210 14 0 30 6.67 0.00 FM 3 - 11 20 WM 4 - 11 210 15 0.00 7.14 3301 St Mary's, Carr EW 3 - 11 62.50 Catholic 54 144 144 90 90 0.00 3300 St Mary's, Llanell EM VA Catholic 3 - 11 163 185 185 22 26 11.89 0.00 285 285 28 40 9.82 0.00 2375 Stebonheath 2176 Swiss Valley EW 4 - 11 0.00 3.29 WM 18 29.03 0.00 ederation with Ffairfach - 06.01.2020 62 2183 Teilo Sant 2175 Trimsaran 24.76 12.86 0.00 WM 3 - 11 158 183 210 210 52 27 18 WM 2044 Tycroes 2006 Tymbl EM 4 - 11 4 - 11 181 18 0.00 1.66 Federation with Llechyfedach - 02.11.15 - F0022 174 174 47 47 0 24 27.01 0.00 2388 Y Bedo WM 112 30.11 0.00 3 - 11 214 265 62 23.40 0.00 WM 3 - 11 0.00 7.26 340 0 23 45 2379 Y Ddwylan 4 - 11 326 300 -26 38 42 12.67 0.00 3.33 0.00 2385 Y Fro WM 4 - 11 22 336 36 36 420 14 38.89 0.00 43 2396 Llangenne WM 3 - 11 420 84 0 60 20.00 0 63 0.00

LA No: 669 LA Name: Carmarthenshire 1 2 Actual NOR at 14 Jan 2022 (exclude nursery

Nur	mber	School Name	Welsh Indicator	Community/ VC/VA/ Foundation	Faith Indicator		pupils & pupils in SEN Units)	2021	2022	Change	capacity	surplus calc	Sig Surplus Calc	Over capacity	Schools over- subscribed	AN for Sept	AN 2 for Sept	Reception in Jan	exceeded	of nursery pupils on roll	Surplus %	subscribed %	classes	Special features (Fed or Mid)
	94	= Total number of schools					13,732	15,829	16,040	211	2,465	1,127	656	157	17	2,258		1,883	56	1,800			193	
				Counts			40					19	13	16	3									
												-	3		5	-					36			
	1 5	Small school count (schools with fe	ewer than 90 pupils)			TOTAL	13,732		16,040							2,258		1,883		1,800			193	
	2 (Count of schools with significant su	urplus (more than 30) surplus places and gre	eater than 25% capacity)	PLASC TOTAL	L 13,732		16,040							2,258		1,883		1,800			193	
	3 (Count of small schools with signific	cant surplus			Control Total	0		0							0		0		0			0	
	4 (Count of schools which are oversub	bscribed																					
	5 (Count of small schools which are o	wersubscribed																					

Appendix 5

The Carmarthenshire Pitch Sports Facilities and Clubs Vision Plan (April 2024)

CONTENTS

I: INTRODUCTION	2
II: BACKGROUND	3
III: EXECUTIVE SUMMARY	4
IV: STRATEGIC ALIGNMENT	8
V: SUPPORTING THE VISIONS FOR SPORTS	14
VI: ABOUT THE SPORTS	22
VII: CLUB AND FACILITIES DATA	25
VIII: FUTURE FACILITY CONSIDERATIONS	38
IX: RECOMMENDED IMPLEMENTATION PLAN	46
X: ANNEXES	48
ANNEX A: FOOTBALL FOUNDATION MICROPLASTICS UPDATE JANUARY 2023	49
ANNEX B: COMMUNITY CLUB HOUSE/CHANGING GUIDANCE	51
ANNEX C: PITCHES AND CLUB DATA	57
ANNEX D: FOOTBALL PITCH DIMENSIONS AND WORLD RUGBY STANDARDS	59
ANNEX E: INDICATIVE DISTRIBUTION OF CLUBS, IN CATCHMENT CLUSTERS (30 IDRIVE TIME), FORMING RECOMMENDED AGP HUBS	

I: INTRODUCTION

- 1. This is a 'pitch sports' facilities vision and plan to provide Carmarthenshire County Council with a clear picture of future supply and demand. It creates an evidence base and set of recommendations for future pitch sports needs and the required landscape to both inspire and accommodate the needs of the sports across the Local Authority area. It is designed to inform future decisions in respect of facilities and related sports and club development, as well as facility finance and management models.
- 2. It provides an analysis of facility needs which is:
 - a. Relevant to meet today's and future needs.
 - b. With a clear rationale aligned to recognised priority outcomes.
 - c. Aspirational but deliverable, 'affordable' and financially sustainable.
- 3. However, facilities alone, are not a means to an end, and it is important the rationale driving provision and investment is measured against development end games. In this respect the Carmarthenshire Actif vision, as well as relevant Corporate priorities, are to:
 - a. Improve wellbeing through inspiring our population to be Actif for Life providing improved access to active and healthy lives for all children and young people, improving health and wellbeing into adult hold through being more physically active.
 - b. **Support the development of better communities -** places to live, work and visit through stronger community-serving sport and leisure organisations and more attractive, effective and sustainable facilities.
 - c. **Develop and grow the workforce** doubling the number of volunteers.
 - d. Create 'Sustainable Communities for Learning' facilities that can inspire and engage students as well as the wider community to be physically active, helping tackle educational inequality, achieve higher standards and aspirations, so all children and young people are best prepared for their future lives.
- 4. The plan takes account of all facilities and providers not just those maintained by the County Council, but Schools, College and University, Town/Community Councils and Club managed sites. Future solutions should be designed to maximise the use and impact of all appropriate facilities.
- 5. The plan is also intended to assist the Council and its stakeholders, including sport's governing bodies and clubs, make decisions and work together better to achieve an improved local facilities landscape and levels of activity across the County, for all people at all levels of ability. It should provide context and supporting information for all groups and purposes.

II: BACKGROUND

- 1. In February 2023, Carmarthenshire County Council's Sport and Leisure Services commissioned Just Solutions Consultants to help shape a future strategic vision and approach to the provision, management, and maintenance of outdoor sports pitches, particularly Artificial Grass Pitches (AGPs).
- 2. The pitches review informing a future vision, is in response to:
 - a. The 2023-33 draft Leisure Culture and Outdoor Recreation Strategy commitment to a sports pitch strategy with the aim of every school having an AGP.
 - b. The need to inform the case for future investment in pitches natural and artificial turf
 particularly in response to external grant sources.
 - c. The need to maximise the availability of Welsh Government Community Focused and Sustainable Learning Communities capital funding.
 - d. The need for a considered long-term management and capital investment strategy that reflects the considerable, and escalating initial capital, replacement, and ongoing running costs of AGPs.

3. This report:

- a. Focuses on AGP provision alongside the need for improved grass pitches a complementary approach to best service all community sport as well as educational needs.
- b. Reflects on the importance of necessary off-pitch support facilities changing rooms, learning and social spaces and ensuring all future facilities are accessible, more attractive and welcoming to all.
- c. Considers effective future operating and management models to maximise impact and investment and secure long-term sustainability.
- 4. The work undertaken to inform the draft vision has included a mix of:
 - a. Desk review of strategies, sporting, and facility data.
 - b. Site visits.
 - c. Consultations.

III: EXECUTIVE SUMMARY

Summary Headline Facts and Messages

- Current and Future Artificial Grass Pitches (AGPs) in Carmarthenshire
 - o 6 Full Sized 3G AGPs.
 - o 4 Full Sized Short Pile AGPs (a County-wide need for no more than 3).
 - At least 9 Small Sized AGPs.
 - A further 4 planned Full Sized 3G AGPs.
 - A potential need for 7 additional 3G AGPs
 - The above growth in AGPs are expected to deliver a 27% target growth in players and teams, particularly women and girls.
- Significant Cost Implications
 - o The additional estimated capital costs for new AGPs amount to over £10m.
 - o In total, accumulating an estimated Ten-Year replacement capital liability of £10m.
- As well as AGPs, there are over 160 grass football and rugby pitches in the County.
- These facilities are essential to serve the biggest sports/club and membership numbers with the biggest demand for growth in Football and for Women and Girls.
 - o Currently, there are over 75 football and rugby clubs with over 11.5k members.
 - 3 hockey clubs with 250-350 members.

The review of artificial and natural grass pitches in Carmarthenshire identifies a potential need for an additional eleven Full-Sized 3G AGPs. This assessment is based on both current, and identified latent demand, current Football and Rugby club numbers and teams supported by the recognised potential for growth in participation impact that the surfaces deliver, particularly for woman and girls.

However, this demand must be set in context with the significant, and rapidly escalating capital and running costs of AGPS. The required capital investment demands a significant commitment from the lead organisation, including the Council, alongside a recognition of the following Five Big Challenges, that need to be addressed:

- Environmental sustainability challenges and global plans for change in future pitch designs.
- The need for significantly more work on local feasibility studies and business plans, to inform the size, 'best' surface, usage and management plans to maximise impact.
- An even greater step change in the design of Community Focused Schools attractive outdoor sports designs, driven by community need that also serves Curriculum delivery.
- The establishment of locally managed community hub models a consortium of clubs.
- The provision of attractive, welcoming and inclusive off-pitch facilities, on club sites, to facilitate
 growth and inclusivity, as well as student learning/community pavilions on school sites, to
 serve stronger community club hubs, and create a gateway for the community use of school
 facilities.

More capital investment is needed, but not without a commitment to address the identified challenges and the necessary preparatory work described above.

Summary Introduction

- 1. Generally, across Local Authorities, the historical focus has been on investment in built leisure facilities with a particular business case driven by the growth in the health and fitness market and need for aquatics provision alongside sports halls for indoor activities. There has been less emphasis on the facilities necessary for development, training, and competition for outdoor pitch sports particularly grass pitches and support accommodation. These facilities are essential to serve the biggest organised team sports, displaying the largest demand and scale of facility challenges alongside a need for more opportunities for women and girls.
- 2. However, a growth in demand for AGPs, particularly since the introduction of 3rd Generation (3G) long pile, plastic carpets with a rubber infill, suitable for all forms of football and rugby, has led to an escalation in their provision, with all secondary schools, and many clubs even, aspiring to have their own artificial pitch. Currently, this is with little consideration given to the significant capital and running costs; maintenance and management requirements; and most important effective shared community club hub usage and management plans to maximise their impact and worth.
- 3. This plan sets out the strategic rationale, sporting and facility evidence and a range of considerations and recommendations for the future provision of sports pitches and support accommodation for outdoor team sports. It includes a particular focus on football, recognising the scale of need and demand alongside a response to the FAW launch of the Cymru Football Foundation, as well as investment available through Sport Wales' 'Collaboration' funding for artificial pitches.

Summary Emerging Themes

A Need for a Vision for Fit for the Future Outdoor Sports Pitches for Clubs and Schools

- 4. There is a need for better quality grass pitches alongside welcoming fit for purpose pavilions (changing and club rooms) appropriate to serve female as well as male team sport needs.
- 5. Despite the recent focus on AGPs and particularly '3G' pitches, these form only a small part of the facility solution. Clubs with better grass pitches, as well as off-pitch support facilities, are an essential requirement for the sports to grow. The vision for the future should include the Local Authority working with National Governing Bodies to help clubs prepare their own business growth plans and access funding.
- 6. It is recommended that the Local Authority adopts a vision for fit for the future and different purpose outdoor sports spaces, as part of a wider vision for open space. This should also inform priorities for development support that particularly ensure:

- a. Club facilities on and off pitch, are supported to **enable clubs to play a key role in the heart of their locality,** to grow, become robust and sustainable community enterprises and increase their impact across their catchment area.
- b. There are **sufficient strategic grounds across the County** that meet league requirements to support clubs playing at all levels of competition.
- c. Facilities are improved to ensure they are attractive and accessible to females supporting the growth in women's and girls' sport with appropriate grass and 3G hubs also identified as priorities for female sport.
- 7. Whilst the County Council is not directly responsible for the provision of club facilities, the vision and plan should include investment priorities and targets to support the case for attracting external funding into all facilities across the County.

A Priority for Future Investment is to Support Inspirational Visions for Schools and their Communities

- 8. New look visions for the efficient and effective design of outdoor spaces on school sites should be designed to create a much wider and more innovative use of different activity areas, with greater variety supporting delivery of the Curriculum for Wales, student engagement and learning, as well as community club use.
- 9. 'New look' school sites can deliver both educational and wider community benefits making the facility work for all. Such fit for the future facilities model for schools should include:
 - d. Innovative layouts maximising outdoor spaces with as many engaging teaching areas for different types of sport/activity.
 - e. Off-pitch community club hub/student wellbeing and study centres opening up community club access to their use of sports pitches providing for a dual purpose:
 - i. A space for pupils to study think and relax.
 - ii. An environment where sports clubs can thrive.
- 10. The delivery of this vision will depend on the establishment of a shared Education and Leisure plan, with an agreed rationale informing any prioritisation, fund raising and investment criteria.

<u>Very High Levels of Investment Needed for Artificial Grass Pitches Demanding Additional Considerations be Addressed Before Proceeding</u>

11. In respect of outdoor sports facilities most of the focus in recent years has been on the provision of artificial grass pitches – initially short pile/sand-based carpets providing a fast surface most suitable for hockey. More recently 3G (3rd Generation) longer pile and until now, rubber crumb infilled carpets, of different lengths and construction are most suitable for football

and rugby (longer pile with shockpad).

- 12. However, AGP provision needs careful consideration in respect of ongoing costs, their use, access, pricing, management, and environmental impact. Importantly, the design size and specification, should be informed by a community business case with a robust purpose and community usage plan. Agreement to invest and build must follow the preparation of this business plan.
- 13. These facilities demand a significant capital investment in their construction i.e. c£1m including fencing and floodlighting (c£350k-£500k for the conversion and upgrade of an existing all-weather area). Within a 10-year cycle (depending on use and maintenance) regular replacement carpets must be planned at a cost of c£350k (today's prices) and form part of an annual running cost in the region of £50k. The current estimated 10 year replacement cost liability for all the current and planned AGPS in Carmarthenshire is in the region of £10m equating to an annual sinking fund cost of nearly £1m.
- 14. Given strategic significance and cost, the recommended model for AGPs is for provision on strategic education sites, developed in partnership with a coordinated club hub. This is a consortium of the catchment clubs forming 'management steering group' to ensure the facility is best used by all clubs for training and to inform usage programmes, priorities and shared development activities as well as providing for at least junior league fixtures (depending on size). Typically, a 3G hub is made up of federation of four to five football and rugby clubs. On this basis the vision for Carmarthenshire should include provision of c17 3G hubs to serve clusters of football and rugby clubs. Three short pile AGPs are needed to support a Hockey Club Hub in each area of the County (East, West, South).
- 15. Into the future, except in special cases, because of the usage challenges experienced with managing track activities around the playing of team ball sports and maximising the impact of investment, AGPs are not recommended for future developments within athletics or cycling tracks.
- 16. It should also be noted that 'full-sized' AGPs do not need to be sized to meet senior, top tier, competitive requirements, unless the AGP is to serve as a stadium pitch with all the ancillary facilities that meet league licensing standards.
- 17. Finally, future plans also need to recognise changing technology and the environmentally negative positive impacts of artificial / plastic pitches with the current rubber crumb infill alongside the positive environmental impact of natural turf, biodiverse, outdoor green spaces.

IV: STRATEGIC ALIGNMENT

- 1. For this plan to be recognised as being of strategic importance, the priorities must also be aligned to, and help deliver, Welsh Government/Sport Wales and Carmarthenshire County Council's Corporate and Local Development Plans, as well as Governing Body of Sport national visions. The key messages that are considered relevant to this plan are set out below.
- 2. For the future management of sports facilities on school sites and particularly in the context of this report and the future provision and operation of AGPs, it is particularly important to translate the Sustainable Communities for Learning and Community Focused Schools' policies into actual good practice and local heads of terms.

Welsh Government Programme for Government and Wellbeing Priorities

- 3. The plan evidences how investment in pitch sports activities and facilities will deliver a significant impact in a number of areas i.e.
 - a. Contributing to improved health and wellbeing whilst at the same time celebrating diversity and moving to eliminate inequality, i.e. the provision of:
 - i. More attractive and accessible outdoor sports facilities serving the biggest and most in-demand sports, essential to engage more children and young people, but to also support community cohesion through clubs as well as lifelong participation and a better offer that is more available and attractive to all, particularly females.
 - ii. Facilities and work with catchment clubs prioritising deprived communities and addressing health inequalities.
 - iii. Facilities and support for clubs used as a vehicle for helping promote the Welsh Language, supporting the target of a million Welsh speakers.
 - b. Ensuring that **local communities are centres for sport and culture and vibrant places to live, work and play** with quality facilities that are accessible to all. Parks pitches can **help achieve the Government target of 20-minute communities.**
 - c. Promoting equal access to sports and support for young and talented athletes as well as grassroots clubs:
 - i. The plan is designed to support communities and grassroots clubs, children and young people activity in schools as well as identify higher profile clubs and facilities where talent can be developed and success secured, instilling a feeling of local pride.
 - d. The Government manifesto identified the aspiration to invest in world class sports facilities including new facilities such as '3G' pitches, whilst wanting to help tackle the climate and nature emergency and achieve net zero carbon by 2030:
 - i. This plan promotes a responsible programme of investment in AGPS, principally 3G, to ensure accessible and affordable provision is developed across the County and that these facilities are well used by the clubs and groups in the local catchment.

- ii. 3G pitches should be well managed and maintained in a sustainable way they are expensive to construct, maintain and regularly replace and environmental issues must also be at the forefront of everyone's minds. Plastic pitches cannot be easily disposed of and the current rubber crumb microplastics also cause environmental concerns.
- iii. AGPs should be developed alongside a programme of investment in improved grass pitches which are more sustainable long term and remain the main facility for playing sport.
- 4. The big participation pitch sports (particularly football and rugby because of their scale and community reach) can make a significant contribution to the Wellbeing of Future Generations' goals i.e.
 - a. A prosperous Wales helping develop skills, future leaders and a healthy workforce.
 - b. A healthier Wales football and rugby in Carmarthenshire provide the most in demand activities.
 - c. A more equal Wales sports leading the way in promoting diversity and equality i.e. through high profile, race awareness campaigns, specific disability programmes, women and girls' initiatives.
 - d. Cohesive communities football and rugby clubs are at the very heart of communities across Carmarthenshire and with over 75 clubs, make up the largest sports clubs' sector in the County.
 - e. A vibrant culture- successful sports showcase the local heritage with their high-profile local teams inspiring future champions and supporters.

Welsh Government Vision for Sustainable Communities for Learning and Community Focused Schools

- 5. The Sustainable Communities for Learning capital investment is designed to create better facilities that can be used by learners and the wider community. This includes access to adult learning and sports and leisure activities.
- 6. However, the Programme for Government Update (2021), further commits Welsh Government to 'Invest in the learning environment of Community Focused Schools, colocating key services, and securing stronger engagement with parents and carers outside traditional hours.'
- 7. Welsh Government wants all schools in Wales to be Community Focused Schools to tackle educational inequality and achieve high standards and aspirations for all:
 - a. Building a strong partnership with families.
 - b. Responding to the needs of their community.
 - c. Collaborating effectively with other services.
- 8. It recognises that by working collaboratively across school, home and the community we can support our children and young people more effectively therefore, it aspires to a community

focused school approach that helps children and young people, families and communities.

- 9. For schools, community engagement is described in Welsh Government guidance as:
 - a. Acting as a key part of the local community, offering opportunities to use the school facilities for adult learning, well-being, play, sporting, cultural and other community activities.
 - b. Signposting to other support or advice services.
 - c. Utilising the skills and organisations within the community to extend and enrich learning opportunities and to positively influence change.
 - d. Promoting diversity equity and inclusion.
- 10. Welsh Government describes schools as a **key part of the local community by developing partnerships and engagement with community organisations and by best utilising their assets, they can become an important focal point for the community**. Partnership working brings benefits to the school, children and young people and their families. It also has positive benefits for the community, helping to create thriving, empowered and connected communities.
- 11. There are a number of benefits sought for schools in developing wider community partnerships with local community groups as well as public and private sector organisations. They can:
 - a. Strengthen the school's family engagement work.
 - b. Strengthen the school, bringing in resources and enriching the Curriculum.
 - c. Enable schools to make a positive contribution to community life, developing community cohesion and social capital.
 - d. Provide greater opportunities for adult learning, allowing community members to learn new skills and develop their confidence.
 - e. Enable wider community use of the school's assets, for example, sporting and social facilities, or the school grounds, which can enhance the health and well-being of the local community.
 - f. Increase the use of wider community support services, for example, citizen's and careers advice, etc.
 - g. Enable collaboration with community group leaders for joint community projects.
 - h. Allow schools to draw upon the specialist knowledge, skills and resources within the community to support the educational, social, health and well-being needs of children and young people.
 - i. Help schools encourage re-engagement with learners through links with wider community and third-party providers, for example, play providers, to support additional enrichment opportunities.

Healthy Weight: Healthy Wales

12. Healthy Weight: Healthy Wales is a ten-year plan to prevent and reduce obesity in Wales. Accompanying the Strategy are 5, two-yearly delivery plans, the second of which was published in March 2022 and has a focus on the early years, children, and adolescents, as well as tackling health inequalities for all. Over 1 in 4 children start school overweight or obese and this increases into adolescents and increases to over 60% by adulthood.

Carmarthenshire County Overview

- 13. Carmarthenshire supports a population of over 190,000 and is the fourth largest Local Authority in Wales.
- 14. The principal towns in the county include: Ammanford, Burry Port, Carmarthen, Kidwelly, Llanelli, Llandeilo, Newcastle Emlyn, Llandovery, St Clears, and Whitland. Furthermore, there are 72 Town and Community Councils with 134 community wards. Although Llanelli is by far the largest town in the county, the county town remains Carmarthen, mainly due to its central location.
- 15. Carmarthenshire is home to many big sports clubs playing at different competitive levels with the highest performing in rugby and football being the Scarlets professional, regional rugby team, playing at Parc y Scarlets, Llanelli Town AFC playing at Stebonheath Stadium and Carmarthen Town AFC, playing at Richmond Park Stadium, both in the Cymru South, Tier Two of the FAW pyramid.
- 16. Carmarthenshire County Council's vision is summed up in its current strategy as: 'Life is for living, let's start, live and age well in a healthy safe and prosperous environment'.

 Throughout the strategy recurring priority themes focus on:
 - a. Helping communities thrive ... enabling healthier lives.
 - b. **Health and wellbeing** ... enhancing our culture and identity including **sporting** pride.
- 17. The Council's cross cutting themes include: delivering health and wellbeing for all, for life; making Carmarthenshire a better place to live; supporting communities to be cohesive and resilient; caring for environment; the Welsh language; equality diversity and inclusivity at the heart of all.
- 18. Key drivers for the Council include addressing the challenge of **childhood obesity** (males aged 2-15 at greatest risk); tacking **poverty**; people living **healthy lives** correcting a **below Welsh average life expectancy**; **community** cohesion; supporting **older people to age well** with dignity; looking after **the environment** today, for tomorrow.
- 19. These themes are further reinforced in the County Public Service Board Wellbeing Plan 2023-2028 A 'Carmarthenshire We Want' i.e. the priority themes:
 - a. Stronger partnerships with communities.
 - b. Improving wellbeing and reducing health inequalities poverty.
 - c. **Safe and diverse communities** and places youth engagement.
 - d. Supporting communities to develop and maintain community owned or community led assets along with strengthened links between the voluntary sector and town and community councils, developing volunteering and the use of the Welsh Language.

- 20. Aligned to the strategic themes and priorities, the rationale for this Pitch Vision and Plan is to support stronger community sports clubs, playing in a key role in contributing to all of the above objectives, enhancing cohesive communities and providing lifelong healthy activity from young children to seniors, who can continue to be engaged in volunteering and the 'walking' and no contact versions of sport into later life.
- 21. To maximise this impact, the Pitch Plan needs to also recognise that the most popular, accessible and in demand sports, will deliver the biggest impact on the above strategic priorities.

The Revised Local Development Plan 2018-203 and Open Space Assessment 2020

- 22. The Local Development Plan (LDP) also sets out strategic objectives 'to promote health and wellbeing through the provision of development including community facilities, leisure and outdoor recreational opportunities, accessible to all.'
- 23. It emphasises the importance of sustainable development proposals helping:
 - a. Contribute to the regeneration of existing communities.
 - b. Reduce the reliance on the private cars and encouraging the use of more sustainable modes of transport.
 - c. Conserve and enhance the natural and built environment.
 - d. Promote the efficient use of land.
 - e. Maximise the efficient use of existing community infrastructure.
- 24. The LDP also recognises various challenges in the standards for outdoor sport and provision for children and young people including:
 - a. Facilities to be of sufficient size to enable effective use.
 - Accessible locations and quality facilities to maintain longevity and encourage continued use.
 - c. That the provision of outdoor sports facilities is not consistent across the County with some wards far exceeding the 1.6Ha per 1k people but others (20 in total) deficient
 - d. The areas with the highest provision i.e. over 5.5Ha per 1k population: Llandovery, Ammanford, Llandeilo, Whitland, Carmarthen South and Cenarth.
 - e. That only 6 settlements are entirely within 300m walking distance to outdoor sports provision and 83 settlements have no access to an outdoor sports facility within 300m.
- 25. This Pitch Sports Vision and Plan is an important mechanism for helping deliver the above planning policy objectives for outdoor spaces and their contribution to health and wellbeing.
- 26. New community artificial and natural turf activity spaces in response to major housing developments should be considered through planning gain along with sport-led community benefit agreements that encourage the development of attractive doorstep/community

solutions.

27. Key strategic development sites that could deliver significant potential opportunities should be identified with a vision and plan for the catchment clubs in each of those areas along with the facilities needed to deliver the vision. Achieving the best end result that serves all parties, should not be left to chance – an informed plan and proactive approach is necessary.

Recommendations for Action - Planning Policy

- 1. Prepare a vision with Planning Policy for fit for the future and different purpose outdoor sports spaces, as part of a wider vision for open space.
- 2. Apply the LDP policies and recommendations to the future playing pitch plan priorities.

The Actif Sport and Leisure Strategy

- 28. The Council's overarching Leisure, Culture and Outdoor Recreation Strategy (2023-2033), introduces several challenges for future attention with a vision for the future which includes:
 - a. More integrated services co-locations and collaboration.
 - b. Access to active and healthy lives for all children and young people.
 - c. Better communities places to live work and visit.
 - d. Developing and growing the workforce.
 - e. Maximising and attracting external and additional investment.
 - f. Net zero carbon by 2030.
- 29. Underpinning the overarching strategy, Actif Sport and Leisure sets out to:
 - a. Improve wellbeing through inspiring our population to be Actif for Life.
 - b. Work with education to focus on healthy active lives and reducing obesity by 50%.
 - c. **Manage well** (high quality and fit for the future facilities) and **connect well** (partnerships and integrated approaches) including:
 - i. Actif facilities recognised as integrated community hubs.
 - ii. Produce and deliver a sports pitch strategy with the aim of every school having an AGP.
 - iii. Secure major capital investment to make facilities fit for the future.
 - d. Double service users.
 - e. Double the numbers of volunteers.
 - f. Adopt a sport for all approach **supporting community sports clubs to become self- sustaining** with development support and a club toolkit– aligned to county sports plans and club accreditation.

V: SUPPORTING THE VISIONS FOR SPORTS

Sport Specific Facility Visions and Plans for Carmarthenshire

- 1. Each sport has a vision which should be applied to inform the facilities rationale, case and priorities for the sport in Carmarthenshire. This document already provides the supporting information and sets out:
 - a. The state of play current club and membership numbers.
 - b. Biggest challenges and facility challenges for the sport.
 - c. The priority outcomes what the sport wants to achieve.
 - d. Facility priorities needed to achieve the outcomes and address the challenges.

<u>The Football Vision - Ensuring everyone has access to quality, inclusive and sustainable facilities</u>

- 2. **Poor facilities are the number 1 issue affecting people playing the game,** with the need for better facilities recently highlighted through the FAW's Grassroots Survey i.e.:
 - a. Only 21% rating pitches as good. There is a need for more and better-quality grass pitches which meet the '80% a good standard desired for community football' (GMA programme) allowing for increased use, more female football and reduced cancellations.
 - b. **Only 23% rating changing rooms as good.** Inappropriate changing rooms and toilets were reported as a widespread issue for women and young people i.e. 'girls sharing with boys' or 'having to change in a car'.
- 3. The FAW's Inspirational and Fit for the Future Facility Goals are:
 - a. **Participation growth** quality facilities meeting wider community needs and tackling inequalities.
 - b. **Environments for Her** inspiring and welcoming facilities to support the growth in numbers of female players.
 - c. Stronger, sustainable, community focused clubs with own home facilities and access to Artificial Grass Pitch hubs or training areas.
 - d. Strategic clubs competing in the top tiers of the domestic pyramid, raising standards in both the men's and women's game, attracting more support and promoting a higher profile domestic game as well as playing a greater role impacting on their wider community and supporting local clubs.
 - e. More environmentally friendly and financially sustainable facilities.
- 4. These goals are intended to:
 - a. Improve playing, volunteer and spectator experiences.
 - b. Enhance physical and mental wellbeing through the development of stronger community focused clubs.
 - c. Create more attractive, effective, and sustainable community amenities.

5. The FAW Facility Visions

a. Community Club Homes

i. All clubs to have access to: Their own club facilities to establish a strong base and focus within their community. To include a home ground and club house, and where appropriate, access to satellite pitches and pavilions, for multiple junior, senior, male and female teams.

b. Community Club Hubs

- i. All clubs to have access to:
 - 1. Artificial Grass Pitch (AGP) Hubs based at strategic AGPs providing shared club training, female focused and league central venues.
 - **a.** A target of **community club hubs** at strategic Secondary School Sites shared used artificial grass (3G) pitches led by federations of an average of 4-5 catchment clubs in partnership with the local league.
 - **b.** Creating:
 - i. Shared club training and league fixture hubs underpinned by a hub management group responsible for maximising use by priority groups/clubs; catchment club use on designated club training nights; central venue fixture programmes; wide ranging recreational programmes; coach or referee development.
 - ii. Female focused AGP hubs where current barriers to regular participation are removed and the offer includes attractive introductions to the sport feeding into complete pathways to performance and overseen by female game led management groups.
 - 2. Strategic Grass Pitch Hubs developed as designated domestic grounds, female focused venues or multi grass pitch sites serving as central league venues to include:
 - **a.** Multi pitch park sites developed and improved as shared club satellite, female hub or dedicated league central venue hubs.
 - b. Strategic grounds, spread across the Local Authority, enough to meet different FAW Tier 1-3 Licence criteria, shared by promoted clubs in the area as needed enabling club progression. With the necessary facilities to support and promote a higher domestic game standard and profile.

c. More Female Friendly Facilities - working for everyone

- i. Helping to double female membership creating 100% equal access for women and girls.
- ii. Developing female-focused 3G AGP hubs, where current barriers to regular participation are removed.

iii. Transforming pavilions to create more welcoming facilities, with positive imagery, social areas and community wellbeing spaces, separate changing for female referees, and appropriate toilet provision.

d. Strategic Stadia

- i. The FAW Vision states 'where appropriate, we aim to see multi-pitch sites, or senior domestic grounds, acting as central league venues at priority, strategic locations to include:
 - a. Multi-pitch sites, often found in large and urban communities, developed and improved as central league venue hubs.
 - b. Strategic grounds, that meet different FAW Licence criteria, evenly distributed across each Local Authority area, that can be shared by promoted clubs and provide the necessary facilities to support and promote a higher domestic game standard and profile.
- ii. Ground sharing is encouraged as a model for efficient and effective stadia developments which have expensive infrastructure requirements.
- iii. The preferred approach is a natural turf grass pitch and artificial (3G) training pitch where maximum use can be assured and the pitch is likely to last longer before replacement, as it does not need to secure a FIFA Quality License every 3 years.
- iv. Where the home club or facility offers the potential to satisfy the needs of more than one senior club to enable progress through the upper levels of the competitive 'pyramid', then the following should be considered for both natural and artificial turf pitches:
 - The arrangements will not work where one of the clubs is promoted to or has the potential to be promoted to Tier 1, where they will be required to meet all league licensing and are likely to want full use of the pitch to service their player academy requirements resulting in limited capacity for more than one club's use.
 - 2. Consideration should be given to the merits of shared stadia, where clubs need to maintain Tier 2 or Tier 3 standards, and the arrangements to share a strategic stadium will deliver an economical approach to satisfy all requirements.

The Hockey Vision - Hockey Wales Strategy 'Igniting a Passion for Hockey'

6. Hockey Wales does not currently have a facilities strategy, but has recently prepared a new overarching strategy setting out 3 strategic pillars underpinning its goal of **delivering world** class hockey experiences for everyone, everywhere.

7. There are many facility challenges facing hockey and its clubs i.e.:

- a. Hockey is challenged to increase participation and recognises the need for multiple models, the use of different surfaces, more exciting and attractive easy and simple to play versions of the game.
- b. The sport needs to use facilities to support stronger club business models. Currently there are 63 clubs across Wales but with an average of only 2.5 teams per club and 70% of clubs registering less than 100 members (memberships range from 20 to the largest clubs in significant urban centres, such Whitchurch in Cardiff with over 550 members), club sustainability, and the business case for facilities and securing priority access is challenging.
- c. As well as traditional and established competition structures, Hockey Wales recognises the need to develop new and exciting products to increase participation and retention i.e. masters leagues, small sided competitions.
- d. Many clubs find it difficult to secure priority use, at peak times, with affordable rates.
- e. The lack of access to a 'club house', where members can gather post-training and matches, fails to create a sustainable, appealing social and revenue generating base.
- 8. To deliver the vision for the sport, different facilities models need to be considered for different purposes aligned to 3 strategy pillars i.e.:

a. Engagement Facilities

- i. Easy access local engagement facilities providing participation to deliver growth and inspiration. Small sided and fun forms of the game and facilities to create positive participation experiences in schools which can include use of small sided games areas and indoor halls.
- ii. These outreach engagement centres should be identified within the catchment of a strategic hockey hub with the clubs connected to the feeder engagement centres where the participation hockey for growth experiences are organised.
- iii. This level of the game does not need strategic specialist facilities but can include small sized AGPs currently over 150 across Wales (Short Pile or 3G) or Polymeric/hard-court Multi Use Games Areas (MUGAs); and/or access to an indoor hockey participation offer in sports halls found in secondary, and primary schools, community or leisure centre,.

b. Competition Facilities

- i. This level of the game needs to see the development of stronger, sustainable clubs with access to strategic, 'go to' facilities, suitable for club competition hockey. These are full-sized competitive, quality, Short Pile AGPs where hockey is the priority user.
- ii. Designated 'strategic club hubs' provide for club training and competition, and serve as a 'go to' attractive 'honey pot' for young and adult players, to develop

- their game and enjoy being a member of a club. These hockey hubs can support at least 2-3 clubs supporting 300 or more members and a hockey hub steering group should oversee the priority usage plan.
- iii. The facility use should be supported with a designated 'club house' which on education sites could be a multi-purpose learning and community centre, with relaxed seating, small kitchen, toilets and nearby, accessible changing rooms.

c. Performance Facilities

- i. At the National Centre there is a need for improved performance analysis technology and better facilities to service the needs of more spectators and different audiences.
- 9. **Environmental Sustainability** Hockey Wales is mindful that surface technology is always advancing, as well as which, future facilities will need to be more environmentally sustainable. No water-based pitches will be developed after the 2024 Paris Olympics and new 'dry turf' performance surfaces will be the focus for the future. This may also impact on the future vision for strategic performance development and competition hubs.

The Rugby Vision

- 10. The WRU does not currently have a facilities strategy but its club and community work is focused on developing a thriving and modern club network and with strategic targets which include increasing membership through stronger clubs by a further 10k to a total of 65k by 2026, and nearly doubling female membership currently at 12% of the total membership by a further 5.2k to a total of 11k.
- 11. It recognises that to ensure rugby continues to thrive throughout Wales, this starts with a vibrant club house i.e. welcoming places which offer multifunctional spaces for use by all sections of their surrounding communities.
- 12. To deliver its strategy, the WRU has initially developed an online and practical education and support programme Dysgu WRU. The implementation of this will undoubtedly be connected to future investment.
- 13. Dysgu WRU, focuses on 14 varied themes ranging from: equality diversity and inclusion; VAT; period and menopause positive clubhouses welcoming to women and girls; governance; health and safety; volunteers; to use of social media.
- 14. In terms of facilities, the WRU commissioned a 2022 review. The review consultation reported that facility improvements were highlighted as the most important topic to address over the next few years. Especially in rural areas and the North. 33% of those surveyed rated rugby facilities in the area as poor and very poor.
- 15. Survey respondents highlighted the important facility priorities and expressed a strong preference towards grass pitches as the priority surface with the priorities including: improving quality of grass pitches; club house improvements; floodlights; access to more grass pitches for training to protect match pitches.
- 16. Clubs would also like access to 3G for training as an additional option alongside grass. However, they were seen as most beneficial for use by the youngest age groups and for inclusion and disability offers, but are not seen as the 'go-to' surface for the majority of rugby participants throughout the pathway.
- 17. The cost of construction/maintenance and hire of 3Gs was seen as the main disadvantage and 30% of respondents also noted increased risk of injury.
- 18. Currently there are 52 World Rugby compliant pitches (See Guidance in **ANNEX D**) out of a total of over 130 full sized 3G pitches in Wales. However, the WRU is also very mindful of the upcoming ban on microplastic infill and unknown future in respect of World Rugby compliant standards to meet the H&S requirements for full competitive rugby.

- 19. Given the priorities identified above, the future 'Places' strategy is likely to be focused on specific priority areas.
 - a. **Sustainable clubs** welcoming club houses inclusive and particularly for women and girls, more and better-quality grass pitches, training facilities, floodlights, training pitches and creating an environmentally sustainable infrastructure.
 - b. **Target schools** providing on and off field best rugby contributing to player pathways.
 - c. Strategic 3Gs current priority areas
 - i. Carmarthenshire Llandovery.
 - ii. Torfaen Cwmbran.
 - iii. Powys Brecon.
 - iv. Neath Port Talbot.
 - v. North Wales.

Creating the Strategic Pitch Sports Facilities Priorities for Carmarthenshire

- 20. Going forward, Carmarthenshire County Council will need to build on its partnerships with the FAW, Cymru Football Foundation, WRU, Hockey Wales, Sport Wales, local stakeholders to:
 - a. Provide more opportunities for participation through the development of accessible, inclusive quality facilities, supporting facility models that serve wider community needs.
 - b. Support the long-term vision to develop collaborative club hubs, based at 3G pitches¹ located on all secondary school sites around the county.
 - c. Support the creation of stronger and more sustainable clubs by investing in facilities that improve training and competition opportunities, supporting active community partnerships and through effective club facility management and pitch maintenance models.
- 21. The implementation and further development of the facilities plan should be managed by a collaborative sports partnership made up of elected members and officers from the County Council and NGBs.
- 22. The partnership should oversee and monitor the implementation of the plan and sports pitch developments in the County advising on recommendations for action and investment when required.

Recommendations for Action – National Governing Body (NGB) Sports Partnerships and Priorities

- 1. Establish a NGB partnership forum to support the implementation plan assist with establishment of investment priorities.
- 2. Work in partnership with NGBs to prepare sports specific visions to inform the facilities priorities and actions.
- 3. Establish the priority sports and clubs based on evidence of need and impact.
- 4. Establish the facility priorities necessary to address challenges / achieve the desired impact i.e. priority club facilities and strategic grounds together with the infrastructure needed to satisfy the activity growth targets set for the sports, particularly facilities fit for females.
- 5. Work with NGBs to prioritise the clubs with the largest membership (juniors and females) and potential, together with the greatest facility needs, to ensure that future outcomes are achieved.

21

¹ A 3G pitch is one with a '3rd Generation' long pile artificial carpet. Because of the considerable construction and replacement costs, they are generally only viable on strategic/secondary school sites where there is day-time as well as evening and weekend use, and where running costs can be shared across budgets.

VI: ABOUT THE SPORTS

Sports Data Analysis of Greatest Need and Demand, Potential and Impact

- 1. In Wales, there are:
 - a. Nearly 900 Football clubs and over 100k registered Football players.
 - b. Over 270 Rugby clubs and over 59k registered Rugby players.
 - c. Over 63 Hockey clubs and 6k Hockey players.
- 2. The Sport Wales latest School Sport Survey (2022) results are set out in the table below (Fig.1.).

Sport Wales School Sport Survey (2022)	All Wales Results Rounded to .5%	Carmarthenshire Results Rounded to .5% N.B. Figures in bold are the sports 'behind' the national average								
Any participation in any setting										
Football	64.5%	63.5%								
Rugby	37%	45.5%								
Cricket	31%	34%								
Hockey	12%	15%								
Extracurricular participation										
Football	20%	18.5%								
Rugby	12%	15%								
Cricket	10%	10%								
Hockey	5%	6.5%								
Community club participation										
Football	30%	25%								
Rugby	12%	19%								
Cricket	6%	9%								
Hockey	2.5%	3%								
Latent demand										
Football	43%	37.5%								
Rugby	21.5%	23%								
Cricket	25%	20%								
Hockey	10.5%	7%								
Unmet Demand N.B. Biggest Unmet Demand (17.5%-21%): Archery; Motor Sports; Target Shooting; Surfing; Horse Riding)										
Football	4.5%	5%								
Rugby	5%	4.5%								
Cricket	8.5%	8.5%								
Hockey	5.5%	5%								

Fig 1.: 2022 Sport Wales' School Sport Survey Results for Pitch Team Sports

3. Of the main pitch sports for which outdoor playing pitch facilities are provided, football creates the greatest need and demand across all measures. It is also the only pitch sport which is

'bucking the trend/behind' all the national averages. The only exception to this is Rugby which has above the national average latent demand with football slightly greater than the national average in terms of unmet demand. Football is by far, the biggest and most popular/in demand formal outdoor sport in Wales – and its impact is growing.

- 4. As a result of its scale, the Social Return on Investment (SROI) for football is particularly noteworthy, amounting to £553m and predicted to rise to £664m by the end of the current strategy in 2026.
- 5. Ammanford AFC is shown in the diagram (Fig 2.) as a local example of this impact. It supports over 28 teams and currently over 480 registered players, this delivers a SROI amounting to £2.18m delivering £500k social impact; £361k economic impact; £1.3m positive healthcare savings.



Fig.2. FAW 2020 SROI Figures for Ammanford AFC

The Biggest Challenges for Grass Pitch Sports - Particularly Football

- 6. Despite the current high levels of activity, as well as the growing demand for more, there are serious challenges facing the future of grass pitch sports nad particularly football, given the number of clubs relying on good quality grass for an effective ball roll and bounce playing experience:
 - a. Many former public grass pitches are poor quality, for several historical reasons:
 - i. Poor drainage and original pitch construction.
 - ii. Reduced historic levels of maintenance with parks budgets consistently cut over the last 10 years.
 - iii. Vandalism bikes, litter, dog fouling.
 - iv. Flooding and poor weather in recent years, for as many as 4 consecutive weeks (over 10 weeks in exceptional periods of bad weather) games have been cancelled in a season, due to wet weather and waterlogged pitches.
 - v. Further pitch damage is caused due to their use in wet conditions as well as general overuse due to end of season fixture backlogs.

- b. As a result of lack of access to quality facilities and without better playing surfaces and support accommodation i.e. pavilions/changing rooms:
 - i. Training is limited clubs can play matches, but not train, on grass pitches.
 - ii. Levels of skill suffer and development particularly for football is hampered by poor playing surface.
 - iii. With poor facilities, or limited access to more or better facilities, clubs (particularly football) cannot satisfy demand or attract new audiences particularly women and girls.
 - iv. Women and girls' teams generally play when the pitch conditions are even worse having been 'cut up' by men's teams playing the day before.
 - v. Young people particularly girls are deterred from playing the game they most want to do.
- 7. The above facility challenges have a significant negative impact on participant experience, thus creating a real challenge to the need to satisfy growing demand, attract new, and retain existing players. This is particularly the case for young women and girls.
- 8. Going Forward, artificial surfaces are only part of the pitch solution and improvements to grass pitches and off-pitch pavilions/club houses, should be recognised as an investment priority, particularly for clubs supporting large numbers of players and teams; and even more so for those providing for significant numbers of women and girls.
- 9. Alongside AGPs, the Council should adopt fit for the future approaches to public open space i.e.:
 - a. New look Open Space and Planning Policies needed for local playing pitches fit for purpose zoning for informal recreation alongside formal sport.
 - b. Reviewed grass pitch needs alongside AGPs with a clear vision for strategic sustainable AGP hubs and better grass pitches and pavilions and support for more investment in specialist pitch assessments, enhanced maintenance, and workforce development.
 - c. For grass pitches in multi pitch park settings, it is also important to allow for the 'designation' and protection of formal sports facilities i.e. pitches, alongside informal recreational spaces i.e. for dog walking, community recreation, play, greater bio-diversity thus creating more fit for different purpose, designated zones/areas as part of a better future green, open space landscape.

VII: CLUB AND FACILITIES DATA

Sport and Club Data

Rugby

- 1. Carmarthenshire is the Local Authority in Wales with the largest number of rugby clubs as shown in the adjacent table. There are 37 clubs including a female hub. See table below (Fig.3).
- 2. Only 11% of the registered club membership is female and less than 40% of the clubs have 15 or more female playing members.
- 3. Fig.3. shows the clubs in order of membership size and it is recommended that highlighted clubs showing the largest membership/junior teams and female members should be priorities in the first instance, for future club support and investment.

Club	Female	Males	Totals	Youth teams	Senior teams
Burry Port RFC	29	371	400	10	1
Llangennech RFC	13	352	365	10	1
Tumble RFC	61	272	333	10	1
Newcastle Emlyn RFC	15	310	325	11	1
Carmarthen Athletic RFC	8	293	301	9	1
Whitland RFC	124	168	292	7	1
Llandeilo RFC	13	267	280	10	1
Carmarthen RFC	19	258	277	11	1
Llanelli Wanderers RFC	36	240	276	6	1
Felinfoel RFC	12	248	260	8	1
Ammanford RFC	21	234	255	7	1
Penybanc RFC	11	229	240	9	1
St Clears RFC	6	188	194	9	1
Pontyberem RFC	6	176	182	8	1
Tycroes RFC	17	165	182	6	1
Kidwelly RFC	15	157	172	8	1
Bynea RFC	21	141	162	6	1
Llandovery RFC	18	141	159	8	1
Nantgaredig RFC	18	131	149	5	1
New Dock Stars RFC	4	137	141	3	1
StradeySospans Female Hub	131	0	131	0	0
Brynamman RFC	10	115	125	7	1
Amman United RFC	5	118	123	4	1
Cefneithin RFC	6	100	106	5	1
Pontyates RFC	21	81	102	4	1
Furnace United RFC	0	81	81	1	1
Trimsaran RFC	10	69	79	4	1
Laugharne RFC	4	73	77	2	1
Yr Hendy RFC	4	73	77	4	1
Llandybie RFC	0	56	56	0	1
Betws RFC	1	45	46	0	1
Llanelli RFC	0	38	38	0	1
Llangaddog	0	36	36	0	1
Llanelli Warriors	0	33	33	0	1
Llanybydder RFC	0	31	31	0	1
Penygroes RFC	0	22	22	0	1
Pantyffynon RFC	2	14	16	0	1
37	661	5,463	6,124	192	36

Fig.3.WRU Data for Rugby Clubs in Carmarthenshire

Football

- 4. Carmarthenshire is reported to have over 40 registered football clubs with over 400 teams and 5,000 registered members. The distribution of clubs is illustrated in the map below.
- 5. However as shown in the following table (Fig.5.) of current formal registrations:
 - a. Only 17% of the football club registered players (under 6 to senior) are female.
 - b. Less than 40% of football clubs have 15 or more registered female members.
 - c. Only four clubs have a senior women's football team.

d. Only ten clubs have enough females in any one age group to field a female

team.

	Football Club Membership									
Facility		Total	Total	Overall	Potential					
Model	Club	Males	Females	Total	Total					
					Teams					
Level 1	Ammanford AFC	288	193	481	32					
	Llangennech	310	89	399	27					
Large	Johnstown FC	245	124	369	25					
Clubs 11-	Calsonic Kansei Swiss Valley AFC	263	100	363	24					
50 Teams	Camford Sports FC	194	71	265	18					
	Carmarthen Stars AFC	181	79	260	17					
	Cwmamman United AFC	211	3	214	14					
	Pembrey AFC	180	18	198	13					
	Seaside	193	2	195	13					
	Carmarthen Town FC	161	27	188	13					
	Bancffosfelen Junior FC	138	38	176	12					
	Dafen Welfare FC	172	4	176	12					
	Llandeilo Juniors	153	14	167	11					
14	Llanelli Town	126	34	160	11					
Level 2	Peniel Junior FC	129	13	142	9					
	Kidwelly Black Cats Junior FC	113	15	128	9					
Medium	Saron Juniors	108	8	116	8					
Clubs	Newcastle Emlyn FC	80	16	96	6					
	Boncath	89	5	94	6					
3-10	Towy Tigers FC	91	3	94	6					
teams	Llandeilo Town AFC	85	0	85	6					
	Bargod	83	0	83	6					
	CRC Olympic FC	83	0	83	6					
	Llandovery Junior FC	71	6	77	5					
	Trallwm AFC	67	0	67	4					
	Pencader Juniors FC	41	23	64	4					
	Llanboidy	61	0	61	4					
	West End United	61	0	61	4					
	Kidwelly Town FC	58	0	58	4					
	Bancffosfelen	57	0	57	4					
	FC Carmarthen	57	0	57	4					
10	Felinfoel AFC	53	0	53	4					
Level 3	Caerbryn	51	0	51	3					
Level 3	Llanybydder	36	15	51	3					
C	Drefach Women FC	0	47	47	3					
	Pwll Athletic	43		.,						
teams			0	43	3					
	Ferryside AFC Llansteffan Football Club	33	0	33	2					
		32	0	32	2					
	Abergwili Football Club	31	0	31	2					
	Kruf	29	0	29	2					
9	Pencader United FC	28	0	28	2					
	41	4,485	947	5,432						
		Female%:	17%							

Fig. 5. FAW Comet Data for Football Clubs in Carmarthenshire

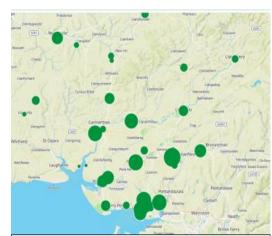


Fig. 4. Map showing distribution and size of football clubs in Carmarthenshire

Football and Rugby Targeting Double the Female Membership

- 6. With the growth in the participation and demand amongst young women and girls, the prioritisation of female football and the establishment of designated female clubs and hubs plugging gaps and strengthening those with large female numbers, is be a particular FAW focus for future club and facility development. WRU has a similar target.
- 7. To achieve the national targets of doubling female players registered to play in both Rugby and Football, would create a growth of over 1,600 women and girls in Carmarthenshire. The focus for this should start with the rugby and football clubs with a commitment and interest base demonstrated by high levels of existing membership i.e. the 40% with at least 15, female members.
- 8. This strategy for growth, starting with those clubs with a female membership or aspiration to grow will demand a focus on the provision of improved facilities, female hub nights on 3G pitches, alongside better-quality grass pitches and more welcoming female friendly pavilions toilets, changing rooms and social areas.

Hockey

- 9. In terms of Hockey, Carmarthenshire currently has three hockey clubs supporting 5-6 teams and shown as follows:
 - a. Clwb Hoci Teigrod Tywi over 150 members, who play on the AGP at Tregib in Llandeilo.
 - b. Carmarthen Hockey Club with over 100 members, who play on the AGP at Carmarthen Leisure Centre.
 - c. A new club Llanelli Hockey Club, who play on the AGP at St John Lloyd CS in Llanelli.
- 10. Currently, just under 15% of the estimated 300 hockey club members are male, with the sport in Carmarthenshire also predominantly female. The main focus for the Governing Body is to achieve stronger clubs at the main hubs and an overall growth in participation numbers through greater engagement activities.

Facility Data

Natural Turf Pitches and Pavilions

- 11. There are 97 outdoor locations (education, community club or Town and Community Council) throughout the County that provide natural and artificial turf pitches for football, rugby, cricket, and hockey as well as venues providing Multi use Games Areas (MUGAs) tennis courts and bowls greens.
- 12. In total there are over 162 grass rugby and football pitches as well as 14 cricket pitches (mostly located on grounds shared with rugby or football). All supported by over 70 changing blocks/pavilions. These facilities support over 75 football and rugby clubs and over 11,500 registered playing members. (**See ANNEX C**).
- 13. However, the quality of these pitches and pavilions varies considerably with much investment needed to improve quality to accommodate demand and more use, particularly for football pitches which tend to be located on former Council maintained parks and where the sport requires a flatter surface with a shorter, consistent pile to enable fast ball roll and consistent bounce.
- 14. As, the majority of Cricket Clubs are sharing grounds with Rugby or Football Clubs, there is also potential for Football and Rugby to collaborate further with Cricket in respect of the development and shared use of facilities.

Artificial Grass Pitch (AGP) Data

- 15. The Artificial Pitch Strategy for Wales A Collaborative Vision and Plan for Rugby, Football and Hockey, stresses the importance of **AGPS that are:**
 - a. Fit for purpose and complementary/not competing serving the sports' strategy priorities with the presumption being to satisfy the biggest local sports need unless there is a strategic business case rationale for the alternative.
 - b. Appropriately located, where need and impact is greatest with a sustainable, robust business case safeguarding access for priority groups and not displacing or duplicating existing AGP provision.
- 16. The AGP Plan for Wales also focuses on the following priority sporting outcomes:
 - a. Growth leading to more participants (particularly women and girls) and retention;
 - b. Stronger clubs/community hubs (i.e. for hockey hubs creating a stronger critical mass).
- 17. Other important considerations include the need:
 - a. For 'new look' school sites best serving the New Curriculum as well as linked to catchment community clubs i.e. school/club hubs.

- b. For local plans for AGPs viewed alongside a plan for grass pitches AGPs do not replace but complement natural turf, particularly for training and mini/junior football.
- 18. From the table below (Fig. 6.) provides an all-Wales summary of AGP (Artificial Grass Pitch) provision (Full Sized (FS) and Small Sized (SS)). In this, it is noted that Carmarthenshire:
 - a. Is 7th in Wales for the number of full sized AGPs. However, based on population it should feature in the top four Local Authorities.
 - b. Is 9th in Wales for the number AGPs per head of population (1 AGP per 19,000 people).
 - c. Has received the most Sport Wales Collaboration funding awards (7) and 2nd highest total grant at over £1.3m.

Council	ouncil 3G AGP		SP /	AGP	3G a	and SP			Collab		Collab £ per head
	Full Size 3G	Small Size	Full Size 3G	Small Size	Full sized AGPS	FS Per Head	Small Sized AGPS	SS Per Head	Amount	No	Amount per capita
Rhondda Cynon Taf	21	5	6	0	27	8,958	5	48,375	£505,000.00	5	£2.09
Cardiff	19	11	10	2	30	12,307	13	28,400	£275,000.00	2	£0.74
Caerphilly	12	7	2	1	14	12,981	8	22,716	£610,000.00	5	£3.36
Vale of Glamorgan	8	4	3	7	11	12,300	11	12,300	£400,000.00	2	£2.96
Carmarthen	6	5	4	5	10	19,007	10	19,007	£1,130,788.00	7	£5.95
Swansea	6	0	3	6	9	27,396	6	41,094	£1,393,655.00	6	£5.65
Conwy	6	4	3	2	9	13,132	6	19,697	£369,360.00	3	£3.13
Wrexham	6	2	1	1	7	19,436	3	45,352	£321,500.00	2	£2.36
Neath Port Talbot	6	2	3	8	9	16,043	10	14,439	£236,412.00	3	£1.64
Flintshire	5	5	4	0	9	17,427	5	31,369	£518,769.00	4	£3.31
Newport	5	7	2	4	7	22,350	11	14,222	£460,000.00	2	£2.94
Bridgend	5	5	3	9	8	18,442	14	10,539	£125,000.00	2	£0.85
Merthyr	4	2	1	1	5	12,085	3	20,141	£450,000.00	2	£7.45
Monmouthshire	4	3	5	0	9	10,574	3	31,721	£637,325.00	5	£6.70
Gwynedd	4	5	6	6	10	12,517	11	11,379	£693,820.00	4	£5.54
Pembrokeshire	4	2	3	2	7	18,107	4	31,688	£411,000.00	2	£3.24
Ceredigion	3	3	2	1	5	14,579	4	18,224	£491,668.00	5	£6.74
Blaenau Gwent	3	2	0	1	3	23,340	3	23,340	£352,000.00	2	£5.03
Powys	3	1	8	4	11	12,094	5	26,606	£46,476.00	1	£0.35
Anglesey	1	4	1	6	2	35,220	10	7,044	£635,000.00	6	£9.01
Torfaen	1	2	3	4	4	23,708	6	15,805	£214,791.00	2	£2.26
Denbighshire	1	2	3	1	4	24,166	3	32,221	£0.00	0	£0.00
Total	133	83	76	71	210		154		£10,277,564.00	72	£3.24

Fig. 6. All Wales Distribution of Artificial Pitches and Collaboration Funding

- 19. Fig. 7. on the following page shows the current, and planned/potential, AGPs distributed across the County with a total of:
 - a. 22 small and full-sized artificial pitches.
 - b. 6 current full-sized 3G pitches.
 - c. 4 current full-sized Short Pile pitches.
 - d. 4 planned, plus a further 7 identified as potential areas of need for additional fullsized 3G pitches.
 - e. These are needed to service the winter training needs of an estimated 79 clubs, over 11,000 members and current 600-750 teams with a target growth of an additional 300 teams.

Location	Large/Full Size 3G AGP	Large/Full Size Short pile AGP	Small Short Pile AGP	Small 3G AGP	Planned AGP	Potential Needed AGP To Serve Club Hubs	Priority #: Current Club/Member Demand-Potential
NW Carmarthenshire - Ysgol Newcastle Emlyn						Potential 3G from Grass	5: 7Clbs/678Mbrs - 22 Target Team Growth
West Carmarthenshire - Ysgol Dyffryn Taf Whitland						Potential 3G from Redgra	7: 4Clbs/624Mbrs - 12 Team Target Growth
Carmarthen Town West - University of Wales Trinity St David Johnstown Fields/Carmarthen LC					Planned 3G from Grass		3: 6 Clbs/ 1056Mbrs- 22 Team Target Growth
Carmarthen Town West - Athletic RFC Alltynap Rd				Indoor IRB			
Carmarthen LC		2018/19 resurface					
Carmarthen Town Centre - Town FC, Richmond Park	FIFA 1* 2017						
Carmarthen Town University of Wales Trinity St David				2023			
Carmarthen Town Rural -Ysgol Gyfun Bro Myrddin						Potential 3G from Grass	10: 3Clbs/450Mbrs 12 Team Target Growth
Gwendraeth Valley East - Ysgol Maes y Gwendraeth Cross Hands	IRB 2014						C . G
Gwendraeth Valley West - Ponty berem Park RFC				1			
Gwendraeth Valley West - Pontberem						Potential 3G from Grass	9: 4Clbs/517Mbrs- 14 Team Target Growth
Cefneithen Park Cross Hands Community Council			1				Growth
Llanelli East - John Lloyd CS		Gen 2 2020					
Llanelli East - Llanegennech RFC/Hendy						Potential 3G from Grass	1: 7Clbs/1246Mbrs- 28 Team Target Growth
Llanelli Urban - Parc y Scarlets Llanelli				Indoor IRB			
Llanelli Urban - Ysgol Bryngwyn					Planned 3G from Redgra		6: 3Clbs/676Mbrs- 12 Team Target Growth
Llanelli LC			³4 ATP c 2008				
Llanelli Town Centre - Ysgol Coedcae				Planned 65x55 3G from Redgra - Not Full Sized			11: 2Clbs/396Mbrs -10 Team Target Growth
Llanelli South - Penrhos PS /Bwlch Rangers	Football 3G 60mm/no s/pad 2019			1100 1 411 31204			0.000
Llanelli West -Coleg Sir Gar, Graig Campus	FIFA 1* R/F 2016						
Carmarthen Bay - Ysgol Glan y Mor, Burry Port					Planned 3G from Redgra		2: 7Clbs/1068Mbrs- 26 Team Target Growth
Carmarthen Bay - Kidwelly (for review post Glan Y Mor development)						Potential 3G from Grass	8: To be reviewed after Glan Y Mor
Amman Valley - Ammanford LC / Ysgol Dyffryn Amman/Amman Vallley CS	Rugby /Football 3G within Athletics Track						
Amman Valley - Ammanford LC / Ysgol Dyffryn Amman/Amman Vallley CS		2022 resurface					
Ammanford Town, Ammanford Rec						Potential 3G from Grass	4: 2Clbs/736Mbrs-10 Team target
Upper Amman Valley - Cwmamman Counci/Ysgol y Bedol				1			
Dinefwr Valley - Old Tregib School, Llandeilo		2023 resurface					
Dinefwr Valley - Ysgol Bro Dinefwr, Fairfach, Llandeilo	Not floodlit						Priority to Floodlight and increase community access
North East Carmarthenshire - Llandovery RFC					Planned Rugby 3G Planning approved		12: 3Clbs/272Mbrs- 8 Teams Target Growth
North East Carmarthenshire - Llandovery College			½ ATP 2008				Siowai
Total Total FS 3G	6	4	3	6	4	7 17	
Total Full Size						21	

Fig. 7. Distribution of current, planned and potential Artificial Pitches in Carmarthenshire

- 20. Based upon a target of c4 rugby/football clubs, depending on size, forming a 3G hub consortium, there should be no less than 17 3G AGPs across the County. Currently there are six with a further four identified as planned. Based on mapping rugby/football clubs into potential hubs based at 3G AGPs, this plan identifies a potential need for a further seven 3G AGPs (which would create a total of 17). Noting that not all of these are on sites suitable to provide a shared hub model to serve catchment clubs.
- 21. This is strategic assessment of demand and needs based on current and target clubs, teams and players. **See ANNEX E.** This is qualified by the need for local feasibilities and business plans informing each case for investment, and determining the sustainability of each local AGP model. Further, noting that is not feasible for all of the proposed AGPs to be based on recommended education sites. Where this is not an option, they will need a venue which is accessible, and viable as a sustainable shared club hub.
- 22. Four short-pile AGPs for Hockey, currently exist. Based on club and team numbers, the recommended number for the County would be no more than three for the purposes of providing for a hockey hub in the South, East and West of the County, noting most hockey club use of an AGP rarely exceeds 20% of the bookings. The three hockey clubs should have priority use of the Short Pile Carpet AGPs at: Llandeilo; Carmarthen and Llanelli.
- 23. However, despite the demand for 3G AGPs, careful consideration does need to be given to the significant capital investment and lifecycle costs, as summarised below. These costs emphasise the importance of having strong club hub usage and management plans; robust maintenance plans; alongside annual set aside funds for replacement carpets every 7-10 years (depending on usage levels) i.e.:
 - a. Over £10m capital funding required to deliver the potential and planned new 3G AGPs.
 - b. Over £3.5m capital liability every 10 years for the replacement of current full sized AGPs increasing to a £10m ten-year capital liability for all planned and current as well as small sized AGPs.
- 24. Fig. 8. on the following page provides a summary breakdown of the figures informing the above estimates.

25. The current, planned and potential AGPs in Carmarthenshire are indicated on the map in Fig. 9, alongside the distribution of club hubs for catchment football and rugby clubs.

Location	Large/Full Size 3G AGP	Large/Full Size Short pile AGP	Small Short Pile AGP	Small 3G AGP	Planned AGP	Potential Needed AGP To Serve Club Hubs
Total	6	4	3	6	4	7
Initial Capital						
Note Allowances (excl Inflation):						
£1m for conversion of grass to 3G from grass with						
floodlighting and fencing					£ 3,500,000	£ 6,500,000
£500k for conversion of Regra to 3G with floodlight					1 3,300,000	0,300,000
and fencing						
£350k for for conversion of Short Pile/Sand AGP to						
3G (assuming fencing/floodlghting in place)						
Annual sinking Fund Cost						
Note Allowances:						
£35k pa for F/S AGPs						
£20k pa for small sized AGPs	£ 210,000	£ 140,000	£ 60,000	£ 120,000	£ 140,000	£ 245,000
						10Year Liability for
		Current FS AGP				all Planned, Needed,
		10Year Liability				Current AGPS across
						Carmarthenshire
Annual sinking Fund for All						
(excl Inflation)		£ 350,000				£ 950,000
Ten Year Replacement Costs (exl inflation)		£ 3,500,000				£ 9,500,000

Fig. 8. Summary of indicative planned AGP construction and consequential lifecycle liability costs.

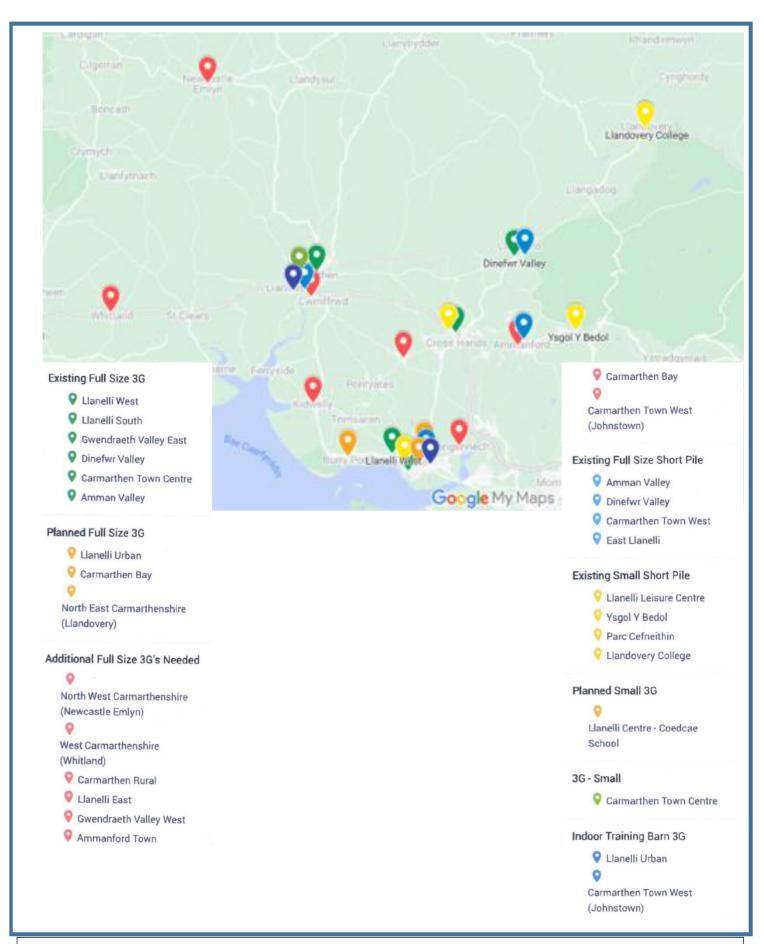


Fig. 9. Distribution of Current and Required AGPs to support shared club hub needs

Recommendations for Action – Informing future AGP provision

- 1. Establish a long-term financial plan to cover the current replacement funding liability of nearly £10m, and that takes account of rising AGP costs, pricing policies and environmental impact.
- 2. The Development of future AGPS to be considered only following a robust feasibility and business planning process to cover:
 - a. Design and specification based on a community business case and usage plan.
 - b. A sustainable, robust business case safeguarding access for priority groups.
 - c. The establishment of a club hub management group, with clear access protocols.

3G AGP Installation Considerations

26. Undoubtedly there are several benefits that arise from having 3G AGP pitch facilities – making them a popular choice of AGP amongst club and education institutions.

27. Users can expect to experience:

- a. An all-year-round playing surface, in all weather conditions, although snow and frost can be an issue affecting use.
- b. Reduced maintenance costs when compared with high quality natural turf and hybrid pitches. **However, they are more expensive to maintain** when compared to basic, club standard, grass pitches.
- c. Environmental benefits include savings in respect of pitch irrigation.

28. Set against these benefits are:

a. High costs of installation.

- b. Further investment of no less than £350k between Years 7-10 to replace the carpet and perhaps up to £80k in the 2nd replacement cycle to replace any shockpad.
- c. Additional maintenance obligations and costs.
- d. Negative environmental impacts, which include:
 - i. Ongoing concerns regarding the safety of infill materials including the potential for the pollution of water ways and drainage systems through the migration of rubber crumb and microplastics – spilling off the pitch, via footwear and clothes. However, it should be noted that the EU are proposing to ban rubber crumb infills for 3G pitches².

² The EU ban on rubber crumb infills: The proposal is that from 2029 it will not be possible to buy rubber crumb, but pitches with rubber crumb can remain. Therefore, for a pitch lasting 10 years the last use would

- A useful update, shared recently by the Football Foundation in England, on future 3G AGP considerations takes account of changing European legislation that will affect future design criteria without the use of rubber infill, is summarised in **ANNEX A.**
- ii. Travel time grass pitches tend to be 'closer to home' and within a reasonable walking and cycling distance, whereas 3G pitches tend to demand no less than a 20minute drive time, with the associated negative carbon footprint implications.
- iii. Recycling challenges the spent materials cannot be landfilled and have to be removed from site, deconstructed via expensive technology or transported and cleansed for re-use in other settings.
- 29. For financial and sustainability reasons, current evidence in Wales, shows that it is unlikely that single voluntary sector organisations i.e. individual clubs, will be in a position to establish the necessary cash balances to cover the necessary lifecycle costs and thereby secure the sustainability of the facility through the funding of the replacement carpet between Years 7-10.
- 30. Therefore, the full potential of artificial surfaces, for most organisations, will only be realised on shared sites which are developed through Local Authority/Education and club partnerships.
- 31. This vision and plan recommends that the development of 3G AGPs should only be considered as a shared club hub facility, for example on an education site, where a number of clubs can share a quality facility, where maximum use can be made of the pitch in the day time, as well as evenings and where the riparian responsibility for maintenance and replacement falls to a statutory body.
- 32. However, even shared club hub developments can only be considered a good approach if supported by the necessary feasibility and business planning process the early preparation of pre-construction plans and establishment of the hub management group, along with access protocols to benefit all hub catchment clubs.

be in 2039. (The European Parliament is expected to vote on this in 2023.) The main rubber crumb producers are in the UK and Denmark and it is hard to say if the UK will follow the EU. If it does, and suitable alternative infill/s cannot be found, then 3G carpet manufacturing may decline and there may be a shift to hybrid turf pitches.

Summary Sports Facility Conclusions

- 33. This vision and plan highlight the large number of full-sized AGPs in the County and significant capital and running costs as well as growing technology challenges that will be incurred with future replacements and liability costs. Currently these amount to nearly £900k pa, but this figure will only grow.
- 34. Artificial pitches are also only a small part of the solution for pitch sports and future sports facility priorities should focus on natural as well as artificial turf facility categories:
 - a. Grass pitches formally designated sports pitches to achieve, **better pitches with** more use and better pavilions serving as fit for the future club grounds.
 - b. AGPs designed as education/club hubs on education sites best located to serve the dominant sports/club communities, and where there is potential to create a strong community partnership management model.
- 35. Regardless of the obvious different sporting needs and specialist facility requirements, the sports all share common needs and priorities.
- 36. The visions for clubs and facilities are common to all the sports, and include:
 - a. Developing better quality, fit for purpose facilities for all.
 - b. Supporting strong sustainable clubs with their own pitches and pavilions.
 - c. Inclusive and welcoming off-pitch, community club facilities accessible to women and girls', people with disability and from all minority ethnic backgrounds.
 - d. Club hubs ensuring effective shared use of AGPs.
 - e. Designing the above to be attractive to women and girls, young people and underrepresented groups generating more members and facility use all year round.
 - 37. Given the significant scale of demand in terms of clubs, players and facility needs, it is recommended that the facilities priorities, following consultation, should identify 'focus facilities' in locations that meet the following criteria:
 - a. In a strong 'football, rugby or hockey sports club local community'.
 - b. Where there are changing rooms/pavilion offering potential to develop a future club house/social base.
 - c. Where there is reasonable access and a safe setting.
 - d. Where there is a demand from and/or track record of developing the women's game.
- 38. The following scoring matrix (Fig. 10), which is based on current grant funding guidelines, is designed to provide a framework for prioritising future facility projects for funding and support.

Recommendations for Action – Informing future AGP provision

- 1. Establish a county-wide target for AGPs, confirming if 17 3G AGPs is the desired target
- 2. Prepare a master map of AGPs with catchment clubs noting that not all AGP sites are suitable to provide a shared hub model to serve catchment clubs.

	Club and Facility Prioritisation Criteria Scoring										
	Priority Factors										
lm	pact: A Priority Factors (the Outcomes)										
1	Enabling participation growth i.e. location reaching large school/community catchment and accessibility										
<u>2</u>	Impacting across a range of age groups i.e a pathway - catchment clubs with age group pathways (minimum 4 different age groups)										
<u>3</u>	Improving quality of user experience impacting retention i.e. good access, supportive management model, welcoming support accommodation										
4	Improving environment and access to facilities for women and girls i.e female priority usage/nights and hubs, female friendly designs										
<u>5</u>	Supporting stronger more sustainable clubs i.e. stronger club more footfalls/visits, workforce support, reveune share trough club hub formed 4-5 clubs										
lm	pact: B Priority Factors (the Outcomes)										
1	Attracting under-represented groups, achieving greater equality, diversity and inclusion i.e. target usage plans, success with target users/members										
<u>2</u>	Impacting socio economic disadvantage i.e. located/used by people from an agreed priority area of multiple deprivation (highest 50% WIMD)										
3	Evidence of need/case i.e. pre-start consultations, community engagement and club hub formed										
4	Strong partnerships and community focussed i.e. evidence of community engagement/ project partnerships; design of surface/facility serving majority number of partners										
<u>5</u>	Spreading the impact i.e. multiple sports, teams, activities, age groups and audiences										
	Total score to be weighted below										
Op	erations: C Priority Factors (Deliverable and Sustainable)										
1	Financially sustainable i.e. accessible/affordable/targeted and consistent pricing policies as well as replacement funding plans										
<u>2</u>	Environmentally sustainable i.e. LED lights; EV chargers; solar panels; thermal insulation; drainage and water management; efficient heating system										
3	Measurable impact i.e. a clear shared vision and agreed minimum 5 measurable outputs/targets										
4	Deliverable i.e. sound project delivery plan and sound communty /hub management model										
<u>5</u>	Appropriate design brief i.e. to deliver the project to meet needs, usage plans and successful outcomes - the right size/surface/access etc										
<u>6</u>	VFM i.e. appropriate cost, partnership funding and beneficiary numbers										

Fig. 10. Scoring Matrix for Prioritising Facilities and Clubs for Support

VIII: FUTURE FACILITY CONSIDERATIONS

Financial Considerations

- 1. Future plans need to reflect significant cost increases in AGPs. These are currently shown as:
 - a. Training areas with 40mm-50mm pile 3G pitch; fenced; sports lighting overall dimensions 61mx43m, playing area 55mx40m. Indicative capital costs £445,000 (exclusive of VAT).
 - b. Full sized 40mm pile 3G pitch, fenced, with sports lighting overall dimensions 106mx70m with a playing area of 100mx64m with 3m run-offs to all sides up to the first obstruction. Indicative capital cost up to £1,020,000 (exclusive of VAT).
 - c. These costs are going to continue to spiral as the global economy, supply of materials, technical standards and environmental considerations impact design. ANNEX A includes some guidance on options for keeping costs down.
- 2. Pricing policies also need to take account of a number of factors:
 - a. Consistency across providers, avoiding a 'postcode lottery' with significant variations across operators and areas.
 - b. New groups with fewer initial numbers find it harder to generate the necessary revenue funding for hire costs interim 'start up' rates for target/priority groups should be considered.
 - c. Consideration given to different rates for weekends encouraging use for junior and female fixtures.
 - d. Club reluctance to pay the 'going rate' to use 3Gs when they have free access to grass pitches or cheaper AGPs. When there are light evenings, clubs will revert to grass pitch training.
- 3. To overcome the reluctance of many clubs to pay the going rate for the hire of AGPS, partly due to familiarity with grass pitch fees, guidance on the capital and running cost of facilities should be promoted to achieve a greater awareness.

Pitch Dimensions

- 4. There are no set dimensions required for AGP teaching or training areas.
- 5. Generally, unless the 3G is in an existing stadium ground, they are unlikely to be used for senior competitive rugby or football in the top tiers of the game. At these levels' spectator rails, stands, dug-outs and hard standing are required to meet league licensing standards and the use of different coloured pitch markings are strictly governed.
- 6. Senior competitive teams are already established using the existing grass pitch/stadium infrastructure. Therefore, the priority for use should be for training and junior/women's football fixtures, for whom the artificial surface is particularly beneficial.

- 7. Where there is a business case for a full-sized competition pitch to host senior football matches in recognised competitions, the AGP should be designed with a 'field of play' to meet the dimensions for 11v11 football at the required levels as shown in **ANNEX D.**
- 8. As well as meeting the required competition dimensions for the field of play, allowance should be made to meet **the industry standard of 3m run-offs for player safety**, measured from the edge of the field of play to the nearest obstructions i.e. floodlights, pitch rails or dug outs.
- 9. **Except in special cases,** because of the shared usage challenges with track activities alongside the playing of ball sports, to maximise the value of the investment, **AGPs are not recommended for future developments within athletics or cycling tracks.** An AGP should be fenced to contain balls and play, this isn't feasible inside a track and results in:
 - a. Players with studded boots running across the track to recover balls, distributing infill from the AGP via their footwear across the track and returning to the AGP with mud and grass contaminating the infill of the AGP.
 - b. Practical limitations on simultaneous sporting use to mitigate health and safety risks;
 - c. Use of the facility for athletics is limited to track events with field events displaced.

Education Site, AGP Club Hubs

- 10. Given the significant capital and running cost implications of developing full-sized AGPs, it is recommended that they are generally best located on a School/College/University sites to maximise day-time use and optimise impact with these opened up for community use and managed as a club hub to deliver dual use with off pitch accommodation.
- 11. The long-term vision to develop collaborative sports club hubs, based at AGPs located on all secondary school/college sites around the County. The hubs will provide improved community and club access to education site facilities, and support a collaborative sports club community, which will serve to strengthen the games.
- 12. As well as a 3G pitch, approaches to the improvement and use of grass pitches/other sports facilities MUGAs and Halls as well as 'outdoor classrooms/club rooms' on the education site can also be developed to provide additional opportunities for learning and clubs in the 'Hub'.
- 13. Education/club hubs should be established as a partnership between the education provider and a consortium of the catchment clubs. They will be made up of the following organisations:
 - a. Sports clubs in the catchment area.
 - b. The education provider and its feeder schools/colleges.
 - c. Any other key organisations in the community who can play a supportive role.
- 14. The Hubs should be supported by the Council/NGBs and Leagues.

- 15. Hubs should be coordinated/managed by the facility operator in partnership with hub clubs under a SLA with Council.
- 16. A Hub Management Group (HMG) of key partners is established ensuring the facilities are used to their full potential and as inclusively as possible.
- 17. The HMG's first responsibility is to support the development of effective AGP usage plans, ensuring the facilities are used to their full potential and as inclusively as possible.
- 18. The HMG will support other joint school/club activities i.e.:
 - a. Girls' development programmes.
 - b. Education partnership activities that serve young people and their learning.
 - c. Equitable opportunities i.e. disability, mental health, walking/recreational participation etc.
 - d. Grounds maintenance and other volunteer training.
 - e. Supporting the hub clubs to become stronger with their own club business plans and management models.
- 19. The Hub should also adopt a sports vision and plan for the education provider at the heart of the Hub, to include:
 - a. Learning through sport: helping develop and pilot sports education for young people and teachers in partnership with the NGBs; supporting adult and community learning.
 - b. A future facilities vision and plan embracing:
 - i. The vision for the AGP developed and used/managed in partnership through the Hub.
 - ii. A plan for any grass pitch hub club usage including exploring appropriate hub club partnerships re management and maintenance.
 - iii. A vision for off pitch support accommodation, changing and social spaces doubling up as an alternative classroom/recreation space.
- 20. In exceptional circumstances, where consideration is given to AGP provision on non-shared education sites business case requirements must include:
 - a. A significant local population size and density large town catchment.
 - b. Impact on other existing AGPs avoiding competition, displacement and duplication.
 - c. Visibility of public location.
 - d. Robust business planning including:
 - i. County wide comparable and accessible pricing policies.
 - ii. Ensuring sporting benefits such as weekend v peak evening rates.
 - iii. Provision for £50k pa running costs £30k sinking fund plus maintenance.

Sequence of Actions to Inform Future AGP Hub Investment Decisions

21. Upgrading facilities on school sites and community sites to AGPs should be based on satisfying evidence of education and community need set out in a robust business case.

- 22. The core activities should inform the size of pitch and choice of surface i.e. rugby, football or hockey or as a mixed purpose surface and whether for training or competition.
- 23. SLAs between the Local Authority/Funder and School Governors/Operator to establish:
 - a. A sporting hub with catchment clubs.
 - b. A consistent County wide access and pricing policy.
 - c. Correct footwear policies including the establishment of boot banks.
 - d. Usage agreements.
 - e. Access to shared community/education club room and changing this may need new provision.
 - f. Management and maintenance arrangements.
 - g. Replacement of carpets policy based on playability for football and hockey requirements.
 - h. In the case of rugby with shockpad World Rugby Clause 22 testing requirements.
- 24. No new/replacement pitches should be progressed until the SLA agreement is signed off.
- 25. Retrospective agreements to be established for AGPS that sets out that no further reinvestment will follow for replacement carpets which for 3Gs will be very much more expensive than current replacements due to new EU legislation in respect of microplastic infills.

Fit for Future Generations Innovative School Site Plans

- 26. The following section describes the vision for a new look school site that delivers both educational and wider community benefit making the facility work for all.
- 27. Where new school developments are proposed they should be designed to support the creation of a community partnership that delivers quality pitches with accessible changing rooms, social and catering facilities on-site, together with teaching/coaching and meeting rooms.
- 28. New look creative designs for Schools should:
 - a. Serve community sports needs as well as inspiring young people.
 - b. Support stronger school club and community partnerships club hubs.
 - Provide welcoming off pitch facilities supporting community sport hubs plus serving day time school needs off-pitch club rooms enabling community use and including female friendly facilities.
 - d. Involve innovative multi-sport design solutions for Primary, Secondary & 'Through' Schools including consideration of different types of spaces i.e.:
 - i. Compact Athletics.
 - ii. Cruyff courts for special needs.
 - iii. Combo courts for multi sports skills.
 - iv. Areas for wheeled sports and learn to ride training.
- 29. Where new or upgraded outdoor facilities are proposed, appropriate off pitch facilities should be considered including a Community Club Hub/Daytime 6thform/senior pupil informal learning, relaxation, mental wellbeing and study centre.

- 30. The indicative design brief for the school site community club and pupil centre is that it should provide:
 - A space for pupils to study think and relax during school hours switching to an environment where sports clubs can thrive during community use (Fig. 11).
 - b. An attractive and fit for purpose 'home' facility, a 'honey pot'/'magnet' for the area for clubs, players, parents, profile.



Fig. 11. Community Club/School Space

- 31. The initial planning process should set out the user requirements for male, female and disabled users, it should account for future changes in participant groups, as well as considering different needs, together with the establishment of a design brief that is fully inclusive see the link to the FAW's 'Environments for Her' guide at the end of this document (ANNEX B).
- 32. Consultations must be held with students and teachers regarding school learning and recreational needs.
- 33. The standards needed to meet sports team/officials and competitive requirements are set out in **ANNEX B** at the end of this document.
- 34. The player and coach requirements should be established alongside the needs of the school, officials, and spectators.
- 35. Then confirm if there are any non-playing requirements for the general membership and other user activities the after-match needs.
- 36. Assess the current infrastructure, if this takes the form of an upgrade, carry out a structural and services condition survey, as well as reviewing and addressing what works well and what causes a problem for users.
- 37. Consider the overall site and relationship between the access, car parking and pitches, to the off-pitch infrastructure, making sure that the development maintains all of the required, child protection and security standards. The location, traffic and pedestrian flow should all be visible accessible, safe, and well lit.

Recommendations for Action - Community Focused Schools Policy

- 1. Establish a shared Education and Leisure plan, with an agreed rationale and clear guidance informing any prioritisation and investment criteria, embracing a vision for:
 - a. 'New look' school sites can deliver both educational and wider community benefits.
 - b. Layouts that maximise use of outdoor spaces.
 - The development of off-pitch community club hub/student wellbeing and study centres.

Implementing Strict Footwear Protocols

- 38. The use of flat soled shoes on the 3G is a concern signage re correct footwear should be erected and stricter rules must be introduced.
- 39. 3G pitches should not be developed on school or other sites if the usage and correct footwear protocols cannot be managed or the artificial pitch is needed as a playground/break-time recreational area for students.
- 40. Trainers and ordinary shoes will flatten the carpet particularly for the longer 'rugby pile' carpets. The consequential impact will include carpet burns and injuries with the facility also becoming unfit for football ball roll and bounce and failing any governing body certification.
- 41. The estimated financial impact of this on the reduced carpet life equates to the equivalent of two years sinking fund i.e. £70,000.



Fig. 12. Clear and Strict Footwear Communications

- 42. Users without proper boots should be moved onto to other surfaces i.e. a short pile carpet/macadam courts where trainers are suitable.
- 43. 3G operators should also create boot-banks for those users who do not have appropriate footwear.

Putting Plans in Place Before Funding and Construction

- 44. 'Get it right before build' the Local Authority plan must inform local priorities and actions, creating:
 - a. A vision and leadership role for schools.
 - b. Sports club hubs and management plans before building.
- 45. Sports plans illustrating priority sports needs and informing robust usage plans should also be established from the outset to inform the rationale and strategic criteria for provision i.e.
 - a. Size of AGPs training or competition.
 - b. Types of surface and implications increased replacement costs; testing requirements; location; management and maintenance.
 - c. Sports Bodies/Local Authority to bring together clusters of clubs to establish the local usage, access pricing policies and business plans for 'hotspots' and catchment club hubs.

Environmental Sustainability Considerations

- 46. The future approach must recognise changing technology and the environmental negative and positive impacts of natural turf and artificial pitches. It is therefore essential that the plan includes:
 - a. Investment to introduce energy saving features i.e. AGPs floodlit with LED lights.
 - b. Consideration re the future use/disposal (no landfill) for old 'plastic carpets' and their rubber crumb infill.
 - c. Consideration re the challenge of managing microplastic infills in 3G pitches (ANNEX A).



Fig. 13. Responsible Carpet Disposal Plans

Small Multi Use Games Areas (MUGAs)

- 47. Multi Use Games Areas (MUGAs) can be found in local communities across Wales. They are often installed alongside sports pitches, skate parks and play areas, or converted from disused tennis courts. Ideally, to maximise community use they would be floodlit although their location in the heart of residential areas with a fear of attracting anti-social behaviour is often a deterrent for allowing floodlit evening use.
- 48. MUGA surfaces vary enormously from macadam to different forms of carpet. There are over 150 small sized artificial grass training areas across Wales.
- 49. Recent research by the Football Foundation in England has established that:
 - a. Traditional MUGAs are not inspiring activity spaces.
 - b. One size doesn't best fit all areas and needs.
 - c. The best MUGA projects are designed and delivered in partnership with the community via a community feasibility and business plan.
 - d. Targeted groups are more likely to use the facility if they have been involved in the consultation.
 - e. Access to the facility is as important as the facility itself; facilities need to be bookable with CCTV– with on line digital systems/apps and linked gated entry system.

50. The Football Foundation's new PlayZones https://footballfoundation.org.uk/playzones are safe, inclusive and accessible outdoor facilities that bring communities together through

recreational forms of football and a range of other sports, with either non-infill short pile, sand filled or polymeric surfaces.

51. Other recent developments that have created attractive multi activity courts for children and in particular for children in special schools have included Cruyff Courts.

<a href="https://www.cruyff-foundation.org/en/what-we-do/outdoor-sports-facilities/cruyff-foundation.org/en/what-we-do/outdoor-sports-facilities/cruyff-foundation.org/en/what-we-do/outdoor-sports-facilities/cruyff-foundation.org/en/what-we-do/outdoor-sports-facilities/cruyff-foundation.org/en/what-we-do/outdoor-sports-facilities/cruyff-foundation.org/en/what-we-do/outdoor-sports-facilities/cruyff-facilities/cru

courts/



Fig. 14. New Look More Attractive MUGAs i.e. Play Zones

- 52. These developments and learnings are evidence of the potential value of different MUGAs in different settings alongside a need to give careful cosndieration to their location and design through robust feasibilities.
- 53. Many sports clubs have also developed small sided AGP training areas to support club training and development needs. In these cicrcumstances they are often seen as an income generator and means of avoiding the cost of hiring nearby full-sized AGPs. Such facilities should be considered in context with other provision in the same catchment to avoid displacement and the proliferation of unsutainable facilities which are difficult to maintain and for which there is insufficinet funding to pay for replacements surfaces, every 10-15 years or sooner depending on intensity of use.

IX: RECOMMENDED IMPLEMENTATION PLAN

Three Step Implementation Plan

Step 1

Establish the Recognise the County-Wide Priority Clubs that have potential to deliver greatest impact and satisfy the needs set out in this vision and plan

Step 2

Create and agree an Education and Leisure Plan for all school site developments and operations

Establish the infrastructure needs to include off pitch provision

Establish clear protocols for the management and community relationship to include community access

Step 3

The future facilities development plan based on the sports priorities needs and outcomes and identified infrastructure needs including surface and size, a clear community business case, the identification of long-term liability and means to deliver all future replacement requirements.

Recommended Actions Emerging from the Report

A: National Governing Body (NGB) Sports Partnerships and Priorities

- 1. Establish a NGB partnership forum to support the implementation plan assist with establishment of investment priorities.
- 2. Work in partnership with NGBs to prepare sports specific visions to inform the facilities priorities and actions.
- 3. Establish the priority sports and clubs based on evidence of need and impact.
- 4. Establish the facility priorities necessary to address challenges / achieve the desired impact i.e. priority club facilities and strategic grounds together with the infrastructure needed to

satisfy the activity growth targets set for the sports, particularly facilities fit for females.

5. Work with NGBs to prioritise the clubs with the largest membership (juniors and females) and potential, together with the greatest facility needs, to ensure that future outcomes are achieved.

B: Planning Policy

- 6. Prepare a vision with Planning Policy for fit for the future and different purpose outdoor sports spaces, as part of a wider vision for open space.
- 7. Apply the LDP policies and recommendations to the future playing pitch plan priorities.

C: Community Focused Schools Policy

- 8. Establish a shared Education and Leisure plan, with an agreed rationale and clear guidance informing any prioritisation and investment criteria, embracing a vision for:
 - a. 'New look' school sites can deliver both educational and wider community benefits.
 - b. Layouts that maximise use of outdoor spaces.
 - c. The development of off-pitch community club hub/student wellbeing and study centres.

D: Informing future AGP provision

- 9. Establish a county-wide target for AGPs, confirming if 17, 3G AGPs is the desired target
- 10. Prepare a master map of AGPs with catchment clubs noting that not all AGP sites are suitable to provide a shared hub model to serve catchment clubs.
- 11. Establish a long-term financial plan to cover the current replacement funding liability of nearly £9m, and that takes account of rising AGP costs, pricing policies and environmental impact.
- 12. The Development of future AGPS to be considered only following a robust feasibility and business planning process to cover:
 - a. Design and specification based on a community business case and usage plan.
 - b. A sustainable, robust business case safeguarding access for priority groups.
 - c. The establishment of a club hub management group, with clear access protocols.

X: ANNEXES

ANNEX A: FOOTBALL FOUNDATION MICROPLASTICS UPDATE JANUARY 2023

The Football Foundation (FF) produced an update on 3G Pitch Microplastic Infill Materials in January 2023. The following is a summary of the key facts arising.

Health considerations

Studies completed by ECHA (European Chemicals Agency) have continued to prove that playing on AGPS is safe, provided the levels of 'Poly-Aromatic Hydrocarbons (PAHs) – the microplastic/rubber crumb infill levels are within set criteria.

SAPCA (Sport and Play Construction Association) 'Quality Control Protocol for Sports Performance infill' which places restrictions on the levels of PAHs within infill systems will be a mandatory requirement for any 3G AGPs funded by CFF.

Environmental considerations

In September 2022 - EC (European Commission) proposed introducing a ban on future sale of polymeric infills. This is likely to be approved by EU Members and introduced in Quarter3, 2023. There will be a six-year transition after which, from 2029, it will not be possible to purchase rubber crumb infill for use in 3G pitches.

It should be noted that this is not a ban on the use of these pitches and the UK Government will also be making its own decision on this matter – it may not adopt the same approach as the EU.

Like the FF, the Cymru Football Foundation (CFF) will not make any immediate change to the provision or funding of pitches without rubber crumb infill – the systems are currently unproven and the industry is as not as yet ready to deliver new facilities at the required scale.

It will however require the design of 3G AGPs to comply with the SAPCA Quality Control Protocol for Sports Performance Infill as well as to include measures to help contain and minimise the migration of rubber crumb infill.

It should also be noted that alternative systems are likely to be much higher cost.

The FF in England has also agreed to fund a live test hub to research alternative systems and CFF will work closely with FF to benefit from the learning. Non-fill AGPs i.e. 4G pitch designs are improving but there remain concerns about meeting FIFA criteria re longevity and cost.

Going forward, CFF will also consider:

- requiring a change to specifications to include a shock-pad to help future proof pitches and reduce rubber crumb infill. This will demand an additional cost of £50-70k per pitch
- encouraging the use of alternative organic infills

- when it will no longer fund AGPs with Micro-plastics based on advice from the Football Foundation
- approaches to mitigate cost increases due to high levels of inflation i.e. 20% increases since Q1 2022 and the additional costs of new AGP designs ie use of shock pads. These approaches may include measures such as:
 - o reduced pitch sizes to 91 x 55m playing areas and removal of nice to have features
 - stricter regimes re maintenance and management of use i.e. with regards use of correct footwear – many 3Gs now have effective boot banks
 - o ensuring provision of LED lights particularly given concerns of the cost of utilities
 - stricter controls with regards to sinking funds i.e. evidence in Wales as well as a recent Football Foundation review of AGP operators has also noted significant shortfalls in replacement carpet sinking funds (41% of operators in England).

ANNEX B: COMMUNITY CLUB HOUSE/CHANGING GUIDANCE

General Design Guidance

Social and refreshment areas should be designed to create a friendly welcoming atmosphere, with the community 'space' designed to satisfy a variety of needs, including post-match entertainment, teaching and learning, volunteer education/pre-and post-match briefings, somewhere for waiting parents and siblings and suitable spaces for small community events such as yoga or other low-level physical activities.

The layout and design should be informed by the findings from the community and user consultation. The design should be fit for purpose for the host organisation/club, as well as its key partners which could include schools, disability groups and other users with quite specific needs.

The social space will be used, before, during and after sporting activities, perhaps for the selling of food and drinks. This will demand a small kitchenette with servery to the side of the hall, and perhaps also opening to the exterior of the building.

W-Fi to be introduced and available throughout the building and a simple Public Address (PA) system to be installed with the controls housed withing the kitchen area.

A small store room should be created off the hall space for the secure storage of tables and chairs.

Where appropriate, for senior league clubs, a social space could open to a small covered stand providing 100 seats and with views out over the pitch, subject to location and competitive licensing requirements for football competition. (N.B. Football Tier 3 requires a minimum of 100 covered seats; Tier 2 a minimum of 250 covered seats; and Tier 1 a minimum of 500 covered seats).

Accessible toilets will be required, in addition to those provided for players, with the number subject to Building Regulations requirements.

General Design Guidance for Changing Blocks/Rooms

Tips on creating environments that are inclusive and welcoming for all

Future designs should include branding and signage incorporating a diverse range of imagery i.e. females, males, people with disabilities, people from different black and ethnic communities. Ensure the access is visible, with well-lit and safe routes for pedestrians in the surrounding areas as well as close proximity to parking, all of which will contribute to the safety and confidence of existing users and newcomers alike.

Interior spaces should have good lighting, light walls and bright colour schemes.

Female friendly changing rooms should be located with separate access and privacy screens should protect the entry to changing rooms.

Individual shower cubicles with lockable doors or shower curtains and toilet cubicles with seated toilets and hygiene/sanitary products freely available are important for females with low confidence and body image concerns.

Baby change tables should be accessible for male and female spectators and players.

Separate and gender-neutral changing rooms should be designed for both male and female officials serving a mix of female and male referees and their assistants.

The facility should provide accessible toilets close to the building entry point.

Outline guidance for the development of new changing facilities

The following summary guidance can also be used as a performance specification for the upgrading of existing infrastructure. The brief is based on a two-team changing room model, but can be increased to meet the demands of more than one competitive fixture and also makes reference to the relationship with any proposed community space.

Total area of the General Arrangements for two changing room sized pavilion to be c265m² plus 10% circulation.

General Arrangements

The entrance should be clearly visible and should be emphasised by use of a canopy, striking colours or contrasting materials.

Accessibility

It will be important that suitable surfacing, markings, level routes, lighting and the location of accessible parking will be employed to enable everyone to be able to make use of the facility.

Views 'in and out'

Where glazing panels are used to provide views out across the playing areas, it will be important that consideration is given to these being protected by the use of secure roller shutters.

Main Entrance

The main entrance should be obvious and clearly defined, with consideration given to access at both the rear of the building and the front.

Players using any natural turf pitch should be provided with a dedicated way in and out of the changing rooms.

Where costs allow, a draft lobby should be included within the entrance area.

Building Regulations will require a minimum size of draft lobby for disabled persons' access.

Within the entrance area, clean tread mats should be provided to reduce the transfer of dirt and mud. The entrance to the changing rooms from the natural turf pitch should be provided with a boot changing/washing area.

Inside the entrance to the changing block there should be an accessible toilet suitable for all groups as well as serving parents/guardians and siblings.

Circulation

Any corridors within the building should be designed ideally to a width of 1800mm to allow wheelchair passing and also for players carrying bags etc.

Flow and safety/comfort for male and female mixed use should be reflected in the way layouts are planned.

Internal Surveillance

Good visibility of all circulation spaces must be provided to ensure the safety of all users particularly vulnerable groups, children and young people, females in a mixed gender environment.

Separation of clean and dirty zones

It is important that the circulation from the wet/muddy areas, such as changing rooms should be separate from circulation to social spaces, and any other accommodation provided within the building.

Doors

All internal circulation doors must satisfy current building regulations in respect of accessible sports facilities.

Changing rooms

Two changing rooms are to be provided that are suitable for both adult and young people – suitable for male and female sports participants.

The changing rooms should be large enough for each to accommodate up to 16 players and 3 coaches, together with a trainer/physiotherapist (football) and 25 players for rugby.

The minimum size of the changing area, excluding showers and toilets to be 1m² per person. This therefore requires a changing area of no less than 20m² per changing unit (football) and 29m² (rugby).

Natural ventilation to be provided by way of high level, opening, security windows.

Benches

The changing benches should be no less than 500x100mm spaces per player and the height should be no less than 480mm above finished floor level.

Lockers

Lockers can be considered for the secure storage of valuables, either within the changing rooms or in the public / general circulation areas.

If lockers are to be provided, they can be located outside of the changing rooms in an access corridor, such that the changing rooms could be used by other persons whilst play is in progress, if required.

General protection

Interlocking doors between changing rooms must be carefully managed and the areas must also be secure when considering the use of the changing rooms by children and young people or male as well as female players.

Toilets

Cubicle toilets should be provided and not urinals, such that the areas can be used by both male and female participants.

Officials

The facility should provide two additional changing rooms such that the match officials can be both male and female. This would mean that a changing room for three persons is to be provided, with an alternative accessible toilet/ changing room so that the needs of a mix of genders can be satisfied.

Showers

Each changing room requires a separate shower area with the entrance to be located as far as possible away from the changing room entrance and toilets, in order to minimise water migration.

One shower point for every four changing spaces – allow 2m² per shower point (1m² for showering/1m² for drying).

Cubicle shower areas with lockable doors or curtains should be considered to provide privacy for those that lack confidence/have body confidence issues. This will however demand a greater floor area.

All floors within the shower area to be laid to fall away from the shower room entrance, to assist drainage.

Raised thresholds to be avoided to allow for wheelchair access.

Self-closing/push button showers to be provided.

Floors in the shower areas should be tiled with a slip-resistant ceramic finish, laid to the required falls.

Shower area walls to be tiled.

The changing areas should be designed such that they can be used by both able-bodied and disabled people but one unisex changing room should be provided with an accessible shower and toilet.

Support services

In addition to the small store there is a need for a lockable cleaner's store to include a sink and space for cleaning equipment and products - complying with the Control of Substances Hazardous to Health (COSHH) requirements.

A plant room should be appropriately sized and located to accommodate incoming utilities, meters, plant, equipment and boilers, with its location designed to allow for maintenance vehicular access.

General finishes

All of the floor finishes should offer a durable, easy to clean surface – Altro or similar, with the walls to be of a fair-faced concrete block construction.

All suspended ceilings throughout the building to be moisture resistant.

Other, 'Fit for Future' considerations

As part of the feasibility consideration should be given to the value of technological and environmentally sustainable developments such as USB charging points; WiFi connectivity throughout; and solar panels; LED lights and EV charging points etc.

A Few Useful Links

The following three links will take you to more detailed specialist guidance should you wish to undertake further research. However, your architect/design teams/contractor will be familiar with specialist requirements and should be instructed to refer to professional design guidance to inform their work. It should also be noted that every circumstance is different and the Football Foundation and FA guidance in England refers to some grant processes, programmes and approaches that don't necessarily apply in Wales.

The Football Association of Wales' 'Environments: For Her', is a player led resource pack which outlines barriers and solutions to pave the way for the future of the female game in Wales. It promotes the importance of creating inclusive and positive spaces where women and girls can feel confident. The booklet is there to support clubs, schools, coaches, parents and facility providers with key hints, tips and methods to ensure every female across Wales can play football without fear and in a positive, inclusive environment:

http://contentfaw.aws-skybrid.co.uk/files/7716/5210/9484/A5 Environments For Her Digital-min.pdf

Football Foundation changing room and pavilion design guidance:

https://footballfoundation.org.uk/changing-pavilion-design-key-considerations

Football Association design guidance:

https://www.thefa.com/-/media/cfa/durhamfa/files/facility-and-football-pitch-development/changing-rooms-info/ff-data-sheets changing-accommodation.ashx

ANNEX C: PITCHES AND CLUB DATA

				Carmarthenshire Sports Pitch / Football Facilities Stocktake Review March 2023											
		Location Information	on_					User Information	<u>1</u>						
Region	Town/Area	Venue Name (The name the ground is generally known by)	Town/Village Name (nearest local community)	Current Club Base or Main User	Short Pile AGP	Full size 3G	Planned (PI)/ Potential (Po) Full sized 3G	Senior Grass Pitches in use/ booked by community clubs	Junior Grass Pitches in use/ booked by community clubs	Grass pitches not used	Rugby Pitches	Cricket Pitches	Pavilion/ Changing Room	Stadium' Ground	
	Swansea	Hendy Park	Hendy	Hendy RFC							2		у		
	Cross Hands/Llanelli	Pen Parc/Park Place	Tumble	Tumble RFC; Tumble Utd 10T				1	1		1		y Y	├	
	Cross Hands/Llanelli Cross Hands/Llanelli	Parc y Mynydd Mawr Cefneithen RFC	Tumble Cefneithin	Tumble Utd FC 10T 1L 5J Cefneithen RFC				1			1		y	 	
	Cross Hands/Llanelli	Neuadd y Gwendraeth	Drefach	Cemeliner Ki C				1	1		1		Y	 	
	Cross Hands/Llanelli	Drefach Welfare Club	Drefach	Drefach Ladies FC 6T; Drefach FC				1	-				v		
	Cross Hands/Llanelli	Drefach Cricket & FC	Drefach	Drefach FC 16 T J and Walking				1				1	У		
	Cross Hands/Llanelli	Ceneithen Park	Cefneithen					1							
	Cross Hands/Llanelli	Ysgol Gyfun Maes y Gwendraeth	Cefneithin	Drefach Ladies FC 6T		1		1	1				У		
South	Llanelli	Penygroes Park Pavilion	Penygroes	Penygroes RFC; Kruf FC1T'; Drefach FC				1	1		2		v		
	Llanelli	King Georg V Felinfoel Rec Grnd	Felinfoel	Felinfoel RFC ; Felinfoel AFC 2S				1	-		1	1	y		
	Llanelli	Calsonic Kansei Sports & Social Club	Felinfoel	Calsonic Kansei Swiss valley AFC				1					v		
	Llanelli	Dafen Park	Dafen	Dafen Welfare FC 9T	1			1				1	y		
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	Lianeili	3t John Lloyd Ne Fright School	Lianem		-								'		
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	Llanelli	Trallwm Park	Llanelli	Trallwm FC 2T				1					У		
	Llanelli	Bynea RFC	Bynea	Bynea RFC							2		У	↓	
	Llanelli	Tata Steel (Trostre)	Llanelli					1					У	 	
	Llanelli	Parc Y Scarlets	Llanelli	Scarlets Rugby		1					1		v	1	
	Llanelli	Stebonheath Park	Llanelli	Llanelli Town AFC15T incl Disability Vets Girls Ladies			PI	1					y	1	
	Llanelli	New Dock Stars RFC	Llanelli	New Dock Stars RFC							1		У		
	Llanelli	Coedcae School	Llanelli				Po	1	1				v		
	Llanelli	Penyfan Football Grnd	Llanelli				FU	1	1	1			У	+	
	Llanelli	Glanmorfa Park	Morfa	Bwlch Rangers FC 1T				1					Υ		
	Llanelli	Penrhos 3G	Seaside	Managed by Actif (multiple users)		1							Y		
	Llanelli	Seaside S&SC Crown Park	Seaside	Seaside FC 11T		1				3		1	y		
	Llanelli	Llanelli LC Field	Llanelli							1					
	Llanelli	King GV Fields, Pwll Park	Pwll	Pwll Athletic FC 2T				2				1	У		
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	Llanelli Llanelli	Coleg Sir Gâr Furnace Utd RFC	Llanelli Llanelli	Llanelli Town FC Furnace Utd RFC		1				1	2		y Y	 	
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	Pontyeberem	Bancffosfelen Park	Bancffosfelen	Bancffosfelen FC 2T									У	1	
	Pontyeberem	Pontyberem Park	Pontyberem	Pontyberem RFC; Bancffosfelen JFC 18T				1			1	1	У	 	
	Ponthenri	Ponthenri Recreation Ground	Pont Heri							1			У		
	Burry Port	Glan-y-Mor School	Burry Port				PI	1					У		
	Burry Port	Pembrey Country Park Memorial Park	Pembrey Burns Port				1	1			1				
	Burry Port Burry Port	Woodbrooke Lane	Burry Port Burry Port	Burry Port RFC; Burry Port AFC 7T Burry Port AFC 7T				1			1		У	 	
	Trimsaran	Trimsaran Park/Leisure Centre	Trimsaran	Trimsaran RFC				1		1	2		у	<u> </u>	
	Kidwelly	Carway Football and Cricket Club	Carway	THIIISAI AT NI C						1	-	1	, v		
	Kidwelly	Park Stephens	Kidwelly	Kidwelly Black Cats JFC 8T; Kidwelly Town FC 2T; Kidwell RFC; CC				1		_	1	1	у		
	Ferryside Ferryside RFC Ferryside Ferryside AFC 1							1			1	1	Υ		

		I		Carmarthenshire Sports Pitch / Football Facilities Stocktake Review March 2023											
		Location Informatio	<u>n</u>	Facility and User Information											
Region	Town/Area	Venue Name (The name the ground is generally known by)	Town/Village Name (nearest local community)	Current Club Base or Main User	Short Pile AGP	Full size 3G	Planned (PI)/ Potential (Po) Full sized 3G	Senior Grass Pitches in use/ booked by community clubs	Junior Grass Pitches in use/ booked by community clubs	Grass pitches not used	Rugby Pitches	Cricket Pitches	Pavilion/ Changing Room	Stadium' Ground	
	Ammanford	Maes Elwyn Playing Field	Brynamman						1						
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	Ammanford	Brynammon RFC	Brynammon	Brynamman RFC				-			1		Y		
	Ammanford	Betws Park	Ammanford	Betws RFC					1		1		У		
	Ammanford	Ysgol Dyffryn Aman/Amman Valley LC	Ammanford	Handah's DEC	1		PI	2			2		У		
	Ammanford Ammanford	Llandybie RFC Ammanford Recreation Ground	Ammanford	Llandybie RFC Ammanford AFC 28T ; Ammanford RFC		<u> </u>		2	1		2		v		
	Ammanford	Caerbryn Welfare Ground	Penygroes	Caerbryn AFC 2T				1	-				V		
	Ammanford	Parc Maimo / Pant y Ffynon Pitch	Pantyffynon	Pantyffynon RFC				1			1		У		
	Ammanford	Saron Juniors football pitch	Saron	Saron JFC				1							
	Ammanford	Tycroes RFC	Tycroes	Tycroes RFC							2		У		
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	North	Llangadog RFC	Llangadog	Llangadog RFC							1		y		
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	Llandovery	Castle Playing Fields	Llandovery	Llandovery Town JFC 5T;			PI	1				1	У		
	Llandovery	Llandovery RFC	Llandovery	Llandovery RFC							4		Υ		
	Llandovery	Ysgol Rhys Prichard Llandovery LC	Llandovery				No				1				
West	Carmarthen	Parc Myrddin	Carmarthen	FC Carmarthen 1T				1							
				Carmarthen Town AFC; Carmarthen Town Academy & various clubs access for training										1	
	Carmarthen Carmarthen	Richmond Park Abergwili Recreation Park	Carmarthen Abergwili	Carmarthen Quins RFC		1				1	3		y	1	
	Carmarthen	Abergwili AFC	Abergwili	Abergwili AFC 1T				1					, V		
	Carmarthen	Maridunum Playing Fields	Johnstown	Johnstown AFC 20T				2	1				ý		
	Carmarthen	Carmarthen Leisure Centre	Carmarthen	Various sports clubs (hockey, football)	1			1					Y		
	Carmarthen Carmarthen	Carmarthen Athletic Barn University of Wales Trinisty St David	Johnstown Johnstown	Carmarthen Ath RFC;		-	PI				1		y	1	
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	Carmarthen	Ysgol Bro Myrddin	Carmarthen				PI				3		ý		
	Porthyrhyd	Porthyrhyd Welfare Park	Porthyrhyd					1	1				У		
	St Clears	St Clears Community Fields St Clears Community Fields/Ysgol	St Clears					1	1						
	St Clears	Griffiths Jones	St Clears	St Clears RFC			No				2		v		
	St Clears	Laugharne Athletic Club	Laugharne	Laugharne RFC and Cricket Club							1	1	y		
	Pendine	Llanmiloe Playing Fields	Llanmiloe					2							
	Carmarthen	Ysgol Llansteffan	Llansteffan	Peniel JFC 10T - Juniors - cricket pitch has changing						1					
	Carmarthen Carmarthen	Bronwydd Playing Fields Llampumsaint Fields	Carmarthen Llampumsaint	rooms, not available to football Peniel JFC 10T - Juniors				1	1			1	у		
	Whitland	Whitland Cricket and RFC	Whitland	Whitland RFC				1			1	1	Y		
	Whitland	Ysgol Dyffryn Taff	Whitland				Po	1			2		y		
West	Whitland	Llanboidy Football Club	Llanboidy	Llanboidy FC 2T;				1	1				у		
	Whitland	Parc yr Owen	Whitland					1			1		У		
	North West	Ysgol Clydau	Tegryn	Boncath - Pembs? 5J						<u> </u>	-				
	Newcastle Emlyn Newcastle Emlyn	Newcastle Emlyn RFC Parc Emlyn	Newcastle Emlyn Newcastle Emlyn	Newcastle Emlyn RFC Newcastle Emlyn FC; senior & junior teams				1	1	-	2		У		
	Newcastle Emlyn	Ysgol Gyfyn Emlyn	Newcastle Emlyn	Treated Emily 11 C, Semon & Junior Ceans			No	1	-		2				
	North West	Pencader Park	Pencader	Pencader Utd AFC 1T; Pencader Juniors 5T				1					У		
	North East	Llanybydder Village Park	Llanybydder	Llanybydder AFC 4T				1	1				n		
	North East	Llanybydder RFC	Llanybydder	Llanybydder RFC							1		У		
	Llandysul	Cae Chwaraeon Saron	Saron	Parrod Pangors EC 2T and incipalmini to				1		1					
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				45 Football Clubs				1		1			1		
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28/4/24

ANNEX D: FOOTBALL PITCH DIMENSIONS AND WORLD RUGBY STANDARDS

11v11 Senior/Youth Matches	Different Levels of Football	Minimum Dimensions
Field of Play Width	Seniors Juniors Youth	45m
To the touch lines	Tier 2&3 Senior Men	62m
	Tier 1 Senior Women	
	Tier 1 Senior Men	68m (required)
		64m (in exceptions)
Field of Play Length	Senior Junior, Youth	90m
To the goal lines	Tier 2&3 Senior Men	98m
	Tier 1 Senior Women	
	Tier 1 Senior Men	105m(required)
		100m (in exceptions)
Run-offs from field of play i.e. touch lines/goal lines to obstructions		Industry standard 3m

Junior Mini Age Group Matches	Different Levels of Football	Dimensions
Field of Play Width	U6 & U7 4v4	20yds
To the touch lines	U8 & U9 5v5	25yds
	U10 & U11 7v7	40yds
	U12 & U13 9v9	44yds
		(54yds max)
Field of Play Length	U6 & U7 4v4	28yds
To the goal lines	U8 & U9 5v5	35 yds
	U10 & U11 7v7	44 yds
	U12 & U13 9v9	64yds

INDICATIVE GUIDANCE ON WORLD RUGBY 3G STANDARDS

Artificial Rugby Turf is the term used by World Rugby to describe artificial surfaces used in the game of Rugby Union. The cross section of the facilities construction is described as follows:

- Artificial Rugby Turf Pile;
- Performance infill (rubber);
- Stabilising infill (sand);
- Primary and secondary backing;
- Shockpad;
- Porous macadam layer;
- Constructed over stone base with appropriate drainage system below.

A 3G pitch can only be suitable for contact Rugby Union matches or training where the pitch has an up-to-date test certificate that demonstrates compliance with World Rugby Regulation 22. This test must be carried out by an accredited World Rugby test institute.

World Rugby Regulation 22 relates to the performance standard of the pitch and measures criteria such as head impact, skin friction, joint strengths and energy restitution. These tests reflect the characteristics of a good quality natural turf rugby pitch. The facility must past Regulation 22 on completion and the certificate must be renewed every 2 years.

AGP systems can be manufactured and installed to the meet the requirements of World Rugby, Rugby Football League (RFL) and International Football (FIFA). But if a pitch is certified by RFL/FIFA, this does not necessarily mean it meets World Rugby regulations.

ANNEX E: INDICATIVE DISTRIBUTION OF CLUBS, IN CATCHMENT CLUSTERS (30 MINUTE DRIVE TIME), FORMING RECOMMENDED AGP HUBS

													i			
						Cur	rent				Future					
Sport	Facility Mode	Club		Female Members	Totals Members		Youth teams	Potential Total Teams	Current Facility requirment (slots per team /half pitch per hour) Based on seniors training x2pw; Juns x1pw.	Club	Total Number of Teams (Existing+additional)	Future Facility requirment (slots per team /half pitch per hour)	Existing/PLanned Facilities	Ideal Catchment for 3G AGPs - Aspirational *NEW* Facility N.B. Full Size denotes 'Large', not necessarily top tier league compliant)	Comments & Priority ranking based on demand and potential impact (current club team numbers) and potential (target increase in teams)	
North	n West C	armarthenshire (Newo	astle Em	ılyn)												
Rugby		Newcastle Emlyn RFC	310	15	325	1	11	22	11	6	17	14				
Rugby		Llanybydder RFC	31	0	31	1	0	2	1	2	3	2			Location: 1st Option Secondary School Site, failing that NCE RFC	
Football	Level 2Mediur	Newcastle Emlyn FC	80	16	96	5		6	3	4	7	5		*NEW*		
Football	Level 2Mediur	Pencader Juniors FC	41	23	64	3		4	2	2	4	3		Full Size 3G		
Football	Level 3Small 1		36	15	51	2		3	2	2	4	3		ruii size su	F S	
Football	Level 3Small 1	Pencader United FC	28	0	28	2		2	1	2	3	2			,	
Football	Level 2Mediur	Bargod (Dre-fach Felindre)	83	0	83	6		6	3	4	7	5				
	Totals:	7			678			45	23	22	45	34				
West		henshire (Whitland)														
Rugby		St Clears RFC	188	6	194	1	9	13	6	4	10	8				
Rugby		Laugharne RFC	73	4	77	1	2	5	3	2	5	4		*NEW*	Location:	
Rugby		Whitland RFC	168	124	292	1	7	19	10	4	14	12		Full Size 3G	1st Option - School Site, Dyffryn Taf	
Football	Level 2Mediur	Llanboidy	61	0	61	4		4	2	2	4	3		_	7	
						<u> </u>										
	Totals:	4			624			42	21	12	33	27				

						Cur	rent				Future				
Sport	Facility Mode	Club	Male Members	Female Members	Totals Members	Senior teams	Youth teams	Potential Total Teams	Current Facility requirment (slots per team /half pitch per hour) Based on seniors training x2pw; Juns x1pw.	CIUD Tate: 0-5 toom clube+2	Total Number of Teams (Existing+additional)	Future Facility requirment (slots per team /half pitch per hour)	Existing/PLanned Facilities	IAcnirational *NFW* Facility	Comments & Priority ranking based on demand and potential impact (current club team numbers) and potential (target increase in teams)
Carm	arthen T	own West (Johnstown	1)												
Rugby		Carmarthen Athletic RFC	293	8	301	1	9	20	10	4	14	12	Existing Carmarthen Athletic Barn Small Rugby 3G		Smaller/performance focus / less community access
Football		Johnstown FC	245	124	369	16		25	12	6	18	15	, , , , , , , , , , , , , , , , , , ,		
Football		Llansteffan Football Club	32	0	32	2		2	1	2	3	2	Existing CLC Shortpile		
Hockey		Carmarthen Hockey Club						0	0		0	0			
Football		Carmarthen Stars AFC	181	79	260	12		17	9	6	15	12		*NEW*	Location :
Football	Level 2Mediu	Towy Tigers FC	91	3	94	6		6	3	4	7	5		Full Size 3G	Johnstown Fields USW/CLC 3
	Totals:	6		,	1056			70	35	22	57	46			
Corm	orthon T	own Centre													
			T	T		L	T	I	T.	-	T	T-	T	T	
Football	Level 1Large C	Carmarthen Town FC	161	27	188	11	-	13	6	6	12	9	5 tota 6 db 7 20		1122
Football	Level 2Mediu	FC Carmarthen	57	0	57	4		4	2	2	4	3	Existing Carmarthen Town 3G		N.B. Performance/academy focus/less community access
	Totals:	2			245			<mark>16</mark>	8	8	16	12			
Carm	arthen R	tural													
Rugby		Carmarthen RFC	258	19	277	1	11	18	9	6	15	12			Location :
Football	Level 2Mediu	Peniel Junior FC	129	13	142	9		9	5	4	9	7		*NEW*	Bro Myrddin Secondary School/ Smaller
Football	Level 3Small 1	Abergwili Football Club	31	0	31	2		2	1	2	3	2		Full Size 3G	need/impact but Secondary School need 10
	Totals:	3			<mark>450</mark>			30	15	12	27	21			

						Cur	rent				Future				
Sport	Facility Mode	e Club	Male Members	Female Members	Totals Members		Youth teams	Teams	Current Facility requirment (slots per team /half pitch per hour) Based on seniors training x2pw; Juns x1pw.	Club	Total Number of Teams (Existing+additional)	Future Facility requirment (slots per team /half pitch per hour)	Existing/PLanned Facilities	Ideal Catchment for 3G AGPs - Aspirational *NEW* Facility N.B. Full Size denotes 'Large', not necessarily top tier league compliant)	Comments & Priority ranking based on demand and potential impact (current club team numbers) and potential (target increase in teams)
Gwen	dreath '	Valley East													
Rugby		Cefneithin RFC	100	6	106	1	8	7	4	4	8	6			
Rugby		Tumble RFC	272	61	333	1	10	22	11	6	17	14	Existing Maes Y Gwendraeth		This would be about right as 'School/District
		Tumble FC				1	6	0	0		0	0	Existing Macs 1 Gwenardeth		association also use
Football		1 Drefach Women FC	0	47	47	0		3	2	2	4	3			
	Totals:	4			<mark>486</mark>			32	16	12	28	22			
Gwer	dreath '	Valley West													
	larcatii	Pontyberem RFC	176	Ic.	182	I ₁	lo	12	lc .	I ₄	10	lo		I	
Rugby Rugby		Pontyates RFC	81	21	102	1	4	7	3	2	5	4		*NEW*	Location :
Football	Level 1Large	C Bancffosfelen Junior FC	138	38	176	_	9	12	6	6	12	9	Existing Small Pontyberem	Full Size 3G	Pontyberem
Football		ır Bancffosfelen	57	0	57	4		4	2	2	4	3			9
	Totals:	4			517			34	17	14	31	24			
						Cur	rent				Future		1		
Carm	arthen E	Bay									1 0.00.10				
			371	29	400	1	10	27	13	6	19	16			Ysgol Glan Y Mor
Rugby		Burry Port RFC											Planned Glan Y Mor (Full Size		2
Football	Level 1Large	C Pembrey AFC	180	18	198	12		13	7	6	13	10			
Rugby		Kidwelly RFC	157	15	172	1	8	11	6	4	10	8			Location:
Rugby		Trimsaran RFC	69	10	79	1	4	5	3	2	5	4		*NEW*	Kidwelly
Football		ır Kidwelly Black Cats Junior FC	113	15	128	8		9	4	4	8	6		Full Size 3G	Riuwelly
Football		ır Kidwelly Town FC	58	0	58	4		4	2	2	4	3		I uli Size Su	To be reviewed after Glan Y Mor developmen
Football	Level 3Small	1 Ferryside AFC	33	0	33	2		2	1	2	3	2			To be reviewed after diali i mor developmen
	Totals:	7			1068			71	36	26	62	49			

Carmarthenshire Pitch Sports Facilities and Clubs Vision and Plan April 2024

						Cur	ront				Euturo				
						Cur	rent				Future				
Sport	Facility Mode	Club	Male Members	Female Members	Totals Members	Senior teams	Youth teams	Teams	Current Facility requirment (slots per team /half pitch per hour) Based on seniors training x2pw; Juns x1pw.	Additional Number of teams based on size of club Tgts: 0-5 team clubs+2 teams; 6-10 team clubs +4 teams; >11 teams +6 teams.	Total Number of Teams (Existing+additional)	Future Facility requirment (slots per team /half pitch per hour)	Existing/PLanned Facilities	Ideal Catchment for 3G AGPs - Aspirational *NEW* Facility N.B. Full Size denotes 'Large', not necessarily top tier league compliant)	Comments & Priority ranking based on demand and potential impact (current club team numbers) and potential (target increase in teams)
Llane	lli East														
Rugby		Llangennech RFC	352	13	365	1	10	24	12	6	18	15			Location:
Football	Level 1Large C	Llangennech FC	310	89	399	3	21	27	13	6	19	16		*NEW* Full Size 3G	1st Option Llangennech RFC/ partnership with nearby School Site
Rugby		Yr Hendy RFC	73	4	77	1	4	5	3	4	7	5		ruli Size SG	1
Rugby		Bynea RFC	141	21	162	1	6	11	5	4	9	7			•
Football		Trallwm AFC	67	0	67	4		4	2	2	4	3	Existing Gen 2 at St John Lloyds		
Football	Level 1Large C	Dafen Welfare FC	172	4	176	11		12	6	6	12	9	existing Gen 2 at St John Lloyds		
Hockey		Llanelli Hockey (Juniors)							0						
	Totals:	7			1246			83	42	28	70	56			
Llane	lli Urban														
Rugby		Llanelli Warriors	33	0	33	1	0	2	1	2	3	2	Existing Parc Y Scalets Indoor		Smaller/performance focus / less community
		Llanelli Scarlets/Academies				8		0	0		0	0	Existing Fare F Searces mason		access
Rugby		Felinfoel RFC	248	12	260	1	8	17	9	4	13	11			Location:
Football	Ü	Calsonic Kansei Swiss Valley AFC	263	100	363	18		24	12	6	18	15	Planned Bryngwyn		Ysgol Bryngwyn
Football		Felinfoel AFC	53	0	53	4		4	2	2	4	3			6
	Totals:	3			676			<mark>45</mark>	23	12	35	29			
Hano	lli Town	Contro													
			1-	1	T	1-	1.	1-	Ι.	T.	-	T-	1	T	
Rugby		Stradey Sospans Female Hub	0	131	131	0	4	9	4	4	8	6	No. and Conden		Location:
			194	71	265	13		18	9	Ь	15	12	Planned Coedcae Not Sull Sized (65x55m)		Ysgol Coedcae - Not Sull Sized (65x55m) Lower Community Need
Football		Camford Sports FC													11
	Totals:	2			<mark>396</mark>			<mark>26</mark>	13	10	23	18			
Hane	lli South														
Rugby		New Dock Stars RFC	137	4	141	T ₁	13	Iq.	5	12	17	16		I	
Football		Llanelli Town	126	34	160	8		11	5	6	11	8			
r ootbuii	ECVCI ILLUIGO C	Bwlch Rangers	120	5.	100	2		0	0	0	0	0	Existing Penrhos		
Football		Evans and Wiliams			200	1	11	13	7	6	13	10			
Football	Level 2Mediur	West End United	61	0	61	4		4	2	2	4	3			
	Totals:	5			562			37	19	16	35	27			
	lli West														
Football	Level 3Small 1	Furnace United RFC	43	0	43	3	ļ	3	1	2	3	2			
Rugby		Use all Wardens BEC	81	0	81	1	10	5	3	b	9	b	Existing Coleg Sir Gar		
Rugby Football	Level 1Large C	Llanelli Wanderers RFC	240 193	3b	276 195	1 13	b	18 13	7	4 c	13	10			
rootball	Totals:		133	<u> </u> 4	595	113	<u> </u>	40	20	18	38	29		I .	
	i Utais.	3			033			.5							

Carmarthenshire Pitch Sports Facilities and Clubs Vision and Plan April 2024

Sport	Facility Mode	e Club	Male Members	Female Members	Totals Members	Senior teams	Youth teams	Potential Total Teams	Current Facility requirment (slots per team /haif pitch per hour) Based on seniors training x2pw; Juns x1pw.	Additional Number of teams based on size of club Tgts: 0-5 team clubs+2 teams; 6-10 team clubs+4 teams; >11 teams+6 teams.	Total Number of Teams (Existing+additional)	Future Facility requirment (slots per team /half pitch per hour)	Existing/PLanned Facilities	Ideal Catchment for 3G AGPs - Aspirational *NEW* Facility N.B. Full Size denotes 'Large', not necessarily top tier league compliant)	Comments & Priority ranking based on demand and potential impact (current club team numbers) and potential (target increase in teams)
Amm	an Valle	2 V													
Football	Level 3Small 1	1 Caerbryn	51	lo	51	3	l	3	2	2	4	3			
Football		Ir Saron Juniors	108	8	116	7		8	4	4	8	6	Ammanford LC Shortpile		
Football	Level 1Large C	Cwmamman United AFC	211	3	214	14		14	7	6	13	10	•		
Rugby		Pantyffynon RFC	14	2	16	1	0	1	1	2	3	2			
Rugby		Tycroes RFC	165	17	182	1	6	12	6	4	10	8			
Rugby		Penybanc RFC	229	11	240	1	9	16	FALSE	4	4	2	A		
Rugby		Penygroes RFC	22	0	22	1	0	1	1	2	3	2	Ammanford Leisure Centre 3G		
Rugby		Betws RFC	45	1	46	1	0	3	2	2	4	3			
Rugby		Llandybie RFC	56	0	56	1	0	4	2	2	4	3			
	Totals:	9			943			63	23	28	51	37			
		91													
Amm	anford T	Town													
Rugby	1	Ammanford RFC	234	21	255	T ₁	l- ₂	17	lo.	I _A	13	11		1	Location:
Rugby		Allillalliord RFC	288	193	481	19	/	32	16	4 c	22	19		*NEW*	Ammanford Rec - High Club/Team demand
Football	Lavel 11 area (QAmmanford AFC	200	193	461	19		32	16	0	22	19		Full Size 3G	despite new LC 3G
rootball	Totals:				736			49	25	10	35	30			4
	_														
Uppe		n Valley													
Rugby		Brynamman RFC	115	10	125	1	7	8	4	4	8	6	Y Bedol Small 3G		
Rugby		Amman United RFC	118	5	123	1	4	8	4	2	6	5	1 Seder Sinding Se		
	Totals:	: <mark>2</mark>			248			17	8	6	14	11			
Dinef	wr Valle	ev .													
Rugby		Llangaddog	36	10	36	lı .	lo .	la .	1,	I.	In .	I-			
		. 30		1-					11	12	3	2	Existing 3G Bro Dinetwr needs		
Rugby	1		131	18		1	5	10	4	4	8	6	Existing 3G Bro Dinefwr needs floodlights and community		Investment a priority to enable full community
	1	Nantgaredig RFC	131	18	149	1	5	10	4	4		6	floodlights and community		Investment a priority to enable full community use
	Level 1Large C	Nantgaredig RFC		18	149	1	5		4	4	8	6			
Football Football		CLIandeilo Juniors	153		149 167	10 6	5	10 11 6	10 6	6 4		6 13 8	floodlights and community access		
Football	Level 2Mediu				149	1 10 6 5	5		10 6 5	6 4 2	8 16	13 8 6	floodlights and community		
Football Football	Level 2Mediu	C Llandeilo Juniors Ir Llandeilo Town AFC Ir Llandovery Junior FC	153 85		149 167 85	1 10 6 5	5		10 6 5	6 4 2	8 16 10	13 8 6	floodlights and community access		
Football Football	Level 2Medius Level 2Medius	C Llandeilo Juniors Ju Llandeilo Town AFC Ju Llandovery Junior FC Teigrod Tywi	153 85		149 167 85 77	1 10 6 5	5	11 6 5 0	6 5	4 6 4 2	16 10 7	8	floodlights and community access		
Football Football	Level 2Mediu	C Llandeilo Juniors Ju Llandeilo Town AFC Ju Llandovery Junior FC Teigrod Tywi	153 85		149 167 85	10 6 5	5	11 6 5	6 5	2 4 6 4 2 2	16 10 7	6 13 8 6	floodlights and community access		
Football Football Football Hockey	Level 2Medium Level 2Medium Totals:	Llandeilo Juniors Llandeilo Town AFC ullandovery Junior FC Teigrod Tywi	153 85 71		149 167 85 77	1 10 6 5	5	11 6 5	6 5	4 6 4 2	16 10 7	8	floodlights and community access		
Football Football Football Hockey	Level 2Medium Level 2Medium Totals:	Quandeilo Juniors Ulandeilo Town AFC Ulandovery Junior FC Teigrod Tywi 6 armarthenshire (Lland	153 85 71	14 0 6	149 167 85 77 514	1 10 6 5	5	11 6 5	6 5	4 6 4 2	16 10 7	8	floodlights and community access		
Football Football Football Hockey	Level 2Medium Level 2Medium Totals:	Llandeilo Juniors Llandeilo Town AFC ullandovery Junior FC Teigrod Tywi	153 85 71 lovery)		149 167 85 77 514	10 6 5 5	5	11 6 5	6 5	4 6 4 2	16 10 7	8	floodlights and community access		use
Football Football Football Hockey	Level 2Medium Level 2Medium Totals:	Quandeilo Juniors Ulandeilo Town AFC Ulandovery Junior FC Teigrod Tywi 6 armarthenshire (Lland	153 85 71	14 0 6	149 167 85 77 514	1 10 6 5	8 0	11 6 5	6 5	4 6 4 2	16 10 7	8	floodlights and community access Existing Shortpile Tregib		use 12 Lower community need but identified as a WRU
Football Football Football Hockey	Level 2Medium Level 2Medium Totals:	Quandeilo Juniors ul Landeilo Town AFC in Landovery Junior FC Teigrod Tywi 6 armarthenshire (Lland Uandovery RFC	153 85 71 lovery)	14 0 6	149 167 85 77 514	1 10 6 5 5	8 0	11 6 5	6 5	4 6 4 2	16 10 7	8	floodlights and community access Existing Shortpile Tregib		use 12 Lower community need but identified as a WRU strategic priority with College for player
Football Football Football Hockey	Level 2Mediui Level 2Mediui Totals:	Quandeilo Juniors Ulandeilo Town AFC Ulandovery Junior FC Teigrod Tywi 6 armarthenshire (Lland Ulandovery RFC Ulangaddog	153 85 71 Overy) 141 36	14 0 6	149 167 85 77 514 159 36	1 10 6 5 5 1 1 1 1 1 1	8 0	11 6 5	6 5	4 6 4 2	8 16 10 7 7 43 9 3	8	floodlights and community access Existing Shortpile Tregib		use 12 Lower community need but identified as a WRU
Football Football Football Hockey	Level 2Mediui Level 2Mediui Totals:	Ulandeilo Juniors Ulandeilo Town AFC Ulandovery Junior FC Teigrod Tywi 6 Brmarthenshire (Lland Ulandovery RFC Ulangaddog Ulandovery Junior FC	153 85 71 lovery)	14 0 6	149 167 85 77 514	1 10 6 5 5 1 1 1	8 0	11 6 5 5 0 0 34 11 2 2 5 5	6 5	4 6 4 2	8 16 10 7 43 9 3	8	floodlights and community access Existing Shortpile Tregib		use 12 Lower community need but identified as a WRU strategic priority with College for player

Appendix 6

The Council's Public Open Space Assessment Technical Report (January 2024) sirgar.llyw.cymru carmarthenshire.gov.wales

Revised 2018-2033 Local Development Plan

Public Open Space Assessment Technical Report



Mae'r ddogfen yma hefyd ar gael yn Gymraeg
This document is also available in Welsh
Cyflwynir elfennau wedi'u mapio a gynhyrchwyd o'r asesiad hwn ar Fap Cynigion a Mapiau Mewnosod yr

Mapped elements produced from this assessment

are presented on the **Second Revised LDP Proposal**

Ail Gynllun Datblygu Lleol Diwygiedig

Map and Insets Maps

Contents

1.	Inti	roduction	5
	1.1.	Purpose of this Public Open Space Assessment	6
	1.2.	Defining 'Open Space'	8
	1.3.	Open Space Topology	9
2.	Ме	thodologythodology	.11
	2.1.	Spatial Scope of Analysis	.12
	2.2.	Database Collation	.12
	2.3.	Demographic Data	.13
	2.4.	Determining Accessibility	.14
	2.5.	Quality	.15
	2.6.	Thresholds	.16
	2.7.	Additional Considerations	.16
3.	Ide	ntifying Local Needs	.18
	3.1.	Strategic Framework	.18
	3.2.	Rights of Way Improvement Plan (ROWIP)	.23
	3.3.	National Survey for Wales (Outdoor Recreation)	.25
	3.4.	Welsh Index of Multiple Deprivation	.27
	3.5.	Play Sufficiency	.28
	3.6.	Growing Food	.30
	3.7.	Greenspace Assessment	.31
	3.8.	SPG: Leisure & Open Space	.32
	3.9.	Demographics	.32
4.	Au	dit Existing Provision	.35
	4.1.		
	4.2.	Accessible Natural Green Space	.35
	4.3.	Play Space	.37
	4.4.	Outdoor Sports	.38
	4.5.	Formal Amenity	.40

2nd Deposit rLDP

	4.6.	Quality	43
5.	Ве	enchmark Standards	44
	5.1.	Charter for Open Spaces in Wales	44
	5.2.	Accessible Natural Green Space	44
	5.3.	Play Space	45
	5.4.	Formal Amenity Space	46
	5.5.	Allotments	47
	5.6.	Open Space Standards Tested	48
	Pr	ovision Quantity	49
	Pr	ovision Accessibility	50
6.	Re	esults	51
	6.1.	Standard 1	51
	6.2.	Standard 2	59
	6.3.	Standard 3	60
	6.4.	Standard 4	60
7.	Re	ecommendations	62
	7.1.	Open Space Policy	62
	7.2.	Site Assessment (LDP Allocations)	64
	7.3.	Devising Local Open Space Standards	72
8.	Co	onclusion	74
Αį	pen	idices	75
	Ap	ppendix A: Background Policy & Strategic Framework	75
	Ap	ppendix B: Sources and Attribution Statements	82

Abbreviations

(r)LDP	(revised) Local Development Plan (also referred to as the 'Plan')
ANGS	Accessible Natural Green Space
BBNP	Bannau Brycheiniog National Park
CCC	Carmarthenshire County Council (unitary area referred to as 'County')
CRoW	Countryside and Rights of Way Act 2000
ED	Electoral Wards (also referred to as 'Ward')
FA	Formal Amenity
FIT	Fields in Trust
GBI	Green and Blue Infrastructure
ISA	Integrated Sustainability Appraisal
LA(s)	Local Authorit(y/ies)
LNR(s)	Local Nature Reserve(s)
LPA(s)	Local Planning Authorit(y/ies)
NNR(s)	National Nature Reserve(s)
NRW	Natural Resources Wales
ONS	Office for National Statistics
os	Ordinance Survey
(P)OSA	(Public) Open Space Assessment
PPW	Planning Policy Wales
PROW	Public Rights of Way
PS	Play Space (syn. Provision for Children & Young People)
TAN	Technical Advice Note
os	Outdoor Sports
ROWIP	Rights of Way Improvement Plan
SAM	Site Assessment Methodology
SPG	Supplementary Planning Guidance
SuDS	Sustainable Drainage Systems
WIMD	Welsh Index of Multiple Deprivation

1. Introduction

Open spaces are vital for health, well-being, and amenity, contributing to a vital part of the landscape of Carmarthenshire and the relationship both residents and visitors have with it. They can provide a valued place for play and physical activity, often in the presence of nature¹. Integrated networks of open space can also promote nature conservation and, as inherent parts of Green and Blue Infrastructure (GBI), can play an important role in promoting climate resilience and reversing biodiversity decline². Additionally, by providing a place for social and human-nature interaction, these areas can further develop a person's sense of *cynefin*³ whilst embedding the principles of placemaking.

As outlined in the *Planning (Wales) Act 2015*⁴, Local Development Plans (LDPs) and Local Planning Authorities (LPAs) must promote sustainable development in accordance with the *Well-being of Future Generations Act 2015*⁵ (WBFGA), for the purpose of ensuring that the development and use of land contributes to improving the economic, social, environmental, and cultural well-being of Wales. Through their appropriate integration into the urban fabric and our rural communities, open spaces can help ensure the attainment of WBFGA goals whilst delivering interrelated objectives of the Local Public Services Board⁶, Public Health Wales⁷, Nature Resources Wales' (NRW) Area Statements⁸, and Carmarthenshire County Council (CCC)⁹.

Planning Policy Wales (PPW)¹⁰ requires LPAs to provide a framework for well-located recreational and leisure facilities, and to develop clear policies for the provision, protection and enhancement of sport, recreation, and leisure facilities. These policies should set standards of provision, so that local deficiencies can be identified and met through the planning process, and to avoid/resolve conflict between interests. Both formal and informal open and green spaces should be protected from development, especially when there are multifunctional and provide benefits to the surrounding community.

Open Space Assessment

¹ The effects of green space on health, well-being, and social safety have been well studied (e.g., Groenewegen *et al.*, 2006; Pretty *et al.*, 2007; Irvine *et al.*, 2013; Jimenez, *et al.*, 2021).

² Carmarthenshire County Council has declared both a Climate and Nature Emergency and is committed to resolving the fundamental issues driving these.

³ "Cynefin" is a Welsh word meaning 'the place where we feel we belong, where the people and landscape around us are familiar, and the sights and sounds are reassuringly recognisable.'

⁴ Planning (Wales) Act 2015

⁵ Well-being of Future Generations (Wales) Act 2015

⁶ Carmarthenshire Well-being Plan (2018) sets four themes of Healthy Habits, Early Intervention, Strong Connections, and Prosperous People and Places – of which open space is related to.

⁷ Creating Healthier Places & Spaces for our Present & Future Generations' identifies walking, cycling, open spaces, and GBI as areas which can positively impact on health and well-being.

⁸ NRW - South West Wales Area Statement

⁹ Well-being objectives set out in the <u>Corporate Strategy 2018-2023 (Updated April 2021)</u>, priority projects in <u>Moving Forward in Carmarthenshire</u>, and ambitions set out in the <u>Cabinet Vision Statement (2022-2027)</u>.

¹⁰ Planning Policy Wales - Edition 11

1.1. Purpose of this Public Open Space Assessment

It is proposed that the requirements set out in PPW can be achieved through undertaking an audit of current provisions alongside an assessment of existing and the likely future open space need. Together, these tasks form the Public Open Space Assessment (POSA) which shall be used to inform the preparation and implementation of CCC's 2nd Deposit revised Local Development Plan (rLDP) (2018-2033), and will be a key component of its evidence base. The results will be used to inform appropriate rLDP policies which will help protect and secure open space resources for local communities, subject to adoption. The information obtained from this present assessment may also be useful for the preparation and development of other land-use strategies in which broader environmental, economic, social, and health and wellbeing issues are addressed within the County.

PPW does not prescribe standards for open space provision. Therefore, as later determined within Chapter 5, the present assessment has utilised widely acknowledged standards to holistically consider open space need with respect to the local context and existing landscape features. These have been decided in reference to the local context of the County and the social challenges currently experienced¹¹, alongside those recommended by invested stakeholders (e.g., Sports Council for Wales, NRW, Fields in Trust) and the approach taken by other Local Authorities (LAs).

Within Wales, open space planning policy is set out in *TAN16: Sport, Recreation, and Open Space* ¹². This document has been referred upon throughout the development of the present report, including the formulation of standards in which TAN16 recommends. This report supersedes a previous OSA which was originally published in January 2020. Those contextual changes which have occurred since this initial publication, and are addressed within this present assessment, include:

- rLDP Delays Due to unforeseen circumstances, the 1st Deposit rLDP was reacted from continuing on to examination, chiefly in response to the findings of NRW's Compliance Assessment of Welsh River Special Areas of Conservation Against Phosphorus Targets¹³. On the 9th of March 2022, Council agreed to the Revised Delivery Agreement to allow the preparation of a 2nd Deposit rLDP. This provided time to address the phosphate issue, and further allowed for the reflection and response to Covid-19 recovery, decarbonisation agenda, nature emergency, TAN15, and Future Wales 2040.
- Wards Historically, the county has been made up of 58 electoral wards. However, following a significant review of electoral boundaries conducted by the Boundary

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¹¹ Reference is made to the Carmarthenshire Play Sufficiency Assessment, Carmarthenshire Family Support Strategy 2018-23, Integrated Sustainability Appraisal Report of the rLDP, and previous OSAs.

¹² TAN16: Sport, Recreation, and Open Space (gov.wales)

¹³ Natural Resources Wales / Compliance Assessment of Welsh River SACs Against Phosphorus Targets

2nd Deposit rLDP

Commission for Wales, from May 2022 the county now consists of 51 wards. In addition to some naming alterations, no changes occurred to 34 wards.

- Census 2021 data on the population and households in Wales from Census 2021 has since been published. In Carmarthenshire, the population size has increased by 2.2%, from around 183,800 in 2011 to 187,900 in 2021. For note, the previous OSA utilised the 'mid-year 2017' estimated population dataset from the Annual Monitoring Survey.
- Housing figures as stated in the 1st Deposit rLDP, "to ensure the overall housing requirement of 8,835 homes for the plan period is met, provision is made for 10,160 new homes in accordance with the settlement framework" (SP3). Within the 2nd Deposit rLDP, this figure has been updated to an "overall housing requirement of 8,822 homes…" with a "provision… made for 9,704 new homes" (SP4). Whilst the overall strategic spatial option (i.e., a hybrid approach) remains the same, further alterations to allocation situation have also occurred due to a variety of factors including viability.

1.2. Defining 'Open Space'

There is no universal definition of open space in respect of classification, size, or description. As stated within TAN16 ¹⁴, "Open space is defined in the Town and Country Planning Act 1990 as land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground. For the purposes of this guidance, open space should be regarded as all open space of public value, including not just land, but also areas of water such as rivers, canals, lakes, and reservoirs which offer important opportunities for sport, recreation, and tourism, and can also act as a visual amenity, and may have conservation and biodiversity importance.". The Open Spaces Act 1906 refers to open space more broadly as "any land, whether enclosed or not, on which there are no buildings or of which not more than one-twentieth part is covered with buildings, and the whole or the remainder of which is laid out as a garden or is used for purposes of recreation, or lies waste and unoccupied".

For the purposes of the present assessment, open space is considered closely in line with TAN16. Nevertheless, it must also be accessible without financial restrictions for members of the public to access (on-foot) and enjoy the primary purpose of the site from which the recreation/amenity benefit is provided. This is to ensure that those experiencing socioeconomic disadvantage¹⁵ have the same opportunity as those who are not.

With consideration of the above, the following delineation is made:

- 1. Public Open Spaces (syn. Open Spaces) In line with the definition provided above, these are the primary focus of the present assessment and are what the Open Space standards are tested against. They include public parks, accessible greenspaces, and amenity provisions, and can either have statutory (e.g., common land) or non-statutory access (e.g., public body owned and/or access granted through formal agreement¹⁶). Those sites for which access is not formally secured (or is unknown) will not be considered Public Open Space.
- 2. Other Recreational Spaces (Limited Access) While in keeping with the definition in TAN16, a distinction is made within the present POSA. They include sites which charge a membership-fee (e.g., goal clubs), admission-fee (e.g., gardens), and those

¹⁴ Quote from Annex A, Page 30 – <u>TAN 16: Sport, Recreation, Open Space (gov.wales)</u> – as cited within paragraph 2.5 which states that 'Open space' is defined … as all open space of public value, including land, and water areas like rivers, canals, lakes, reservoirs and disused dock basins which offer opportunities for sport, recreation and tourism. The definition of "open spaces" for the purposes of the Local Government Act 1972 incorporates the definition in TAN16, based upon section 336(1) of the Town & Country Act 1990.

¹⁵ This is in keeping with the responsibilities embedded in Wales by the <u>Socio-economic Duty</u>. Additionally, within <u>CCC's Corporate Strategy</u>, this approach is considered consistent with the outcome of "*Families from disadvantaged backgrounds are able to access health and well-being provision within their local areas*". This issue is demonstrated the National Survey for Wales (2018-19) finding that 5% of responders who did not make any visits to the outdoors in the last 12 months, could not because they were unable to afford it (Table 6).

¹⁶ For instance, Woodland Trusts Access to Woodland Position Statement. Access should ideally be provided in perpetuity.

to which public access is (or could be) restricted (e.g., school facilities). In recognition of the continued role these spaces play within our communities, they will be included within the assessment's collated database for the purposes of auditing and additional interpretation however, these will not go towards calculating overall sufficiency against the devised standards.

1.3. Open Space Topology

As outlined in TAN16 ¹⁷, there are numerous open space topologies for which the POSA could consider. Table 1 presents those categories for which open space will be amalgamated and analysed, and how these relate to the typologies originally put forward in TAN16. Notes on their classification within the present POSA is also given. The consolidation of these topologies has been made in recognition of the multifunctionality which many of these open spaces provide.

¹⁷ See Annex B, Page 31 – TAN 16

Table 1. Categories and examples of open spaces, how they related to TAN16, and notes on their classification within the present POSA.

Category	Open Space Typology (TAN16)	Examples	Notes		
	Natural & Semi-Natural Greenspaces	Woodland, urban forestry, scrub, grasslands, open access land, wetlands, derelict open land, and coastal land.	ANGS must be freely and openly accessible, whether through CRoW, formal agreement (site restriction through at night gate closures, for instance, are disregarded). Protected/designated areas such as SSSIs and SACs with no public access are excluded. Green and blue infrastructure assets such as wetlands/rivers are also not included unless they complement a public rights of way or another accessible open space and are integral to perceived recreation/amenity benefit. There is no clearly established general right of public access to the foreshore for recreational purposes. In most		
Accessible Natural Green Space (ANGS)	Green Corridors	Accessible linear features (e.g., riverbanks, footpaths, cycleways, bridleways, disused railway land and rights of way) with a proportionate amount of continuous natural features such as hedgerows, meadow, scrub, and/or woodlands.			
	Areas of Countryside in the Urban Fringe	Areas which directly adjoin development limits.			
	Water	Accessible blue infrastructure features which provide amenity value (e.g., ponds, lakes, harbours).	instance beaches are, therefore, excluded (except for millennium coastal park).		
Outdoor Sports	Outdoor Sports Facilities	Tennis courts, bowling greens, sports pitches, golf courses, athletics tracks, school and other institutional playing fields, and other outdoor sports areas.	Outdoor sports facilities should only consist of the area and associated buildings that support the primarily function (e.g., sports bars are excluded). Only those sites and associated facilities routinely available to the public will be considered.		
Play Space	Provision for Children & Young People	Playing areas such as playgrounds, areas for wheeled play (i.e., skateboarding), and other less formal areas with provision (e.g., hangout shelters).	Typically, an equipped or informal area designated for playing.		
	Public Parks & Gardens	Urban/country/pocket parks, and open gardens.	The area considered must be outdoors (i.e., excluding		
	Allotments, Community Gardens & City Farms	Statutory allotments, temporary allotments, and community growing spaces including orchards.	associated buildings such as churches). Amenity Green Space does not consider road verges, although may include		
Formal Amenity Space	Amenity Green Space	Managed green features such as informal recreation spaces, village greens, and large accessible greenspaces around developments.	multifunctional spaces (e.g., SuDS) which are embedde within quality placemaking and design. Exclude private owned allotments.		
	Cemeteries & Churchyards	Including disused burial grounds.			
	Civic Space	Market squares, promenades, and other hard surfaced areas designed for pedestrians.			

Open Space Assessment Page 10 of 84

2. Methodology

This POSA adheres to several key stages which are broadly in alignment with the advice given within TAN16 (Table 2).

Table 2. POSA steps adapted from those outlined in paragraph 2.23 in TAN16 (page 11).

POSA Stage	Actions
Develop Methodology	 Review of existing guidance notes. Identify shortcomings of previous assessments.
Identify Local Needs	 Review existing policies, strategies, related assessments, and any relevant consultations with communities and stakeholders in both a local and Welsh context.
Audit Existing Provision	Define audit scope.Undertake data collation and discuss results.
Review of Open Space Standards	 Review current recommended and existing standards of quantity, accessibility, and quality. Set testable standards according to local context and review.
Results	 Identify surpluses/deficiencies in quantity and accessibility. Produce settlement maps to support the interpretation of results.
rLDP Recommendations	 Results to inform the assessment of allocations. Review of adopted LDP and 1st rLDP open space policies. Identify and evaluate strategic options.
Onward Monitoring & Implementation	 Adhere to the reporting framework included within the rLDP. If adopted, ensure standards are adhered to within the planning process. Review when appropriate.

POSA Page 11 of 84

2.1. Spatial Scope of Analysis

The present POSA covers the unitary authority area of CCC (hereinafter referred to as 'the County'), and does not consider the population/households within other neighbouring LPAs including those located within the area of Bannau Brycheiniog National Park (BBNP) within Carmarthenshire. Quantity of open space provision will be look at over a ward level (Figure 1), whereas accessibility will be reviewed on a ward, existing household, and allocation basis.

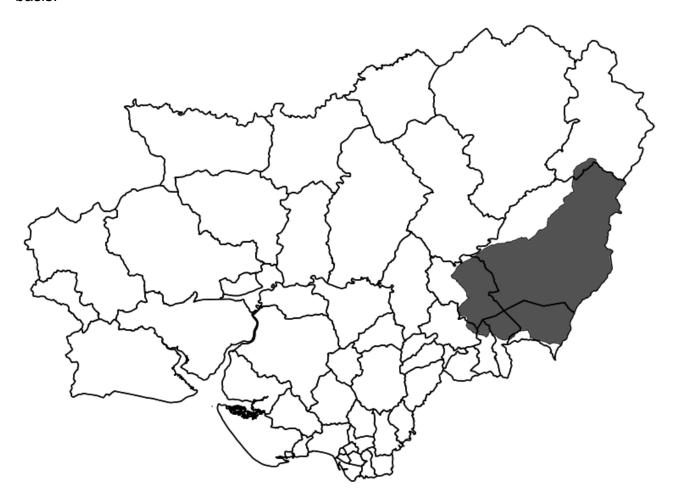


Figure 1. Map of the County depicting Electoral Wards. While within Carmarthenshire, the area shaded in grey is neighbouring BBNP and is excluded from the scope of this assessment.

It is recognised that residents may frequent open spaces outside of this area, particularly if living within settlements close to administrative borders. However, only open spaces which are within the County are included within this assessment, reflecting the LPAs own responsibilities and administrative duties.

2.2. Database Collation

All sites were examined, validated, and subsequently mapped with input from a range of CCC sections including Forward Planning, Leisure, Family Information Service, Childcare and Play Team, Estates, Rural Conservation, and Economic Development. Extensive ground truthing was not undertaken, although recent observations made during other

POSA Page 12 of 84

assessments (i.e., play sufficiency audit) did help to inform commentary supplied on a siteby-site and settlement basis, alongside comparison to recent aerial imagery.

Alongside ad-lib collaboration, staff input was substantially made during a series of interdepartmental workshops which resulted in the finalised Open Space dataset and the standards benchmarked. To be fully inclusive of all available information, a comprehensive range of datasets was used to determine each open space category (Table 3). Collectively, these were cross compared to those datasets complied for previously open space and GBI assessments to identify any outliers which required closer examination.

Table 3. Datasets used to inform each open space category. NB: Corresponding attribution statements were presented alongside all produced maps and are collectively presented in Appendix B, alongside references to all other data used.

Open Space Category	Dataset
Accessible Natural Green Space (ANGS)	Local Nature Reserves (LNRs) National Nature Reserves (NNRs) Regionally Important Geomorphological Sites (RIGS) Sites of Special Scientific Interest (SSSI) NRW Open Access - Dedicated Forest NRW Open Access - Open Country NRW Open Access - Registered Common Land NRW Open Access - Other Statutory Access Land
Play Space (PS)	2017/18 Aerial Mapping Playground Register (from CCC Play Sufficiency Officer) OS Greenspace mapping
Formal Amenity Space	Ordnance Survey Open Greenspace (April 2023) 2017/18 Aerial Mapping CADW Historic Parks and Gardens

All data was analysed and presented in QGIS 3.16.6. Datasets were merged according to the determined open space typologies (as set out in Table 1) and processed to indicate access and remove anomalies such as overlapping features, ensuring there were no duplicates nor double counting. Site boundaries were compared against recent arial imagery and, where deemed appropriate, edited to ensure the overall area of provision represented a more accurate picture of what is on the ground (i.e., boundaries were changed to remove buildings or other hard infrastructure not associated with the main recreation/amenity benefit obtained). This was also done in comparison with CCC land ownership data.

2.3. Demographic Data

Population statistics for each Electoral Ward within the County were obtained from the Office for National Statistics (ONS) Census 2021 data, as assisted by the Data Insight Team. The usual residential population figures were used to calculate the provision of open space hectarage per 1000 population for each ward, as per the benchmark standards outlined in Section 5.6, except for allotments which alternatively used number of households (in

POSA Page 13 of 84

alignment with the National Allotment Society's recommendations). Countywide provision was also calculated.

2.4. Determining Accessibility

An evidenced-based approach was used to determine the public accessibility of open space resources (in line with the definition of open space employed). Widely available datasets related to the Countryside and Rights of Way Act¹⁸ (e.g., Open Access Common Land) were used alongside those internally held. Information provided by Estates was also used to inform the leaseholder(s) of a site if recently underwent asset transfer. Additionally, a number of stakeholders were approached to determine whether assets were formally publicly accessible (if not held on CRoW/CCC databases).

Accessibility was assessed on a County-wide level by comparing buffer zone overlap with residential addresses indicated by the Local Land and Property Gazetteer. On an individual rLDP residential allocation basis, accessibility was assessed utilising those minimum distance standards outlined in Section 5.6¹⁹. Network analysis was conducted on the centroid point of the proposed development site, and iso-distance polygons based on the service network were then created to conduct spatial queries (i.e., determining any intersections with open space). This ensures access is more accurately represented for all dwellings within a given allocation, and not just those near the perimeter. Additionally, NRW states that an approach incorporating network techniques "offers (the) best analysis of greenspace provision"²⁰ (Figure 2). For wholeness, this information is presented alongside any quantity deficiencies and will, ultimately, be used as supporting information contained within the Site Assessment Methodology (SAM)²¹.

POSA Page 14 of 84

¹⁸ Countryside and Rights of Way Act 2000 (legislation.gov.uk)

¹⁹ The NRW Greenspace Toolkit states 400m if network analysis is being used. Page 28 states that "this takes into account the need for the walker to follow the road and footpath network to access greenspace, crossing streets and going round corners etc."

²⁰ NRW Greenspace Toolkit (Page 28).

²¹ Open Space is an allocation constrain and is considered within the rLDP <u>SAM</u>. Relating to Q7 (paragraph 4.20 – public open space must be considered) and Q14 (paragraph 4.28 – promoting Integrated Sustainability Appraisal (ISA) Objectives (i.e., ISA12: Health & Well-being, ISA15: Social Fabric)).



Figure 2. Service networks of 400m (yellow) and 1200m (orange) meters were created from the centroid point each allocation (black) to determine accessibility in accordance with the 2nd and 3rd standard outlined in section 5.6. In practice, those areas outside of the relevant zone identify deficiency in terms of access to existing open space provisions (as signified in purple). Example using SuV16/h1, Heol Llwynddewi.

Furthermore, interactive map assets were produced to indicate the service areas of each open space site (i.e., areas which meet accessibility standards) and, while not present within the report, are proposed to be implemented during the adoption of the rLDP to aid officer assessments.

2.5. Quality

No standards for the evaluation of provision quality have been incorporated as, in many instances, the determination of certain quality related aspects goes beyond the traditional scope of POSA (i.e., dedicated audits including those relating to health and safety may be required to be undertaken by open space providers). Nevertheless, information will be complied during the audit on a given sites protective legal status²² (implying provision safeguarded for future generations) and the obtainment of awards through schemes such as Green/Blue Flag²³ to signify open space quality. This was in addition to the supporting commentary contained within the recent Play Sufficiency assessment.

NB: The conclusion recommends that the assessment of quality and ground-truthing should be the next step in implementing this body of work.

POSA Page 15 of 84

²² Whether identified in previous LDP and/or other legally protection in perpetuity as identified by documents relating to asset transfer or held on FITS protected space record.

²³ Green Flag Award Scheme is an international standard for parks and green spaces operated by <u>Cadwch</u> Gymru'n Daclus (Keep Wales Tidy).

2.6. Thresholds

No minimum area threshold has been employed within this assessment given the distinguishing nature between the County's rurality and its dispersed urban areas. Despite there being some thresholds accompanying those standards reviewed in Chapter 5, this approach ensures that all open spaces of local value (whatever their size) are captured to ensure that these spaces can be duly considered. This is particularly applicable to those within smaller settlements²⁴ which may not necessarily be identified if a threshold were included. Nevertheless, those sites deemed not functional due to size and/or situation were excluded at the discretion of the assessor.

2.7. Additional Considerations

A pragmatic approach has been taken with regards to determining whether a site is considered an open space and whether access for residents is provided in line with the definition applied. Whilst every effort has been made to ensure quality assurance, some inaccuracies may remain given the scale, complexity, and constantly changing nature of open space provisions.

No direct comparisons with previous POSA findings can be made as assets such as golf courses and school playing fields (which are not freely and routinely accessible) are no longer considered. This is supplementary to those ward boundary changes.

It should also be noted that this assessment categorises open spaces based on their main function or derived benefit, without regard to the multi-functionality which many of these spaces have (or that fact that function/use is not always static and can change overtime). For example, amenity spaces can offer provision for children's play and, in turn, parks, play spaces and outdoor sports facilities could all be considered amenity spaces. For clarification, spaces have been categorised according to the relevant standards, available datasets, and local knowledge, however, the results should be viewed holistically, and further interrogation is required at a project level (particularly when determining the need for planning obligations of the assessed allocations). Nevertheless, the devised methodology ensures that sites are not counted in multiple open space categories and, therefore, the final provision quantity calculated is a valid reflection of what is on the ground (subject to the datasets used).

Those for-pay spaces (e.g., golf courses) are retained within the produced Open Space databased, although are excluded from the assessment against the standards and the overall calculation of total open space provision. It is recommended that the sufficiency and the local need for such sites should instead be contained within a comprehensive sport, leisure, and recreational study.

POSA Page 16 of 84

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²⁴ Especially Tiers 3 and 4 using the rLDP Settlement Framework.

Uncertainties and limitations of the present assessment include:

- The recommended open space standards (as later seen in Table 22) are developed as a proxy to ensure a variety of users with a range of needs, abilities, and interests can be duly met. However, as a high-level strategic assessment, it does not explicitly identify specific needs within a given settlement which vary on several factors including the transport network and resident demographics;
- In many existing urban areas, while it is possible to ascertain shortfalls in open space provision and identify specific accessibility needs (in line with the selected standards), it does not consider whether deficiencies can be appropriately met within that area (i.e., availability of land);
- The assessment of rLDP allocations considers the actual distance from door-to-gate
 accessibility and the provision of current access routes by utilising network analysis.
 Determining the centroid for each allocation is believed to represent access more
 proportionally for all dwellings, not just those on the perimeter. Other analysis such
 as buffer zones are likely to provide different results (and would be less reliable).
 Nevertheless, it does not consider whether these routes are actually suitable for
 pedestrians (and, therefore, further integration should be undertaken at a projectlevel):
- Provision of access points, adequate bike racks and parking and other transport infrastructure is not considered in line with current/future number of users;
- Demographic changes since the last census which took place on 21st March 2021;
- Changes to open spaces and/or their quality since the creation of the datasets/assessments ultilised;
- The effect of visitors and tourisms on open space provision. For instance, the quantity of open space provision may be regularly impacted by visitors, particularly within popular tourist areas;
- It does not consider the effects of employment nor employment allocations;
- It classifies children's play facilitates collectively (i.e., it does not individual identify those LAPs, LEAPs, and NEAPS as identified within FIT standards);
- Only open spaces which are within the County are included within this assessment.
 This particularly impacts those wards²⁵ which intersect CCC and BBNP LPA areas;
- Any further uncertainties outlined by any respective dataset authors.

POSA Page 17 of 84

²⁵ Electoral Wards of Llanboidy, Glanamman, Garnant, Llandeilo, Cwarter Bach, Llandovery, Llangadog, and Llandybie.

3. Identifying Local Needs

A comprehensive compilation of national, regional, and local background policy and strategic framework related to open space can be found in Appendix A. A non-exhaustive overview of the local strategic context, current policies, and future ambitions in relation to open space are summarised below.

3.1. Strategic Framework

Cabinet Vision Statement 2022–2027 (July 2022)

As well as tackling poverty and climate change, the Cabinet's vision statement includes strengthening the economy and increasing prosperity, and investing in housing, education, culture, infrastructure, and the environment to make a real difference to people's lives. The encompassing nature of open spaces means it can affect these aspects, however one priority of specific relevance includes:

"Recognise the needs of our diverse communities, ensuring that the right homes are built in the right places..."

This vision statement was presented at Cabinet by the Leader and informed the Corporate Strategy following public consultation.

CCC: Corporate Strategy 2022-2027

The Corporate Strategy sets out CCC's strategic priorities and aspirations, and outlines what it plans to do in order to achieve its vision for Carmarthenshire over the next five years. At the heart of this approach is integration and collaboration across the Council and with our stakeholders, and our focus going forward will be on *Developing Carmarthenshire*, *Together: One Council; One Vision; One Voice*.

It also sets out the Councils well-being objectives. Those which are deemed to have some significance to open space are individually discussed below, firstly covering why this objective is important locally, and those outcomes hoped for which open space provision has the capacity to impact upon:

1. Enabling our children and young people to have the best possible start in life (Start Well)

Giving every child the best start in life is crucial to reducing health inequalities across the life course. The foundations for virtually every aspect of human development – physical, intellectual, and emotional – are laid in early childhood. What happens during these early years, starting in the womb, has lifelong effects on many aspects of health and well-being –

POSA Page 18 of 84

from obesity, heart disease and mental health, to educational achievement and economic status (1)²⁶.

Carmarthenshire is the 5th worst county in Wales for levels of childhood obesity. In 2018/19, almost a third of children aged 4 to 5 were overweight or obese (6).

Children learn through play and develop essential skills - play sufficiency is essential (8).

Concern over mental health is a key issue raised by young people (14).

Outcome: Families from disadvantaged backgrounds are able to access health and well-being provision within their local areas.

2. Enabling our residents to live and age well (Live & Age Well)

Poverty and deprivation have serious detrimental effects, impacting all aspects of well-being. Over a third of our households continue to live in poverty (35.6%), a level which has increased by 0.9% over the last ten years. This translates to around 29,500 households, suggesting that almost 600 additional households have slipped below the income threshold over the last ten years. A large proportion of respondents to a recent consultation agreed that poverty is a problem in their respective area (1).

The challenge is to prevent ill health, living healthy lives allows people to fulfil their potential, meet educational aspirations and play a full part in the economy and society of Carmarthenshire, many of the preventive services and interventions lie outside health and social care (4).

Mental ill health is something that one in four adults will experience in the course of their lifetime. There was overall strong agreement from residents that it is important that consideration is given to supporting people's mental health and wellbeing (6).

Access to good quality, affordable homes promote improved health and well-being, meeting the individual needs of residents, building strong sustainable communities and places where people want to live. It is also good for the economy - in order to thrive, new businesses need easy access to its workforce and quality housing will help to attract this cohort. There was overall strong agreement from residents that it is important that local people are supported to buy homes locally (8)²⁷.

Outcome: Accessible, inclusive, sustainable services, which promote and facilitate learning, culture, heritage, information, well-being and leisure. Availability of good quality and energy efficient affordable homes in the County. Recognise and seek to limit the disproportionate barriers faced by marginalised groups in accessing services and support which allow them to live and age well.

POSA Page 19 of 84

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²⁶ Studies have demonstrated that open spaces are associated with better mental health, and benefits to the immune system and to metabolism, improved pregnancy outcomes, a reduction in cardiovascular disease, and reduced premature mortality.

²⁷ CCC is a signatory of the <u>Placemaking Charter for Wales</u> which promote principles centred around People and Community, Movement, Public Realm, Location, Mix, of uses, and Identity as aspects which support the development of sustainable high-quality homes. Open space has an inherent roles within these factors.

3. Enabling our communities and environment to be healthy, safe and prosperous (Prosperous Communities)

Access to services is a challenge in some instances owing to a lower population density and rurality. Large travel distances increase the time and cost for accessing services, which can hinder an individual's ability to feel connected to their communities, worsen isolation and reduce feelings of local pride and belonging. This is especially pertinent for marginalised groups. Findings from a recent Carmarthenshire residents survey highlights that whilst there was overall agreement from respondents that they can easily access services, a large proportion disagreed (6).

Areas of the county are susceptible to the negative effects of the climate emergency, especially flooding. Just over 15,000 properties (mostly residential) in the county are currently at some level of flood risk. 3,151 of these properties are at high risk. Climate change will increase the number of properties, infrastructure and key services at risk of flooding. Places which do not currently flood will become at risk of flooding and those already known to be at risk will see the level of that risk become greater The threats of the climate and nature emergencies were highlighted by residents as being a concern. Particular reference was made by some to the threats posed by flooding (8)²⁸.

A biodiverse natural environment is good for well-being, with healthy functioning ecosystems, supporting social, economic and ecological resilience. Planning plays an integral role in order to deliver the Council's vision (9)²⁹.

The latest Census data for 2021 indicates that Carmarthenshire is home to 72,838 Welsh speakers which translates to 39.9% of the county's total population. This figure has decreased by 5,210 since the last Census in 2011, which translates to a percentage point decrease of 4.0. This is the largest percentage point decrease of all local authorities in Wales. In 2001 and 2011, Carmarthenshire had the highest number of Welsh speakers of all local authorities in Wales, with 84,196 and 78,048 Welsh speakers respectively. These new figures mean that the county now has the second highest number of Welsh speakers of all local authorities in Wales and the fourth highest in terms of the percentage of the population that are able to speak Welsh. The county remains a key strategic stronghold for the future of the Welsh language and the social and economic benefits of bilingualism are widely recognised. Evidence gathered via the residents' survey indicates that overall respondents agreed that it is important that the Welsh language is promoted and protected. Evidence gathered via the residents' survey indicates that overall respondents agreed that it is important that the Welsh language is promoted and protected (11)³⁰.

Carmarthenshire exhibits increasing crime rates in some areas, however the county remains among the safest areas in the UK, with Carmarthenshire ranking 13th safest out of the 22

POSA Page 20 of 84

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²⁸ Quality open spaces are multifunctional, and incorporate flood alleviate measures such as SuDS.

²⁹ Green open spaces will have a significant role in this. Additionally, the requirement for developers to provide net benefits for biodiversity (<u>in line with PPW</u>) and be integrated into the requirement for open space provision. ³⁰ Heritage, identity, and culture are intrinsically linked to open space. Provisions leading to the encouragement of socialising, recreation and leisure will support the creation of a vibrant culture and opportunities for language transmission.

counties in Wales with a rate of 83.6 crimes per 1,000 population. Overall, there was agreement that residents feel safe in their communities (12)³¹.

Outcomes: People feel empowered to lead active and healthy lives through access to fit for purpose services and provision. Improve current and explore new developments to limit the effects of flooding and other environmental threats which affect our residents and service users. Sustain low crime rates whilst continuing effective partnership working to address increasing rates evident in some areas of the county. Increased confidence and use of Welsh as a thriving language.

Additionally, while not included above, open space acutely relates to all thematic priorities set under each of the discussed well-being objectives.

NRW Area Statement (2020)

Produced as a collaborative response to the Natural Resources Policy which was published by Welsh Government in 2017. Each Area Statement outlines the key challenges facing that locality, opportunities to meet those challenges, and how we can better manage our natural resources for the benefit of future generations. The themes for the marine area statement are building resilience of marine ecosystems; nature-based solutions and adaptation at the coast; and making the most of marine planning. The themes for South West Wales are reviewed individually below:

Reducing Health Inequalities.

NRW have identified three key topics related to this theme:

1. Open green spaces and urban green infrastructure

"There is a direct link between people's good health and being surrounded by the natural environment. Our green and blue spaces, including parks, open spaces, playing fields, woodlands, wetlands, road verges, rivers, canals, allotments and private gardens are often referred to as green infrastructure. This living network not only defines and shapes the character of a place but also delivers multiple benefits for biodiversity, health and well-being."

"By having an excellent living network in an urban area, it can help connect fragmented wildlife populations and habitats, linking urban areas with their surrounding environment. In other words, green infrastructure is good for people and for nature."

"Low-income areas are associated with lower quality housing and education, poor diet, and less access to good quality green space. Living near areas of greenspace (such as parks or woodland) can improve health, regardless of social class."

POSA Page 21 of 84

³¹ Open spaces have been shown to lead to lower crime rates.

"Urban trees are an important component of green infrastructure. Some towns in South West Wales have notably low levels of tree cover (including Port Talbot at 7.5% and Gorseinon, Haverfordwest, Carmarthen and Llanelli at around 11%). Additionally, tree cover is not evenly distributed in these areas with deprived areas tending to have lower cover."

2. Recreation activities and use of green and blue active travel

"The Active Travel (Wales) Act encourages more people to undertake regular journeys on foot and bicycle. Investment in an active travel infrastructure can result in significant economic benefits. The building of green active travel routes can result in multiple benefits for people and biodiversity."

"The Area Statement work so far has identified that giving people access to recreational trails, as well as green/blue travel routes is an important priority. This is something also identified through our Public Services Board engagement and local plans (e.g., Pembrokeshire Well-being Plan and Pembrokeshire Coast National Park Draft Management Plan) for South West Wales in both rural and urban locations."

"Outdoor recreation activities provide multiple benefits for people, the environment and the economy by encouraging environmentally friendly behaviours, contributing to health outcomes and through tourism. South West Wales has a lot to offer both in terms of locally accessible countryside and internationally renowned fisheries, mountain biking trails and bathing beaches."

"Given this provision, we would like to work collaboratively to support nature-based activities and make the outdoors more accessible to all."

3. Protecting the environment for our well-being

"Ensuring our natural resources are of high quality is key to our well-being. From the air we breathe and the waters we swim in, to managing the risk from the rivers and coast we live by, nature-based solutions can deliver multiple benefits for people and the environment. There is a strong connection between this topic and our land management theme. The coastal zone around South West Wales is hugely important to support tourism and industry as well as providing human health benefits. Within this area we have 40 designated bathing waters (33 'Excellent', 6 'Good' & 1 'Sufficient') which the tourism industry relies on for visitors."

Ensuring Sustainable Land Management.

The "challenges and opportunities from the Natural Resources Policy are addressed by this theme cover:

- How we maintain productive capacity of our land with a priority being improving soil quality and biosecurity;
- Improving the quality and quantity of our water;

POSA Page 22 of 84

- Increasing carbon stores in soils and biomass (plant or animal material) and ensuring areas are protected to do so;
- Reversing the decline in biodiversity;
- Reducing the risk of flooding;
- Supporting secure and stable employment.

Open space, particularly ANGS, has the capacity to address these challenges.

Reversing The Decline Of & Enhancing, Biodiversity.

The "challenges and opportunities from the Natural Resources Policy addressed by this theme include:

- o Reversing the decline in biodiversity and restoring resilient ecosystems;
- Responding to the climate change threat and adopting ecosystem approaches to help;
- Reducing noise pollution and pollution levels in our air, and enhance air quality;
- o Improving the quality and ensuring the quantity of our water.

Again, open space (particularly ANGS) has the capacity to address these challenges.

Mitigating & Adapting to a Changing Climate (Cross-Cutting Theme).

"In responding to this theme, we need to recognise these links and aim to deliver multiple benefits that help address climate change. For instance, increasing woodland cover next to a community not only enhances biodiversity, social health and well-being, but also enables trees to act as 'carbon sinks', soaking up excess water and reducing what's known as the 'urban heat island effect', something that occurs when an urban area becomes significantly warmer than surrounding areas due to human activity."

3.2. Rights of Way Improvement Plan (ROWIP)

Following the Countryside and Rights of Way (CRoW) Act 2000 all local highway authorities were required to publish a ROWIP covering all their area. The Act also imposed a duty on authorities to review their ROWIP every ten years.

Improvement plans are intended to be the prime means by which local highway authorities will identify the changes to be made in respect of the management and improvement of their local rights of way network to make better provision for walkers, cyclists, equestrians and for those who face barriers in accessing the countryside.

Public rights of way can provide valuable links within the local transport infrastructure, providing sustainable transport opportunities between communities, to places of work and to local amenities. They also play an essential part of rural tourism and have an important role to play in improving and sustaining health and well-being and in meeting the objectives outlined in the Well-being of Future Generations Act (2015).

All Public Rights of Way in Carmarthenshire (i.e., footpaths, bridleways, and byways) are recorded on the Definitive Map and Definitive Statement which is held in the Countryside Access office. The Public Rights of Way (PROW) network provides a valuable recreational resource for use by residents and visitors to Carmarthenshire alike. They provide unrivalled

POSA Page 23 of 84

access to the countryside and offer sustainable methods of travel by enabling safe use of alternative modes of transport to motor vehicles.

Table 3 provides details of the respective numbers and length of recorded routes in Carmarthenshire, being the third largest local authority network in Wales.

Table 3: Network Routes & Length (March 2018).

Route Type	Number of Routes	Length (km)
Footpath	2951	2198.0
Bridleway	136	164.8
Byway Open to All Traffic	88	77.9
Restricted Byway	1	1.6
Total	316	2442.4

CCC's statutory responsibilities in respect of the PROW network include:

- Signposting and waymarking of footpaths, bridleways, and byways;
- Keeping up to date the Definitive Map and Statement which is the legal record of PROW;
- Maintaining the surface of a PROW to a standard appropriate for the purpose for which it is used;
- Maintaining bridges over natural river courses;
- Keeping the PROW open and available by ensuring that other partners fulfil their responsibilities.

Countryside access opportunities offered by the PRoW network contribute towards health and well-being initiatives and improving quality of life for residents. As they are free to access and enjoy, they can also promote social inclusion. The network also plays a part in the economic development of Carmarthenshire through either direct or indirect spend in the County. Spending on tourism services, equipment, hospitality, travel, parking, and any number of other support services all contribute to the local economy.

In addition to the PRoW network there are other valuable opportunities to access the countryside such as:

- Open Access Land designated under the CRoW Act, consisting of open country such
 as mountains and moorland and 'registered common land'. There are approximately
 7600 hectares (ha.) of Open Access Land where the public have the right to roam on
 foot. This includes areas of 'dedicated open access land' where landowners allow
 free open access. An example is the WG who allow free open access to their
 woodland estate and in addition, also offers permissive access opportunities for
 mountain biking, horse riding and carriage driving;
- Unclassified Road Network amounting to approximately 170 Unclassified Roads (often referred to as "Green Lanes") with vehicular rights, totalling some 150

POSA Page 24 of 84

kilometres of largely unsurfaced routes, which play a significant role in the provision of recreational routes, for all users;

- Cycleways developed in response to the rapidly growing cycling market in Wales. Carmarthenshire has made significant developments in improving the opportunities for cyclists with the ambition to become the 'cycling hub of Wales'. The creation of numerous cycleways in the County which include the National Cycle Network and Safe Routes in the Community have also created opportunities for other users such as walkers, less able and disabled users and occasionally horse riders. Under the Active Travel Act (Wales) 2013 Carmarthenshire continues to identify and improve routes for cyclists and walkers to make active travel the most attractive option for shorter journeys and to connect key sites and communities;
- CCC Sites largely owned and managed by the Authority providing valuable recreational access, often to user groups with poorer provision in the wider countryside for example people with physical disabilities and horse riders;
- Coastal Access to the foreshore where public access rights exist. Beaches like Pembrey, Marros and Pendine are accessible for walking and very popular with horse riders. The nationally recognised Wales Coast Path, a linear route around the coast of Wales established between 2007 and 2012 which provides unrivalled access to the coastline of Carmarthenshire on foot, through a range of habitats and coastal landscapes;
- Permissive Access delivered in several ways, such as through Glastir Agri Environmental Funded Schemes, privately by individual landowners or over National Trust properties, primarily for walkers;
- Lost Ways are routes which carry public rights over them which were in existence before 1949 but are not currently recorded on the Definitive Map and Statement for Carmarthenshire.

3.3. National Survey for Wales (Outdoor Recreation)

Replacing the Welsh Outdoor Recreation Survey, the Outdoor Recreation section of the National Survey for Wales provides information on participation in a wide range of outdoor activities, from climbing to picnics, which take place in all areas from local parks to mountains and the sea. Several results have been extracted below from the <u>Results Viewer</u> which was last updated in December 2022. These are not exclusive of all those results with relation to sports and outdoor recreation.

With regards to outdoor recreation, Table 4 indicates that most children were found to spent time outside several times a week. However, 11% were found to have not spend times outdoors in the last month.

Table 4: National Survey for Wales, 2018-19. Sample size 2500.

How often child has spent time in green space or garden in last 4 weeks	%
More than once a day	19
Every day	23
Several times a week	31

POSA Page 25 of 84

Once a week	10
Once or twice in the last 4 weeks	6
Not at all	11

For general outdoor recreation (of all ages), Table 5 demonstrates that a wide range of areas are visited by those who undertake outdoor activities in the last year.

Table 5: 'Which of the following, if any, best describes the main type of place you visited on your most recent visit to the outdoors?' Asked of those who had undertaken outdoor activities at least once in last 12 months. National Survey for Wales, 2018-19. Sample size 4150.

Where visited	%
Local park or other local space	25
Beach, sea or coastline	19
Woodland or forest	17
Roadside pavement / track	14
Hills, mountains or moorland	7
River, lake or canal	6
Farmland	5
Other (please specify)	4
None of these	1

Nationally, physical disability appears to be the main why someone has not visited the outdoors in the last year. Five percent of people could not do so due to financial reasons (Table 6).

Table 6: Question: 'For what reasons, if any, have you not made any visits to the outdoors in the last 12 months?'. Options with no responses excluded. National Survey for Wales, 2018-19. Sample size 1150.

Why haven't made visits to outdoors in last year	
Physical disability	31
Other health reason	
Always too busy / lack of time	
Old age	
Bad / poor weather	
Not enough money / can't afford it	5

POSA Page 26 of 84

No-one to go with 2

3.4. Welsh Index of Multiple Deprivation

The Welsh Index of Multiple Deprivation (WIMD) is the official measure of relative deprivation for small areas in Wales. It identifies areas with the highest concentrations of several different types of deprivation. It is a National Statistic produced by statisticians at the Welsh Government.

WIMD ranks areas from 1 (most deprived) to 1,909 (least deprived). It does not provide a measure of the level of deprivation in an area, but rather whether an area is deprived relative to all other areas in Wales. The <u>WIMD 2019 Guidance</u> provides more information on use and interpretation of the results.

WIMD is currently made up of eight separate domains of deprivation. Those below consider the Physical Environment which measures factors that may impact on the wellbeing or quality of life of those living in a given area including proximity to ANGS³².

In 2019, the Carmarthenshire LA (including the BBNP area) contains 112 Low Super Output Areas (5.9% of the 1909 total in Wales). Of the 20% most deprived Low Super Output Areas in Wales within the Physical Environment domain, 24 are within the Carmarthenshire which accounts for 21.4% of those in the LA and 1.3% of those in Wales (Figure 3).

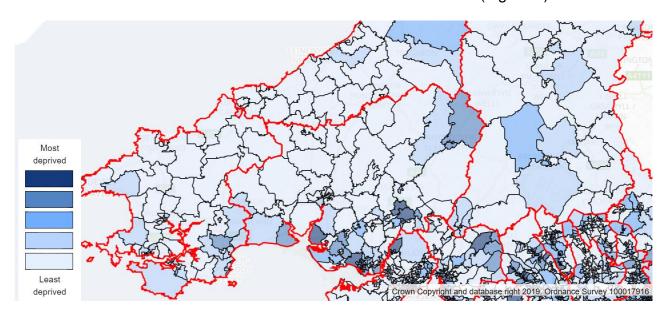


Figure 3. Deprived Low Super Output Areas in Carmarthenshire as assessed against indicators within the physical environment. Hengoed 2 (01001925), St. Ishmael 2 (W01000723), Llandybie 1 (W01000680), and Llandybie 2 (W01000681) are sequentially ranked the most deprived within the LA.

POSA Page 27 of 84

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³² Assessment it does not include cemeteries and gold courses. Not indication was given to suggest limited access (financial barriers) were also considered Welsh Index of Multiple Deprivation (WIMD) 2019: technical report (gov.wales).

3.5. Play Sufficiency

The Play Sufficiency Duty is placed upon the LA by section 11 of the Children and Families (Wales) Measure 2010³³. Introduced in two parts...

- the 1st part states that local authorities must assess whether their local area offers children enough opportunities to play; and
- the 2nd part says that LAs must secure enough opportunities for children to play in their area, as far is reasonable and practical.

The following is obtained from Play Sufficiency Assessment³⁴ published in March 2022.

CCC is committed to ensuring that all children and young people living in the County have access to exciting, stimulating, and creative play experiences that they need and want. We are committed to working with our partners to provide a range of supervised and unsupervised play provision that challenges children and young people. We recognise that high quality play opportunities, that are accessible to all, aids equality and helps mitigate the negative effects of poverty and other adverse childhood experiences.

Play is an essential part of children and young people's lives; the Local Authority acknowledges that choice is a fundamental part of play. Children and young people should be able to choose how they play and why they want to play. We understand that play is integral to children's physical and mental health and emotional wellbeing, and that it benefits all our children, families, and communities.

Play provides children with the opportunity to explore their world, who they are and their relationships. Play allows children to develop skills including socialising, problem solving, language development, creativity, communication, negotiation and listening. The Local Authority appreciates that a rich play environment is one where children and young people have the choice about how they play, and the choice to invent and extend play. The opportunity to play can be provided almost anywhere at almost any time. Children can play indoors or outdoors, in parks, play areas, greenspaces, family centres, soft play areas or youth clubs. Carmarthenshire's children can play in their homes, childcare settings or schools. There is a wealth of safe places for them to play.

Quality play provision provides children and young people with a rich and stimulating environment that is safe but full of challenge, where they can have fun, explore and learn. Children and young people of different ages, abilities and stages of development want and need different types of play. Providing appropriate play opportunities means taking into account a wide range of needs and developing a wide range of inclusive play provision.

The Play Sufficiency Assessment process is an opportunity for CCC to celebrate and acknowledge the importance of play. The established Play Sufficiency Stakeholder Group

POSA Page 28 of 84

³³ Children and Families (Wales) Measure 2010 (legislation.gov.uk)

³⁴ Play Sufficiency Assessment - Carmarthenshire Family Information Service (gov.wales)

will continue to meet on a termly basis to deliver the actions and continue to ensure that children and young people's play is prioritised.

As part of the assessment a public consultation was conducted amongst several stakeholders including Parent/Carers, and Town and Community Councils. The survey for Primary School Children was completed by 294 children from across Carmarthenshire. 60% of children who completed the survey said they go out to play or hang out with friends most days. With 59% saying they have just enough time to play, 20% say they have loads of time. The most popular place to play is 'in my house or a friend's house' (72%) followed by 'in a play area with swings, slides and other equipment to play on' (46%) and 'in my garden or a friend's garden' (28%). Other key findings include:

- 29% of children say they can't play in all the places they want to play, with the biggest barriers being 'it isn't safe' (51%) and 'my parent / carer won't let me' (43%). However, 45% of children say they always feel safe when playing or hanging out with friends.
- When asked 'what are grown-ups like when you are playing or hanging out' 58% said 'most adults are great and are happy with children playing out' only 3% said 'most adults are grumpy and hate children playing out.'
- It was almost a half and half split with 49% of children saying they were allowed to play out on their own. 81% are allowed to play out with their friends. 60% of children rely on an adult with a car to take them to play, 81% rely on an adult with a car to get them to school.
- 46% said that overall play opportunities in their community are 'great and couldn't be made much better' with just 4% saying 'it's rubbish.'
- 97% of those who go to school play in the school yard, with 84% saying that bad weather is the thing that stops them most from playing at school followed by too much schoolwork (31%).
- We also spoke to 23 children at School, People Speak Up Play Events and a session for home-schooled children. Most of these children said there was not enough for them to do in their local area and stated a preference for play at home or at a friend's. The exception to this being children who regularly participate in sports activities. Barriers to play included parental concerns about safety and needing a parent / carer to be with them to access play. They also expressed concern about feeling safe in places as a result of the behaviour of adults (drinking in parks and plays areas) and / or older children, for example teenagers making them feel uncomfortable in play spaces.

As part of the same public consultation, a separate survey was conducted amongst Secondary School Children. The survey was completed by 270 young people (aged between 12 and 18). Their responses shows that amount of time children spend playing or hanging out with friends decreases over time, as 44% of young people hang out with friends most days compared to 60% of children. For this age group the most popular activity is 'chatting and being with friends' (64%), followed by 'going to the cinema' (38%) and 'exploring' (34%). Other key findings include:

POSA Page 29 of 84

- 86% of this group said that they feel 'happy' when hanging out with friends, followed by 'excited' (43%), 'free' (42%) and 'active' (40%). The most popular place for this age group to hang out is a 'local grassy area or field' (37%) followed by somewhere else/ other' (33%) most people within this group selected their own home and 'the beach / seaside' (29%). 21% reported that in their community 'I cannot or hardly do what I like.'
- 84% of young people told us they hang out with friends in the school yard. Bad weather (59%) is the biggest barrier to spending time with friends at school followed by 'too much schoolwork' (32%) and 'there isn't a place where we can play / hang out' (22%).
- 57% of young people say there aren't places they need and want to hang out with friends in their community. Three barriers tied as the most significant barriers to hanging out; 'there's nothing to do there' (38%), 'I don't go out to play or hang out as it's too dark' (38%) and 'the COVID-19 pandemic' (38%). 54% of young people said COVID-19 had affected how they play and hang out.
- 62% do want to hang out more, and to do this young people want 'transport to help them get there' (59%), 'ask dog owners to pick up their dog mess' (22%) and 'help my parents understand that it's okay to hang out.'

Following the assessment process, the Play Sufficiency 2022 Report identified several gaps in provision. A full summary can be found on page 88 within the Report, however those shortfalls determined with regard to geographical scope are below:

- Rural areas are underserved, in part because provision aligns with need as defined by population and deprivation.
- 9 wards have no designated outdoor play spaces: Carmarthen Town North, Carmarthen Town South, Cynwyl Gaeo, Hengoed, Llanboidy, Llanfihangel Aberdythych, Llangeler, Mandoreilo & Salem and Trelech.
- 25 wards have no supervised play provision: Abergwili, Bigyn, Bynea, Cilycwm, Cynwyl Efed, Cynwyl Gaeo, Dafen, Elli, Gorslas, Hengoed, Laugharne Township, Llanboidy, Llanddarog, Llandelio, Llandovery, Llanfihangel Aberdythych, Llangadog, Llangyndeyrn, Llannon, Llansteffan, Pontamman, Saron, St. Ishmael, Trimsaran and Whitland. Note this information is based on play provision listed on Dewis.
- 16 wards have no play provision for older children and young people (indoor or outdoor provision for age 12+) Bigyn, Carmarthen Town North, Cynwyl Gaeo, Dafen, Glyn, Hengoed, Laugharne Township, Llanboidy, Llandeilo, Llanfihangel Aberdythych, Llangadog, Mandordelio & Salem, Pontyberem, St. Ishmael, Trelech and Trimsaran. Based on mid-year population estimates for 2021, 4,496 children and young people aged between 12 and 19 years of age live in these wards, 30% of that age group.

NB: It is important to note that the methodological differences between the Play Sufficiency Assessment and the present POSA may lead to slight variations in results.

3.6. Growing Food

POSA Page 30 of 84

The National Society of Allotments and Leisure Gardeners evidences the many benefits which community growing can provide³⁵, in summary:

- "Social Capital ... The social contact offered by gardening in an allotment environment helps to combat the lack of social capital embodied by loneliness, which has the equivalent risk to health as consuming 15 cigarettes daily and is twice as harmful as obesity".
- "Mental well-being There is a growing awareness of the role that gardening plays in both preventing and alleviating mental ill-health. Many allotment gardeners will tell you that a spell on the plot nurturing plants and contemplating nature makes them feel calmer and more hopeful and there have been recent studies that have measured this benefit."
- "Healthy activity The physical benefits of regular spells of gardening help plotholders to keep fit even if they have sedentary jobs, the physical exercise also contributes to their mental well-being. Gardening can also help to maintain good gait and balance in older gardeners and help with cognitive decline".
- "Contact with nature Working a plot year-round means that allotment holders experience the seasons, witness the behaviour of birds, insects and other animals and gain an understanding of the eco-system. This appreciation of the natural world also has the potential to inspire more environmentally aware behaviour by themselves and their children".

Consultation with the general population and other interested parties has been conducted, via a CCC hosted survey and feedback from members of Carmarthenshire Food Network³⁶.

The County is home to Bwyd Sir Gâr Food which is a partnership that brings together key strategic stakeholders from across the public, private and third sector, and is a part of the Sustainable Food Places network. Member organisations include CCC, Hywel Dda University Health Board, NRW, University of Wales Trinity Saint Davids, Carmarthenshire Food Network, Social Farms & Gardens, and Food Sense Wales, amongst others. The aim of the partnership is to develop a local, sustainable, inclusive, and resilient food system for the county that reflects a synthesis of the shared strategic aims of member organisations.

3.7. Greenspace Assessment

Locally distinctive evidence informs the Plan's policies in respect of open space. The Carmarthenshire Greenspace Assessment provides an audit of provision informed by national standards and guidance as well as local information on locally significant provision sourced from the local community and/or LA officers. The Study provides a spatial appreciation of where there are potential deficiencies and surpluses in provision across the County. It should be noted that a review of the Greenspace Assessment will be undertaken as part of the overall requirement to monitor and review the rLDP. Such a review will build

Page 31 of 84

POSA

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³⁵ Benefits of allotment gardening – The National Allotment Society (nsalg.org.uk)

³⁶ Food Survey for Carmarthenshire - CGGSC~CAVS

upon the work already undertaken and will seek to reflect changes in provision and accessibility to facilities.

3.8. SPG: Leisure & Open Space

Supplementary Planning Guidance (SPG) for the provision of leisure and open space for new development was adopted in September 2016. Production of the SPG took place following the adoption of the current LDP and has regard to National Planning Policy. The primary objective of this SPG was to develop an understanding of the various definitions of open space within the Carmarthenshire context as well as clarifying the Council's expectations in relation to planning obligations.

NB: This SPG will be subsequently reviewed in line with the emerging rLDP.

3.9. Demographics

Data from the Census 2021 revealed that Carmarthenshire has a growing population of 187,897 people which make up ~91182 households (using latest LLGP data). Demographics of each electoral wards is provided in Table 7. These figures are later used to calculate the 'Standard Requirement' for each electoral ward.

Table 7. Population and household estimates by Electoral Wards within the County obtained from Census 2021 data. ONS Crown Copyright Reserved [from Nomis on 30 January 2023]. * = These wards are shared with BBNP. ** = Calculated using the number of households and populations per ward (this does not consider the effect of communal residencies). Average household occupancy across all wards is 2.31.

Electoral Wards (2022)	Population	Households	Household Occupancy**
Abergwili	2,331	963	2.42
Ammanford	5,439	2,464	2.21
Betws	2,398	987	2.43
Bigyn	6,587	2,779	2.37
Burry Port	4,037	1,934	2.09
Bynea	4,519	1,886	2.40
Carmarthen Town North and South	9,111	4,317	2.11
Carmarthen Town West	5,521	2,283	2.42
Cenarth and Llangeler	5,550	2,468	2.25
Cilycwm	2,547	1,126	2.26
Cwarter Bach*	2,853	1,249	2.28
Cynwyl Elfed	2,273	931	2.44
Dafen and Felinfoel	5,195	2,207	2.35
Elli	1,988	867	2.29
Garnant*	2,049	886	2.31
Glanamman*	2,506	1,105	2.27

POSA Page 32 of 84

Glanymor	6,409	2,903	2.21
Glyn (Carmarthenshire)	2,163	939	2.30
Gorslas	5,082	2,153	2.36
Hendy	3,205	1,378	2.33
Hengoed (Carmarthenshire)	4,308	1,914	2.25
Kidwelly and St Ishmael	5,053	2,248	2.25
Laugharne Township*	2,588	1,150	2.25
Llanboidy*	2,097	855	2.45
Llanddarog	2,070	857	2.42
Llandeilo*	2,959	1,372	2.16
Llandovery*	2,591	1,119	2.32
Llandybie*	4,390	1,842	2.38
Llanegwad	2,444	1,061	2.30
Llanfihangel Aberbythych	1,749	766	2.28
Llanfihangel-ar-Arth	2,780	1,218	2.28
Llangadog*	1,941	820	2.37
Llangennech	5,437	2,275	2.39
Llangunnor	2,628	1,174	2.24
Llangyndeyrn	5,239	2,230	2.35
Llannon	5,368	2,231	2.41
Llanybydder	2,787	1,196	2.33
Lliedi	5,336	2,338	2.28
Llwynhendy	4,390	1,874	2.34
Manordeilo and Salem	2,625	1,123	2.34
Pembrey	4,175	1,780	2.35
Penygroes	3,052	1,317	2.32
Pontyberem	2,864	1,214	2.36
Saron	4,263	1,832	2.33
St Clears and Llansteffan	5,189	2,259	2.30
Swiss Valley	2,471	1,101	2.24
Trelech	2,731	1,133	2.41
Trimsaran	2,500	1,063	2.35
Tycroes	2,683	1,171	2.29
Tyisha	5,041	2,336	2.16
Whitland	2,381	1,067	2.23

By comparing the number of bedrooms a household requires against the number of available bedrooms, 81% of dwellings are determined to be under-occupied, with the mode having +2 or more spare bedrooms (Table 8).

POSA Page 33 of 84

2nd Deposit rLDP

Table 8. Occupancy rating for bedrooms within the Carmarthenshire (including BBNP) obtained from Census 2021 data. ONS Crown Copyright Reserved [from Nomis on 26 June 2023]. * = Zero suggests that a household's accommodation has an ideal number of bedrooms.

Occupancy Rating for Bedrooms	Observation
+2 or more	38471
+1	27511
0 *	14415
-1	1217
-2 or less	145

POSA Page 34 of 84

4. Audit Existing Provision

Summaries alluding to the overall provision within the county and each category of open space are provided under the following sections.

A map depicting all provisions audited can be found under the *Recreation/Open Space* layer on the rLDP proposal mapping platform³⁷.

4.1. Overall Provision in Carmarthenshire

The majority of Open Space provisions within Carmarthenshire are publicly accessible (Table 9). Public Open Spaces represents approximately 14% of the area of the County, however, when excluding ANGS (e.g. predominantly large areas of common farming land) the remaining categories combined make up just 0.51%.

Table 9. Open Space Provision within the County. Access of four Outdoor Sport Provisions (totalling 4.13 ha) remains unknown at time of writing.

Catagony	Public Open Spaces Number of Sites Area (Ha)		Other Recreational Spaces (Limited Access)	
Category			Number of Sites	Area (Ha)
Accessible Natural Green Space (ANGS)	324	29831.28	na	
Outdoor Sports Facilities	151	316.18	108	147.19
Play Space	214	25.97	na	
Formal Amenity Space (Allotments)	390 (15)	773.31 (9.28)	18	750.01
Total	1079	30946.74	126	897.2

4.2. Accessible Natural Green Space

There are no dedicated ANGS provisions in 11 wards (Table 10).

Table 10. Combined ANGS within the County by Electoral Wards. * = Ward shared with BBNP. NB: The combined figure of the number of sites is more than the overall provision due to those sites which intersected electoral ward boundaries.

Electoral Wards (2022)	Total Area (Ha)	Number of Sites
Abergwili	1171.76	13
Ammanford	0	0

POSA Page 35 of 84

³⁷ <u>Carmarthenshire County Council – Local Plan: 2nd Deposit Revised Carmarthenshire Local Development Plan 2018-2033 – Proposals Map (opus4.co.uk)</u>

Betws	162.06	14
Bigyn	0	0
Burry Port	3.77	1
Bynea	12.80	1
Carmarthen Town North and South	21.02	1
Carmarthen Town West	33.30	2
Cenarth and Llangeler	130.06	21
Cilycwm	6192.52	30
Cwarter Bach*	2642.10	6
Cynwyl Elfed	185.40	7
Dafen and Felinfoel	0	0
Elli	0	0
Garnant*	783.67	3
Glanamman*	621.25	4
Glanymor	6.24	1
Glyn (Carmarthenshire)	0	0
Gorslas	60.58	4
Hendy	0	0
Hengoed (Carmarthenshire)	8.20	2
Kidwelly and St Ishmael	15.17	3
Laugharne Township*	77.09	5
Llanboidy*	32.47	5
Llanddarog	176.30	10
Llandeilo*	632.84	15
Llandovery*	2876.46	32
Llandybie*	56.66	4
Llanegwad	3113.90	26
Llanfihangel Aberbythych	324.90	10
Llanfihangel-ar-Arth	1532.12	8
Llangadog*	6305.12	38
Llangennech	0.13	2
Llangunnor	4.24	3
Llangyndeyrn	161.53	9
Llannon	12.69	2
Llanybydder	1023.81	16
Lliedi	0	0
Llwynhendy	0	0
Manordeilo and Salem	1206.31	20

POSA Page 36 of 84

Pembrey	81.96	4
Penygroes	19.38	9
Pontyberem	0	0
Saron	32.83	12
St Clears and Llansteffan	36.14	11
Swiss Valley	0	0
Trelech	52.54	14
Trimsaran	3.62	1
Tycroes	17.95	5
Tyisha	0	0
Whitland	0.38	1

4.3. Play Space

There are 214 Play Spaces covering an area of 25.97 ha (Table 11). There are no dedicated play provisions in Elli.

Table 11. Combined Play Spaces within the County by Electoral Wards. * = Ward shared with BBNP. NB: The combined figure of the number of sites is more than the overall provision due to those sites which intersected electoral ward boundaries.

Electoral Wards (2022)	Total Area (Ha)	Number of Sites
Abergwili	0.23	2
Ammanford	1.20	9
Betws	0.48	3
Bigyn	1.63	6
Burry Port	0.66	7
Bynea	0.48	4
Carmarthen Town North and South	0.50	5
Carmarthen Town West	0.37	4
Cenarth and Llangeler	0.61	7
Cilycwm	0.16	6
Cwarter Bach*	2.02	11
Cynwyl Elfed	0.52	3
Dafen and Felinfoel	0.36	5
Elli	0.00	0
Garnant*	0.35	6
Glanamman*	0.73	5
Glanymor	0.85	4
Glyn (Carmarthenshire)	0.35	5

POSA Page 37 of 84

Gorslas	0.61	6
Hendy	0.78	3
Hengoed (Carmarthenshire)	0.23	2
Kidwelly and St Ishmael	0.56	7
Laugharne Township*	0.68	5
Llanboidy*	0.34	3
Llanddarog	0.19	4
Llandeilo*	0.44	3
Llandovery*	0.74	5
Llandybie*	0.45	3
Llanegwad	0.23	2
Llanfihangel Aberbythych	0.09	2
Llanfihangel-ar-Arth	0.36	4
Llangadog*	0.11	1
Llangennech	0.68	6
Llangunnor	0.03	2
Llangyndeyrn	1.00	7
Llannon	0.72	6
Llanybydder	0.22	3
Lliedi	0.43	3
Llwynhendy	0.94	2
Manordeilo and Salem	0.23	1
Pembrey	0.73	5
Penygroes	0.55	5
Pontyberem	0.32	2
Saron	0.34	5
St Clears and Llansteffan	0.48	8
Swiss Valley	0.08	1
Trelech	0.45	3
Trimsaran	0.49	3
Tycroes	0.28	5
Tyisha	0.22	2
Whitland	0.50	3

4.4. Outdoor Sports

There are 254 Outdoor Sports provisions, totalling an area of 449.45 ha (Table 12). There are no provisions in Elli. Nine site on the database were located outside of the County and have been excluded below.

POSA Page 38 of 84

Table 12. Combined Formal Amenity Space within the County by Electoral Wards. * = Ward shared with BBNP. NB: The combined figure of the number of sites is more than the overall provision due to those which intersected electoral ward boundaries.

Electoral Wards (2022)	Total Area (Ha)	Number of Sites
Abergwili	7.216136	4
Ammanford	24.486586	12
Betws	3.009872	4
Bigyn	11.691309	5
Burry Port	7.705906	3
Bynea	5.578551	4
Carmarthen Town North and South	24.702128	16
Carmarthen Town West	1.846624	2
Cenarth and Llangeler	11.314705	9
Cilycwm	1.385779	3
Cwarter Bach	8.003276	6
Cynwyl Elfed	4.721812	5
Dafen and Felinfoel	22.441666	11
Elli	0	0
Garnant	4.235446	2
Glanamman	2.25713	2
Glanymor	9.837239	4
Glyn (Carmarthenshire)	4.155884	4
Gorslas	15.801546	8
Hendy	5.133139	4
Hengoed (Carmarthenshire)	19.397767	5
Kidwelly and St Ishmael	15.381605	6
Laugharne Township	6.23096	2
Llanboidy	3.400904	4
Llanddarog	2.785774	4
Llandeilo	20.639929	6
Llandovery	19.221857	8
Llandybie	9.628895	7
Llanegwad	3.258294	3
Llanfihangel Aberbythych	0.181158	1
Llanfihangel-ar-Arth	2.181568	4
Llangadog	3.644351	2
Llangennech	9.673208	7
Llangunnor	3.566167	2

POSA Page 39 of 84

Llangyndeyrn	14.898821	7
Llannon	16.051938	9
Llanybydder	6.374089	7
Lliedi	12.416039	7
Llwynhendy	8.421425	5
Manordeilo and Salem	3.025765	3
Pembrey	20.817892	7
Penygroes	10.232518	6
Pontyberem	9.636363	4
Saron	6.747001	6
St Clears and Llansteffan	10.695712	7
Swiss Valley	0.751243	1
Trelech	3.539128	4
Trimsaran	8.203503	1
Tycroes	5.545776	5
Tyisha	3.145923	1
Whitland	14.234424	5

4.5. Formal Amenity

There is a total of 1523.32 ha of formal amenity spilt over 408 sites (Table 13). There are no provisions in Swiss Valley. Approximately 315 of these sites are religious grounds (e.g., churchyards, cemeteries).

Table 13. Combined Formal Amenity Space within the County by Electoral Wards. * = Ward shared with BBNP. NB: The combined figure of the number of sites is more than the overall provision due to those which intersected electoral ward boundaries.

Electoral Wards (2022)	Total Area (Ha)	Number of Sites
Abergwili	12.418412	9
Ammanford	3.347887	9
Betws	3.195206	7
Bigyn	5.322033	5
Burry Port	85.938966	11
Bynea	7.923995	3
Carmarthen Town North and South	13.474192	17
Carmarthen Town West	2.44769	4
Cenarth and Llangeler	9.5773	24
Cilycwm	23.546602	11
Cwarter Bach	17.645264	6
Cynwyl Elfed	1.85065	12

POSA Page 40 of 84

Dafen and Felinfoel	2.642018	5
Elli	0.702327	6
Garnant	5.554029	3
Glanamman	1.721575	4
Glanymor	24.368675	8
Glyn (Carmarthenshire)	2.029053	7
Gorslas	75.113358	6
Hendy	4.371416	5
Hengoed (Carmarthenshire)	151.438771	9
Kidwelly and St Ishmael	2.59621	11
Laugharne Township	8.621186	10
Llanboidy	1.679184	5
Llanddarog	211.994874	8
Llandeilo	208.818255	9
Llandovery	13.110062	7
Llandybie	35.27748	6
Llanegwad	13.264667	14
Llanfihangel Aberbythych	99.417679	11
Llanfihangel-ar-Arth	8.336408	9
Llangadog	70.359336	3
Llangennech	2.465761	8
Llangunnor	0.32244	3
Llangyndeyrn	6.25196	15
Llannon	67.117817	12
Llanybydder	2.324718	7
Lliedi	25.849878	7
Llwynhendy	0.839801	3
Manordeilo and Salem	40.179379	15
Pembrey	220.509312	6
Penygroes	1.460511	8
Pontyberem	2.88604	8
Saron	3.092066	7
St Clears and Llansteffan	3.550037	12
Swiss Valley	0	0
Trelech	4.010166	8
Trimsaran	0.877315	4
Tycroes	2.359607	8
Tyisha	9.990779	7

POSA Page 41 of 84

Whitland 1.13259	98 6
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POSA Page 42 of 84

4.6. Quality

Between 2022-23, Full Awards were held by Bishops Park (owned by the Tywi Gateway Trust), Llyn Llech Owain Country Park, and Pembrey Country Park (both owned by CCC). Community Awards were held by Cydweli Sensory Community Project, National Wool Museum Dye Garden, and Pontyberem Park. All are considered public open spaces. Overall, the County ranks 20th for award obtainment compared to other Welsh LAs, as foretold by award density (Table 14). Additionally, the County has only one beach designated as Blue Flag (Cefn Sidan – which was the first of its kind in Wales).

Table 14. Green Flag and Community Awards within Welsh LAs in 2022/23, ranked by award density. LA Area is approximate, and the County includes BBNP.

Rank	Local Authority	Award Count	LA Area (km²)	Award Density (km²)
1st	Cardiff	35	140	4.0
2nd	Merthyr	16	111	6.9
3rd	Caerphilly	25	278	11.1
4th	Vale of Glamorgan	28	335	12.0
5th	Swansea	22	378	17.2
6th	Torfaen	7	126	18.0
7th	Blaenau Gwent	5	109	21.8
8th	Newport	6	190	31.7
9th	Bridgend	7	246	35.1
10th	Rhondda Cynon Taff	11	424	38.5
11th	Neath Port Talbot	11	442	40.2
12th	Monmouthshire	16	850	53.1
13th	Conwy	20	1126	56.3
14th	Wrexham	8	498	62.3
15th	Denbighshire	10	844	84.4
16th	Flintshire	3	438	146.0
17th	Anglesey	5	771	154.2
18th	Pembrokeshire	7	1590	227.1
19th	Ceredigion	5	1795	359.0
20th	Carmarthenshire	6	2370	395.0
21st	Gwynedd	6	2535	422.5
22nd	Powys	6	5180	863.3

POSA Page 43 of 84

5. Benchmark Standards

Standards for the provision of open space have been previously developed by several invested parties. As outlined in TAN16, the development and subsequent testing of standards enable the identification of surpluses and deficiencies in quantities of open space, sport, and recreation, alongside any deficiencies in accessibility and quality. Where deficiencies are demonstrated, such information may be used to aid future decision making. For clarity, the predominate focus of this POSA was to quantitatively consider both the current quantity and accessibility of open space provision. Nonetheless, aspects of quality were also considered although no standards for quality have been explicitly provided (see previous Section 4.6).

The County's Adopted LDP 2006–2021³⁸ had explicitly prescribed a quantity standard for overall open space provision (as later outlined in Section 7.1, REC2).

An overview of the standards tested within this POSA can be found in Section 5.6. Intermediary sections review Benchmark Standards in addition to those outlined within Annex C of TAN16.

NB: The recommended standards for onward implementation are proposed in Section 7.3 (Table 22).

5.1. Charter for Open Spaces in Wales

In July 2020, the Open Spaces Society³⁹ had developed a charter targeted at the WG, LAs, and local communities to help secure the protection of open spaces and access to nature. It recommends there to be a duty placed on local authorities to ensure that everyone can enjoy good-quality, well-maintained and safe open space within 300m of their homes.

5.2. Accessible Natural Green Space

Accessible Natural Green Spaces (ANGS) are open spaces that are 'predominately natural' in character. The benefits of such places have been widely discussed. Recognising that ANGS make an important contribution to the quality of the environment and life in urban and rural areas, a toolkit produced by Natural Resources Wales (NRW) defines provision standards and proposes ways in which these standards can be measured. To avoid replication, it is recommended that for fuller understanding of greenspace concepts and the methodology used in defining ANGS, reference is to be made to the NRW Toolkit. The NRW standards for ANGS are:

POSA Page 44 of 84

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³⁸ Carmarthenshire Council - Local Development Plan 2006 - 2021

³⁹ Charter for Open Spaces in Wales - Open Spaces Society (oss.org.uk)

- No person should live more than 300m⁴⁰ from their nearest area of ANGS⁴¹;
- There should be at least one ANGS of 20ha or more, within 2km of every home;
- There should be at least one ANGS of 100ha or more, within 5km of every home;
- There should be at least one ANGS of 500ha or more, within 10km of every home.

NRW recommends a minimum standard of 0.25ha ANGS provision per 1000 population.

Additionally, the Woodland Trust collects data on accessible woodland across the UK and led the development of the Woodland Access Standards which are now widely adopted in forestry policy. It recommends that that everyone should have access to a wood of at least:

- 2 ha within 500m of every home;
- 20 ha within 4km of every home.

5.3. Play Space

It has long been recognised that outdoor opportunities for play, sports, and general physical activity are essential for the healthy development of children, young adults, and the wellbeing of all users regardless of age. Fields in Trust (FIT) has prepared benchmark standards for both Outdoor Sport Facilities and Provision for Children and Young People (which, within this assessment, is referred to collectively as 'Play Space'). Utilising the FIT standards helps to ensure that the provision of outdoor sport, play and informal open space is of a sufficient size to enable effective use; is in an accessible location and in close proximity to dwellings; and of a quality to maintain longevity and to encourage its continued use. Their usage is highlighted within TAN16 (paragraph 2.26).

The FIT benchmark standards⁴² for Play Space (PS) include:

- There should be at least 1.2ha of Playing Fields⁴³ for every 1000 population;
- There should be at least 1.6ha ⁴⁴ of Outdoor Sports Facilities for every 1000 population;
- Everybody should live within 1,200m of a Playing Pitch/Outdoor Sports Facility.

The Council previously recognises the three categories of play areas defined in the FIT 'Benchmark Standard' – Local Area for Play (LAP), Local Equipment Area for Play (LEAP),

POSA Page 45 of 84

⁴⁰ The Toolkit states 400m if 'buffer' analysis is being used. Page 28 states that "this takes into account the need for the walker to follow the road and footpath network to access greenspace, crossing streets and going round corners etc."

⁴¹ 300m is also an indicator used within Welsh Index of Multiple Deprivation.

⁴² The FIT standards states 300m if 'buffer' analysis is being used, as is the case in this study.

⁴³ As defined within <u>The Playing Fields (Community Involvement in Disposal Decisions) (Wales) Regulations</u> <u>2015</u>. Nevertheless, this also include 'playing pitches' as mentioned in paragraph 4.5.5 PPW11.

⁴⁴ This standard is in keeping with that identified within the SPG (2016), and as previously adopted by Council.

and Neighbourhood Equipped Area for Play (NEAP) ⁴⁵. FIT has produced minimum sizes, dimensions, and buffer zones for such areas. Conventionally, there have been categorised, in part, by the number of play experiences they provide (e.g., a LEAP is recommended to have a minimum of six play experience). These are also commonly used in determining the recommended provision of play spaces against the scale of proposed development ⁴⁶. Whilst it goes beyond the scope of the present POSA to exclusively review play sufficiency⁴⁷, the following standards were previously adopted by Council and have been adapted from those promoted by FIT ⁴⁸ to include:

- There should be at least 0.8ha ⁴⁹ of Provision for Children & Young People per 1000 population;
- Everybody should live within 400m of Provision for Children & Young People⁵⁰.
- There should be a total of 2.15 ha⁵¹ of Accessible Play Space for every 1000 population;

5.4. Formal Amenity Space

Formal amenity has multiple benefits for the health and well-being of the local population. There are categories of formal amenity that do not sit under ANGS or PS but are still important for people's quality of life. For the purpose of this assessment, formal amenity includes 'Amenity Green Space' which are defined as informal recreation spaces in an around housing such as village greens and cemeteries, in addition to 'Parks & Gardens' which include urban parks, country parks and formal gardens freely open to the public. These are in alignment with FIT standards.

FIT also have benchmark standards for POS, recognising the value that these spaces can play in complementing more formal outdoor space provision. These standards have been recommended with consideration of the NRW Outdoor Recreation and Access Enabling Plan 2015 – 2020, which supports the delivery of the overarching goals set out in the

POSA Page 46 of 84

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⁴⁵ Definitions previously made by the Council can be found within <u>Adopted Leisure & Open Space</u> <u>Requirements for New Developments (September 2016).</u> Minimum dimensions can be found in Table 4 (page 9) within FIT Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard (Wales)

⁴⁶ As demonstrated in Table 2 (page 7) of above document.

⁴⁷ A dedicated <u>Play Sufficiency Assessment</u> (March 2022) undertaken by the LA developed a separate distinct methodology.

⁴⁸ FIT recommends a minimum of "0.25ha of Equipped/Designated Play Areas" and "0.3ha of Other Outdoor Provision (e.g., Multi Use Games Areas and Skateboard Parks) for every 1000 of population".

⁴⁹ As noted in the SPG (2016), this standard is split into 0.6 ha of informal play areas and 0.2 ha of equipped play areas.

⁵⁰ This is to reflect a 5-minute walk, and the FIT standards for LEAPs. Regardless, No child should be living further than 100 metres from a small play area such as LAPs which themselves remain endorse within the <u>SPG (2016)</u>. Provisions of LAP could come under other amenity space.

⁵¹ As obtained from FIT <u>website</u>: "To calculate a total quantity provision for our formal standards, the figures for 'All outdoor sports' (which includes or 'Playing pitches' figure), 'Equipped/designate play areas' and 'Other outdoor provision' should be added together. This gives a figure of 2.15 hectares per 1,000 people".

Wellbeing of Future Generations (Wales) Act. Again, their usage is highlighted within TAN16 (paragraph 2.26).

The FIT benchmark standards for formal amenity suggests:

- There should be at least 0.8ha of Parks & Gardens for every 1000 of population;
- There should be at least 0.6ha of Amenity Green Space for every 1000 of population;
- Every dwelling should be within 710m of a Park or Garden;
- Every dwelling should be within 480m of an Amenity Green Space.

5.5. Allotments

There is a statutory duty placed on certain councils to provide allotments if there is demand. As noted with the *Smallholdings and Allotments Act 1908*⁵², if six residents want an allotment, and there are none available, then they can request that the relevant council to provide them with land suitable for an allotment. Additionally, recent guidance from WG⁵³ states that "the Well-being of Future Generations (Wales) Act 2015 sets out a clear obligation for public bodies to enable positive change that leads to a more resilient, secure and healthy Wales. By protecting and managing the current provision of allotments and growing spaces and supporting the demand-led development of new allotments and community growing projects, all public bodies in Wales can enable us to create a healthier and happier population and a more sustainable and secure food supply."

The benefits of gardening on individuals include increased physical and mental wellbeing, access to fresh fruit and vegetables, and well-used and cared for public spaces are natural by-products of allotment growing. These shared spaces have the added bonuses of creating closer community relationships and reducing social isolation which are recognised as key determining factor to a high quality of life.

The National Allotment Society recommends that authorities should supply 0.5 hectare (roughly equating to 20 plots) per 1,000 households⁵⁴.

POSA Page 47 of 84

⁵² See Part 2 concerning the provision of Allotments. <u>Small Holdings and Allotments Act 1908</u> (legislation.gov.uk)

⁵³ Guidance for Local Authorities, Town & Community Councils (gov.wales)

⁵⁴ National Society of Allotment (nsalg.org.uk)

5.6. Open Space Standards Tested

In reflection of the definition of Open Space utilised within this POSA, in conjunction with the review of recommended and existing adopted standards, the following standards have been devised in collaboration with a multidisciplinary workshop to suit the current context of the County, represent the needs of its communities, and the ambitions in line with LA priorities.

Explanatory text eluding to how this decision has been made is provided directly under each of the produced standards. For clarity, limited access spaces will not be considered in the determination of standard adherence.

A summary of those standards employed are provided below (Table 15).

Table 15. Summary of standards tested. Figure * = per 1000 households (not population). ** = 400m used accounting for mode of analysis.

Category	Quantity (hectares per 1000 population)	Accessibility (everybody within)
Accessible Natural Green Space	0.25	5-minute walk**
Play Space	0.8	5-minute walk**
Outdoor Sports	1.6	Playing Fields: 15-minute walk (1,200m)
Allotments	0.2*	-
Total Public Open Space Provision		2.45

POSA Page 48 of 84

Provision Quantity

1. There must be 2.45ha of accessible Public Open Space per 1000 people. Of this:

This equates to 24.5 sq. m per person⁵⁵, and is broadly in line with the 6-acre standard recommended by Fields in Trust. It is compiled of Play Space, Outdoor Sports, Accessible Greenspace, and Community Growing Spaces which are deemed publicly accessible (as further stipulated below). Whilst this figure is below the <u>5.35 hectares of minimum total open space recommended by FIT</u>, it may potentially represent a higher amount of freely accessible open space as FIT standards do not delineate between limited access spaces.

This overall figure must be considered holistically with the tested accessibility standards.

a. 0.8ha must be Play Space;

This figure has previously been adopted by Council and is significantly more than the minimum guideline recommended by FIT. However, given the increased focus on open space multifunctionality and identified concerns regarding the overall sustainability of traditional equipped play areas, the split between equipped and non-equipped areas is no longer considered.

b. 1.6ha must be Outdoor Sports;

This is line with those recommendations made by FIT, and has also been previously adopted by Council. This is to exclude limited access spaces (i.e., those Outdoor Sport Facilities and private Playing Pitches which are not freely accessible) to reflect the potential financial barriers to access. Facilities will be reviewed on an individual basis and, if deemed freely accessible (in part or fully), then they shall be included. Limited access spaces are still recognised to provide recreation benefit, particularly for team/club sports.

c. 0.25ha must be Accessible Natural Green Space; and

This is in keeping with NRW minimum recommendations. No delineation is made regarding woodlands and is, therefore, unsupportive of the Woodland Trust standards. This decision made considering the mosaic of ecosystem types throughout the County. Nevertheless, recent work undertaken within CCC's emerging Tree & Woodland Strategy⁵⁶ suggests the County is significantly deficient in tree canopy cover – the GBI Assessment is to cover this aspect more closely.

d. 0.2ha must be Allotments.

This has been formulated on the recommendations made by the National Allotment Society.

POSA Page 49 of 84

⁵⁵ To put this into perspective, this represents just 0.21% of the County. Based on the Census 2021 – 187,897 people would require a combined total of 460.3ha of Open Space. County calculated at 214,725ha. ⁵⁶ Not yet externally published at time of writing.

Provision Accessibility

2. Everyone should live within a 5-minute⁵⁷ walk of ...

a. an Accessible Greenspace; and

This is in keeping with the Open Space Society Charter. While 300m is an indicator used within Welsh Index of Multiple Deprivation, NRW states that if using a network analysis approach the 300m recommend buffer extended to 400m. This considers the need for the walker to follow the road and footpath network to access greenspace, crossing streets and going round corners etc.

b. Play Space.

Whilst reflecting the FIT accessibility standards for LEAPs, further delineation between Play Space type is not currently possible due to lack of evidence within the audit. As indicated within the <u>SPG (2016)</u>, no child should live further than 100 metres from a small play area (i.e., doorstep play space and LAP).

3. Everybody living in a major residential area should be within a fifteen-minute walk⁵⁸ of a Playing Field.

This is comparable to the 1.2km recommended in TAN16. Here a 'major residential area' refers to those settlements with development limits as defined in the rLDP (i.e., Tier 1, 2, and 3 settlements).

- 4. Everyone should live within...
 - a. 2km of a ANGS > 20ha
 - b. 5km of a ANGS >100ha
 - c. 10km of a ANGS >500ha

These standards will be assessed as recommended by NRW.

POSA Page 50 of 84

⁵⁷ In this context, a 5-minute walk is considered 400m.

⁵⁸ 1,200m

6. Results

Whilst the dataset employed was the best available at the time conducting this assessment, the interpretation of the following results is caveated on those outlined limitations of the employed methodology (Section 2.7) in addition to the changing nature of open space provisions.

6.1. Standard 1

a. Play Space

Table 16 outlines the results of the assessment of Play Space provision per Electoral Ward in Carmarthenshire, according to the benchmark standards as outlined in Section 5.6. No ward met the current adopted standards for play space provision. Carmarthen Town North and South has the greatest spatial deficiency in Play Space.

Table 16. Assessment of standard 1 (a). Those in red indicate a deficiency against the standard of 0.8ha per 1000 people. * = Ward shared with BBNP.

Electoral Wards (2022)	Standard Requirement (Ha)	Existing Provision (Ha)	Adequacy (+/-) (Ha)
Abergwili	1.86	0.23	-1.63
Ammanford	4.35	1.20	-3.15
Betws	1.92	0.48	-1.44
Bigyn	5.27	1.63	-3.64
Burry Port	3.23	0.66	-2.57
Bynea	3.62	0.48	-3.13
Carmarthen Town North and South	7.29	0.50	-6.78
Carmarthen Town West	4.42	0.37	-4.05
Cenarth and Llangeler	4.44	0.61	-3.83
Cilycwm	2.04	0.16	-1.88
Cwarter Bach*	2.28	2.02	-0.26
Cynwyl Elfed	1.82	0.52	-1.30
Dafen and Felinfoel	4.16	0.36	-3.79
Elli	1.59	0.00	-1.59
Garnant*	1.64	0.35	-1.29
Glanamman*	2.00	0.73	-1.27
Glanymor	5.13	0.85	-4.28
Glyn (Carmarthenshire)	1.73	0.35	-1.38
Gorslas	4.07	0.61	-3.46
Hendy	2.56	0.78	-1.78
Hengoed (Carmarthenshire)	3.45	0.23	-3.22

POSA Page 51 of 84

Kidwelly and St Ishmael	4.04	0.56	-3.49
Laugharne Township*	2.07	0.68	-1.39
Llanboidy*	1.68	0.34	-1.33
Llanddarog	1.66	0.19	-1.47
Llandeilo*	2.37	0.44	-1.93
Llandovery*	2.07	0.74	-1.33
Llandybie*	3.51	0.45	-3.06
Llanegwad	1.96	0.23	-1.73
Llanfihangel Aberbythych	1.40	0.09	-1.31
Llanfihangel-ar-Arth	2.22	0.36	-1.87
Llangadog*	1.55	0.11	-1.44
Llangennech	4.35	0.68	-3.67
Llangunnor	2.10	0.03	-2.07
Llangyndeyrn	4.19	1.00	-3.20
Llannon	4.29	0.72	-3.58
Llanybydder	2.23	0.22	-2.01
Lliedi	4.27	0.43	-3.84
Llwynhendy	3.51	0.94	-2.58
Manordeilo and Salem	2.10	0.23	-1.87
Pembrey	3.34	0.73	-2.61
Penygroes	2.44	0.55	-1.90
Pontyberem	2.29	0.32	-1.97
Saron	3.41	0.34	-3.07
St Clears and Llansteffan	4.15	0.48	-3.68
Swiss Valley	1.98	0.08	-1.90
Trelech	2.18	0.45	-1.73
Trimsaran	2.00	0.49	-1.51
Tycroes	2.15	0.28	-1.87
Tyisha	4.03	0.22	-3.81
Whitland	1.90	0.50	-1.40

POSA Page 52 of 84

b. Outdoor Sports

Table 17 outlines the results of the assessment of Outdoor Sports provision per Electoral Ward in Carmarthenshire, according to the benchmark standards as outlined in Section 5.6. Only twenty wards met this current adopted standards. Carmarthen Town West and Tyshia has the greatest spatial deficiency in Outdoor Sports.

Table 17. Assessment of standard 1 (b). Those in red indicate a deficiency against the standard of 1.6ha per 1000 people. * = Ward shared with BBNP.

Electoral Wards (2022)	Standard Requirement (Ha)	Existing Provision (Ha)	Adequacy (+/-) (Ha)
Abergwili	3.73	0	-3.73
Ammanford	8.70	17.93	9.23
Betws	3.84	1.87	-1.96
Bigyn	10.54	9.57	-0.97
Burry Port	6.46	6.13	-0.33
Bynea	7.23	2.94	-4.29
Carmarthen Town North and South	14.58	19.53	4.95
Carmarthen Town West	8.83	1.22	-7.62
Cenarth and Llangeler	8.88	4.33	-4.55
Cilycwm	4.08	1.39	-2.69
Cwarter Bach*	4.56	6.35	1.79
Cynwyl Elfed	3.64	2.45	-1.19
Dafen and Felinfoel	8.31	20.75	12.44
Elli	3.18	0.00	-3.18
Garnant*	3.28	4.24	0.96
Glanamman*	4.01	2.26	-1.75
Glanymor	10.25	9.04	-1.22
Glyn (Carmarthenshire)	3.46	4.03	0.57
Gorslas	8.13	3.84	-4.29
Hendy	5.13	1.64	-3.49
Hengoed (Carmarthenshire)	6.89	17.87	10.98
Kidwelly and St Ishmael	8.08	13.13	5.05
Laugharne Township*	4.14	6.23	2.09
Llanboidy*	3.36	0.00	-3.36
Llanddarog	3.31	2.10	-1.21
Llandeilo*	4.73	14.39	9.66
Llandovery*	4.15	16.82	12.68
Llandybie*	7.02	7.29	0.26
Llanegwad	3.91	0.34	-3.57

POSA Page 53 of 84

Llanfihangel Aberbythych	2.80	0.18	-2.62
Llanfihangel-ar-Arth	4.45	1.13	-3.32
Llangadog*	3.11	3.64	0.54
Llangennech	8.70	4.89	-3.81
Llangunnor	4.20	1.81	-2.39
Llangyndeyrn	8.38	5.11	-3.27
Llannon	8.59	10.80	2.21
Llanybydder	4.46	1.81	-2.65
Lliedi	8.54	11.40	2.86
Liwynhendy	7.02	2.27	-4.75
Manordeilo and Salem	4.20	0.13	-4.07
Pembrey	6.68	18.37	11.69
Penygroes	4.88	8.47	3.59
Pontyberem	4.58	6.22	1.64
Saron	6.82	3.24	-3.58
St Clears and Llansteffan	8.30	8.02	-0.28
Swiss Valley	3.95	0.00	-3.95
Trelech	4.37	2.80	-1.57
Trimsaran	4.00	8.20	4.20
Tycroes	4.29	3.52	-0.77
Tyisha	8.07	3.15	-4.92
Whitland	3.81	5.75	1.94

POSA Page 54 of 84

c. ANGS

Table 18 outlines the results of the assessment of ANGS provision per Electoral Ward in Carmarthenshire, according to the benchmark standards as outlined in Section 5.6. Only 13 wards have a deficiency in AGNS.

Table 18. Assessment of standard 1 (c). Those in red indicate a deficiency against the standard of 0.25ha per 1000 people. * = Ward shared with BBNP.

Electoral Wards (2022)	Standard Requirement (Ha)	Existing Provision (Ha)	Adequacy (+/-) (Ha)
Abergwili	0.58	1171.76	1171.18
Ammanford	1.36	0	-1.36
Betws	0.60	162.06	161.46
Bigyn	1.65	0	-1.65
Burry Port	1.01	3.77	2.76
Bynea	1.13	12.8	11.67
Carmarthen Town North and South	2.28	21.02	18.74
Carmarthen Town West	1.38	33.3	31.92
Cenarth and Llangeler	1.39	130.06	128.67
Cilycwm	0.64	6192.52	6191.88
Cwarter Bach*	0.71	2642.1	2641.39
Cynwyl Elfed	0.57	185.4	184.83
Dafen and Felinfoel	1.30	0	-1.30
Elli	0.50	0	-0.50
Garnant*	0.51	783.67	783.16
Glanamman*	0.63	621.25	620.62
Glanymor	1.60	6.24	4.64
Glyn (Carmarthenshire)	0.54	0	-0.54
Gorslas	1.27	60.58	59.31
Hendy	0.80	0	-0.80
Hengoed (Carmarthenshire)	1.08	8.2	7.12
Kidwelly and St Ishmael	1.26	15.17	13.91
Laugharne Township*	0.65	77.09	76.44
Llanboidy*	0.52	32.47	31.95
Llanddarog	0.52	176.3	175.78
Llandeilo*	0.74	632.84	632.10
Llandovery*	0.65	2876.46	2875.81
Llandybie*	1.10	56.66	55.56
Llanegwad	0.61	3113.9	3113.29
Llanfihangel Aberbythych	0.44	324.9	324.46

POSA Page 55 of 84

2nd Deposit rLDP

Llanfihangel-ar-Arth	0.70	1532.12	1531.43
Llangadog*	0.49	6305.12	6304.63
Llangennech	1.36	0.13	-1.23
Llangunnor	0.66	4.24	3.58
Llangyndeyrn	1.31	161.53	160.22
Llannon	1.34	12.69	11.35
Llanybydder	0.70	1023.81	1023.11
Lliedi	1.33	0	-1.33
Llwynhendy	1.10	0	-1.10
Manordeilo and Salem	0.66	1206.31	1205.65
Pembrey	1.04	81.96	80.92
Penygroes	0.76	19.38	18.62
Pontyberem	0.72	0	-0.72
Saron	1.07	32.83	31.76
St Clears and Llansteffan	1.30	36.14	34.84
Swiss Valley	0.62	0	-0.62
Trelech	0.68	52.54	51.86
Trimsaran	0.63	3.62	3.00
Tycroes	0.67	17.95	17.28
Tyisha	1.26	0	-1.26
Whitland	0.60	0.38	-0.22

POSA Page 56 of 84

d. Allotments

Table 19 outlines the results of the assessment of Allotments provision per Electoral Ward in Carmarthenshire, according to the benchmark standards as outlined in Section 5.6. Only two wards have a sufficiency in Allotment provisions.

Table 19. Assessment of standard 1 (d). Those in red indicate a deficiency against the standard of 0.20ha per 1000 people. * = Ward shared with BBNP.

Electoral Wards (2022)	Standard Requirement (Ha)	Existing Provision (Ha)	Adequacy (+/-) (Ha)
Abergwili	0.47	0.00	-0.47
Ammanford	1.09	0.53	-0.56
Betws	0.48	0.00	-0.48
Bigyn	1.32	0.41	-0.91
Burry Port	0.81	0.00	-0.81
Bynea	0.90	0.00	-0.90
Carmarthen Town North and South	1.82	3.64	1.82
Carmarthen Town West	1.10	0.00	-1.10
Cenarth and Llangeler	1.11	0.00	-1.11
Cilyewm	0.51	0.00	-0.51
Cwarter Bach*	0.57	0.00	-0.57
Cynwyl Elfed	0.45	0.00	-0.45
Dafen and Felinfoel	1.04	0.00	-1.04
Elli	0.40	0.00	-0.40
Garnant*	0.41	0.05	-0.36
Glanamman*	0.50	0.00	-0.50
Glanymor	1.28	0.16	-1.12
Glyn (Carmarthenshire)	0.43	0.00	-0.43
Gorslas	1.02	0.00	-1.02
Hendy	0.64	0.00	-0.64
Hengoed (Carmarthenshire)	0.86	0.00	-0.86
Kidwelly and St Ishmael	1.01	0.38	-0.64
Laugharne Township*	0.52	0.00	-0.52
Llanboidy*	0.42	0.00	-0.42
Llanddarog	0.41	0.00	-0.41
Llandeilo*	0.59	1.27	0.68
Llandovery*	0.52	0.00	-0.52
Llandybie*	0.88	0.00	-0.88
Llanegwad	0.49	0.00	-0.49
Llanfihangel Aberbythych	0.35	0.00	-0.35

POSA Page 57 of 84

2nd Deposit rLDP

Llanfihangel-ar-Arth	0.56	0.00	-0.56
Llangadog*	0.39	0.00	-0.39
Llangennech	1.09	0.00	-1.09
Llangunnor	0.53	0.00	-0.53
Llangyndeyrn	1.05	0.00	-1.05
Llannon	1.07	0.59	-0.48
Llanybydder	0.56	0.00	-0.56
Lliedi	1.07	0.56	-0.50
Llwynhendy	0.88	0.24	-0.63
Manordeilo and Salem	0.53	0.00	-0.53
Pembrey	0.84	0.53	-0.31
Penygroes	0.61	0.00	-0.61
Pontyberem	0.57	0.00	-0.57
Saron	0.85	0.00	-0.85
St Clears and Llansteffan	1.04	0.00	-1.04
Swiss Valley	0.49	0.00	-0.49
Trelech	0.55	0.00	-0.55
Trimsaran	0.50	0.00	-0.50
Tycroes	0.54	0.00	-0.54
Tyisha	1.01	0.71	-0.30
Whitland	0.48	0.21	-0.26

POSA Page 58 of 84

6.2. Standard 2

a. ANGS

Figure 4 depicts the area of the County which are within a five-minute walk of an ANGS. 10.56% of all residential homes fall within this area (equating to 9632 dwellings).

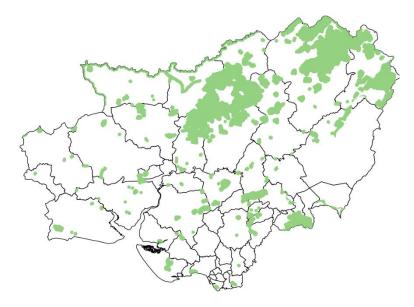


Figure 4. Assessment of standard 2 (a). Green represents the five-minute walking distance from a ANGS.

b. Play Space

Figure 5 depicts the area of the County which are within a five-minute walk of a Play Space. It was found that 38051 dwellings are within this area, equating to 41.73% of all residential homes.

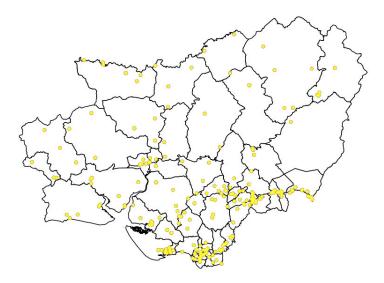


Figure 5. Assessment of standard 2 (b). Yellow represents the five-minute walking distance from a Play Space.

POSA Page 59 of 84

6.3. Standard 3

Figure 6 depicts the area of the County which are within a fifteen-minute walk of a Playing Field. This equates to 85.78% of all residential homes (78216 dwellings).

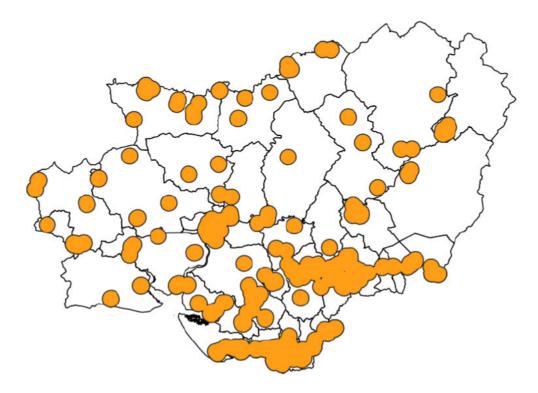


Figure 6. Assessment of standard 3. Orange represents the fifteen-minute walking distance from a Playing Field.

6.4. Standard 4

Table 20 shows the assessment of the standards recommended by NRW for the accessibility of ANGS, varied by size of overall provision. In summary, 19 wards were not within 2km of a site >20ha, 20 not within 5km of >100ha, and 21 not within 10km of 500ha – with several wards experiencing a deficiency in all three tested standards. There were several instances were a site just fell short of the assessment threshold (i.e., Dinefwr Parc Llandeilo at 19.83 ha) and more accurate boundary assessment could have led to the inclusion of such sites. Whilst beyond the scope of the assessment, it is important to note that these figures are likely to be different if ANGS sites outside of the LPA area were included (particularly for those boarding/shared electoral wards within 10km of County boundary).

Table 20. Assessment of standard 4 (a,b,c). Those in red indicate an absolute deficiency. * = Ward shared with BBNP.

Electoral Ward	Within 2km of Green		Within 5km of Green		Within 10km of	
	Space >20ha		Space > 100ha		Green Space > 500ha	
Electoral Ward	Proportion of Ward (%)		Proportion of Ward (%)	Area (Ha)	Proportion of Ward (%)	Area (Ha)

POSA Page 60 of 84

Abergwili	61	3807	88	5504	100	6285
Ammanford	13	41	100	312	100	312
Betws	92	1028	100	1116	100	1116
Bigyn	0	0	0	0	0	0
Burry Port	3	13	0	0	0	0
Bynea	0	0	0	0	0	0
Carmarthen Town North & South	17	215	0	0	55	681
Carmarthen Town West	80	691	0	0	14	119
Cenarth and Llangeler	51	5471	38	4020	27	2841
Cilycwm	74	18458	90	22530	100	24969
Cwarter Bach	100	3204	100	3204	100	3204
Cynwyl Elfed	44	4180	87	8182	75	7132
Dafen and Felinfoel	0	0	0	0	0	0
Elli	0	0	0	0	0	0
Garnant	100	1520	100	1520	100	1520
Glanamman	100	1229	100	1229	100	1229
Glanymor	0	0	0	0	0	0
Glyn	0	0	0	0	0	0
Gorslas	77	1266	100	1655	46	767
Hendy	0	0	0	0	82	778
Hengoed	0	0	0	0	0	0
Kidwelly and St. Ishmael	0	0	0	0	0	0
Laugharne Township	17	1731	0	0	0	0
Llanboidy	0	0	0	0	0	0
Llanddarog	72	3191	96	4292	27	1195
Llandeilo	79	3742	89	4235	100	4756
Llandovery	88	10280	100	11620	100	11620
Llandybie	82	2018	100	2469	100	2469
Llanegwad	68	10187	97	14457	100	14834
Llanfihangel Aberbythych	30	1482	71	3534	95	4710
Llanfihangel-ar-Arth	99	8812	87	7795	100	8931
Llangadog	91	17609	100	19323	100	19323
Llangennech	0	0	0	0	1	8
Llangunnor	0	0	14	318	24	571
Llangyndeyrn	25	2007	9	705	0	0
Llannon	1	23	20	772	46	1763
Llanybydder	91	6504	88	6257	100	7132
Lliedi	0	0	0	0	0	0
Llwynhendy	0	0	0	0	0	0
Manordeilo and Salem	66	8041	71	8589	100	12103
Pembrey	53	1987	0	0	0	0
Penygroes	47	337	100	711	100	711
Pontyberem	37	499	19	250	0	0
Saron	0	0	96	945	100	988
St. Clears and Llansteffan	10	893	0	0	0	0
Swiss Valley	0	0	0	0	0	0
Trelech	16	2387	1	113	8	1213
Trimsaran	13	262	0	0	0	0
Tycroes	0	0	42	709	100	1692
Tyisha	0	0	0	0	0	0
Whitland	0	0	0	0	0	0

POSA Page 61 of 84

7. Recommendations

7.1. Open Space Policy

The following LDP (2006-2021) policies have been provided below for context as the adoption of the rLDP will be effectively replacing these.

Policy REC1 Protection of Open Space

Provision will be made to protect and wherever possible enhance accessibility to open space.

Proposals which result in the loss of existing open space will only be permitted where:

- a. It is demonstrated that there is provision of at least equivalent value available within the settlement, or where applicable the sustainable community, in an accessible location; and,
- b. It is demonstrated that the need for the facility has ceased; and,
- c. A deficiency of open space is not created through its loss; or,
- d. The re-development of a small part of the site would allow for the retention and improvement of the facility.

Policy REC2 Open Space Provision and New Developments

All new residential developments of five or more units will be required to provide on site open space in accordance with the Council's adopted standards of 2.4ha per 1000 population.

In the event that the above standards cannot be met on site, or where there is sufficient existing provision already available to service the development, then off site financial contributions will be sought as and where appropriate.

Policy REC3 Proposed New Open Space

Provision is made for new open space proposals at the following locations as depicted on the proposals map:

POS1South of Picton Terrace, Carmarthen

POS2Land to the rear of Ammanford Comprehensive School

POS3Land to the rear of Station Road, St Clears

POS4Land at Dylan, Trallwm, Llanelli

POSA Page 62 of 84

The following wording was proposed in the rLDP (2018-33) Policies (1st Deposit).

PSD7: Protection of Open Space

Provision will be made to protect and wherever possible enhance accessibility to open space.

Proposals which result in the loss of existing open space will only be permitted where:

- a. It is demonstrated that there is provision of at least equivalent value available within the settlement, or appropriately accessible location; and,
- b. It would not cause or exacerbate a deficiency of open space; or,
- c. The re-development of a small part of the site would allow for the retention and improvement of the majority of the facility; or,
- d. A satisfactory financial contribution towards compensatory provision is provided as an acceptable alternative facility.

PSD8: Provision of New Open Space

All new residential developments of ten or more homes will be required to contribute towards open space in accordance with the Council's open space standards.

In the event that the standards cannot be met on site, or where there is sufficient existing provision already available to service the development, then a commuted sum will be sought where appropriate.

For clarity, this POSA was undertaken during (but was finalised following) the consultation of the 2nd rLDP. Please refer to the previous OSA undertaken in 2019 for commentary specifically informing the 1st Deposit rLDP.

Policies should seek to protect open space spaces to ensure that they can continue to provide value and utility to the community, even within areas identified as having a surplus. In areas of deficiency, it is important that the creation of new spaces is encouraged in addition to the protection of existing spaces. Any losses must be adequately mitigated.

As PSD8 does not adhere to the standards of 5 homes recommended within the FIT standards for the provisions of play spaces, it is recommendation that five (instead of ten) or more homes should require associated planning contributions for open space ⁵⁹.

Both these policies would benefit further clarification through Supplementary Planning Guidance (SPG). Within the support text, reference may also be made to other relevant SPGs including Planning Obligations, Placemaking and Sustainable Design, in addition to those surrounding nature conservation and biodiversity.

POSA Page 63 of 84

⁵⁹ Policy recommendation has already been incorporated into the 2nd deposit version of PSD8.

7.2. Site Assessment (LDP Allocations)

Information set out in this section has collectively informed the assessment of rLDP site allocations (see question 14 within the SAM⁶⁰).

Of the 187 allocations contained within the deposit rLDP, 40 are within a 5-minute walk of a play space and 147 are within a 15-minute walk a playing field. However, when existing ward provisions are taken in account just allocations 73 are within a 15-minute walk of playing field with sufficient capacity. None are within a ward with sufficient play space capacity (Table 21).

Only seven allocations were within a 5-minute walk to an ANGS (PrC1/h12, SuV27/h1, SeC13/h1, SeC14/h1, SuV61/h1, PrC3/h26, PrC3/h24).

34 proposed allocations will not have access to open space regardless of ward capacity (either within a 5-minute walk of a play space or a 15-minute walk of a playing field). These are as follows: PrC1/h20, PrC1/h15, PrC1/h19, PrC2/h13, PrC2/h10, PrC2/h27, PrC2/h14, PrC2/h12, PrC2/h19, PrC2/h6, PrC1/h18, PrC2/h1, PrC1/h2, PrC1/h4, PrC2/h15, PrC1/h9, PrC1/h17, PrC2/h21, PrC2/h23, PrC2/h20, PrC2/h18, PrC1/h16, PrC2/h24, PrC1/h11, PrC2/h28, PrC2/h3, PrC2/h22, PrC2/h25, PrC2/h26, PrC1/h8, PrC1/h3, PrC1/h14.

POSA Page 64 of 84

⁶⁰ Page 15 of the Site Assessment Methodology September 2022, "Q14. Does the site have access to green space, leisure, and recreational facilities that are within a reasonable distance?".

2nd Deposit rLDP

Table 21. Overview of allocations, access, and their impact upon existing open space provisions.

			Outdoor Sports (Playing Field)		Play Space			
Site Ref	Name	Settlement	Access?	Ward Capacity	Shortfall created/ exacerbated?	Access?	Ward Capacity	Shortfall created/ exacerbated?
Cluster 1								
SeC20/h2	113 Heol Y Prior	Carmarthen	Υ	Υ	Not Likely	Υ	N	Υ
PrC1/h10	Aberdeuddwr / Pantyfedwen	Peniel	N	-	Υ	Υ	N	Υ
PrC1/h21	Gerllaw Tyle Teg, Heol Llysonnen	Carmarthen	N	-	Υ	Υ	N	Υ
PrC1/h5	Heol Bronwydd (De)	Carmarthen	N	-	Υ	Υ	N	Υ
PrC3/h11	Brynhyfryd	Carmarthen	Υ	N	Υ	Υ	N	Υ
PrC1/h7	Heol Castell Pigyn, Abergwili	Carmarthen	N	-	Υ	Υ	N	Υ
PrC2/h16	Tir gerllaw Lleine	Cynwyl Elfed	N	-	Υ	Υ	N	Υ
SuV36/h2	Tir gerllaw Ty Gwynfa	Carmarthen	Υ	Υ	Not Likely	Υ	N	Υ
SuV26/h1	Tir cyfagos Capel Tabernacle	Pontyates	Υ	Υ	Not Likely	Υ	N	Υ
SeC18/h7	Tir y tu cefn i Maesgriffith	Llansteffan	Υ	N	Υ	Υ	N	Υ
PrC3/h34	Lime Grove	Pontyates	Υ	N	Υ	Υ	N	Υ
SuV16/h1	Heol Llwynddewi	Capel Dewi	Υ	Υ	Not Likely	Υ	N	Υ
SeC7/h4	Fferm Penybont, Heol Llysonnen	Carmarthen	Υ	Υ	Not Likely	Υ	N	Υ
SeC1/h3	Rhiw Babell	Carmarthen	Υ	N	Υ	Υ	N	Υ
SuV23/h2	Stryd y Cei	Carmarthen	Υ	Υ	Not Likely	N	-	Υ
SeC3/h3	5-8 Heol Spilman	Carmarthen	Υ	Υ	Not Likely	N	-	Υ
PrC1/h20	Gerllaw Fron Heulog	Cynwyl Elfed	N	-	Υ	N	-	Υ
PrC3/h26	Gerllaw Gwyn Villa	Llanpumsaint	Υ	N	Υ	N	-	Υ
SeC4/h2	Cae Canfas, Heol Llanelli	Pontyates	Υ	Υ	Not Likely	N	-	Υ
SuV18/h1	Llys Caradog	Ferryside	Υ	Υ	Not Likely	N	-	Υ
PrC1/h15	Castell Howell	Carmarthen	N	-	Υ	N	-	Υ
PrC1/h19	Fferm Cefn	Rhydargaeau	N	-	Υ	N	-	Υ
SeC6/h1	Clos Tawelan	Carmarthen	Υ	Υ	Not Likely	N	-	Υ
SeC7/h3	Dwyrain o Rhodfa Deveraux	Carmarthen	Υ	Υ	Not Likely	N	-	Υ
PrC2/h13	Tir gerllaw a ti cefn i Haulfan	Llanddarog	N	-	Υ	N	-	Υ
SuV30/h1	Tir gerllaw Fferm Llwynhenry	Porthyrhyd	Υ	Υ	Not Likely	N	-	Υ

POSA Page 65 of 84

			Outdoor Sports (Playing Field)		Play Space			
Site Ref	Name	Settlement	Access?	Ward Capacity	Shortfall created/ exacerbated?	Access?	Ward Capacity	Shortfall created/ exacerbated?
SuV55/h2	Tir yn 8 Heol Llanelli	Pontyates	Υ	Υ	Not Likely	N	-	Υ
PrC2/h10	Tir ar Ysgol Alltwalis	Alltwalis	N	-	Υ	N	-	Υ
PrC2/h27	Tir ym Maesglasnant	Cwmmffrwd	N	-	Υ	N	-	Υ
SeC19/h1	Tir yn Fferm Troed Rhiw	Bronwydd	Υ	N	Υ	N	-	Υ
PrC2/h14	Tir gerllaw A40, Pontargothi	Pontargothi	N	-	Υ	N	-	Υ
PrC2/h12	Tir cyfagos Heol Glyndwr	Pontyates	N	-	Υ	N	-	Υ
SuV58/h1	Tir yn Heol Llanelli	Pontyates	Υ	Υ	Not Likely	N	-	Υ
SuV36/h1	Tir gerllaw Parc y Delyn	Carmarthen	Υ	Υ	Not Likely	N	-	Υ
PrC2/h19	Tir gyferbyn a Neuadd y Pentref	Llanddarog	N	-	Υ	N	-	Υ
SuV55/h1	Tir y tu cefn i Parc y Ffynnon	Ferryside	Υ	Υ	Not Likely	N	-	Υ
SuV8/h1	Ysgol Llanarthne	Llanarthne	Υ	Υ	Not Likely	N	-	Υ
PrC3/h35	Llandre	Llanpumsaint	Υ	N	Υ	N	-	Υ
SuV15/h1	Heol Llansteffan	Carmarthen	Υ	Υ	Not Likely	N	-	Υ
PrC3/h8	Mounthill	Carmarthen	Υ	N	Υ	N	-	Υ
PrC2/h6	Y Tu ol i hen saerniaeth, Ffordd yr Orsaf	Nantgaredig	N	-	Υ	N	-	Υ
PrC3/h21	Estyniad Rhiw Babell	Carmarthen	Υ	N	Υ	N	-	Υ
PrC3/h19	De o Dol Y Dderwen	Llangain	Υ	N	Υ	N	-	Υ
PrC1/h18	De o Pentre	Peniel	N	-	Υ	N	-	Υ
SuV17/h1	Heol Springfield	Carmarthen	Υ	Υ	Not Likely	N	-	Υ
Cluster 2								
SeC4/h3	Cae Linda	Trimsaran	Υ	Υ	Not Likely	Υ	N	Υ
SeC6/h3	Cyn Iard Dinas	Kidwelly	Υ	Υ	Not Likely	Υ	N	Υ
SeC7/h1	Cyn-labordy Lon Pen-y-fai	Llanelli (Furnace)	Υ	Υ	Not Likely	Υ	N	Υ
PrC3/h24	Genwen, Bryn	Llanelli (Bryn)	Υ	N	Υ	Υ	N	Υ
PrC3/h36	Llwyngwern	Hendy	Υ	N	Υ	Y	N	Υ
PrC3/h2	Doc y Gogledd	Llanelli	Υ	N	Υ	Υ	N	Υ
SeC20/h1	Ynys Las, Cefncaeau	Llanelli (Llwynhendy)	Υ	N	Υ	Υ	N	Υ
PrC2/h7	107 Heol yr Orsaf	Llanelli	Υ	N	Υ	N	-	Υ
PrC2/h9	13-15 Heol yr Orsaf	Llanelli	Υ	N	Υ	N	-	Υ

POSA Page 66 of 84

			Outdoor Sports (Playing Field)		Play Space			
Site Ref	Name	Settlement	Access?	Ward Capacity	Shortfall created/ exacerbated?	Access?	Ward Capacity	Shortfall created/ exacerbated?
SeC20/h3	3-5 Heol Goring	Llanelli	Υ	Υ	Not Likely	N	-	Υ
SeC3/h2	42 Heol Stepney	Llanelli	Υ	Υ	Not Likely	N	-	Υ
SeC3/h4	Awel y Mynydd	Pembrey	Υ	Υ	Not Likely	N	-	Υ
SeC4/h1	Beech Grove, Pwll	Llanelli (Pwll)	Υ	Υ	Not Likely	N	-	Υ
PrC3/h22	Fferm Bocs	Llangennech	Υ	N	Υ	N	-	Υ
SeC1/h1	Ochr yr Harbwr, Porth Tywyn	Burry Port	Υ	N	Υ	N	-	Υ
PrC3/h13	Clos Ffordd Fach	Llanelli (Llwynhendy)	Υ	N	Υ	N	-	Υ
SeC6/h2	Clos y Parc	Five Roads	Υ	Υ	Not Likely	N	-	Υ
PrC3/h14	Coed y Bronallt	Hendy	Υ	N	Υ	N	-	Υ
PrC3/h15	Cwm y Nant, Dafen	Llanelli (Dafen)	Υ	N	Υ	N	-	Υ
PrC2/h1	Porth Dwyrain Dafen	Llanelli (Dafen)	N	-	Υ	N	-	Υ
PrC3/h20	Dylan, Trallwm	Llanelli (Trallwm)	Υ	N	Υ	N	-	Υ
PrC1/h2	Ffos Las	Carway	N	-	Υ	N	-	Υ
SeC8/h3	Garreglwyd	Pembrey	Υ	Υ	Not Likely	N	-	Υ
SeC1/h4	Teras Glanmor	Burry Port	Υ	N	Υ	N	-	Υ
PrC1/h4	Golwg Gwendraeth	Carway	N	-	Υ	N	-	Υ
PrC3/h29	Golwg Yr Afon	Llangennech	Υ	N	Υ	N	-	Υ
PrC3/h16	Cwrt Gwdig	Burry port	Υ	N	Υ	N	-	Υ
SuV1/h1	Gerddi Gwenllian	Mynyddygarreg	Υ	Υ	Not Likely	N	-	Υ
PrC3/h31	Harddfan, Bryn	Llanelli (Bryn)	Υ	N	Υ	N	-	Υ
PrC3/h33	Heol Y Graig, Llwynhendy	Llanelli (Llwynhendy)	Υ	N	Υ	N	•	Υ
SuV33/h1	Tir gerllaw Little Croft	Five Roads	Υ	Υ	Not Likely	N	-	Υ
SuV37/h2	Tir gerllaw Y Dell, Ffwrnes	Llanelli (Furnace)	Υ	Υ	Not Likely	N	-	Υ
SeC10/h1	Tir gerllaw 19 Heol Llwynhendy	Llanelli	Υ	N	Υ	N	-	Υ
SeC12/h2	Tir gerllaw i Clos Benallt Fawr, Fforest	Fforest	Υ	N	Υ	N	-	Υ
SuV32/h1	Tir gerllaw i Ty Newydd, Heol Meinciau	Mynyddygarreg	Υ	Υ	Not Likely	N	-	Υ
SeC18/h5	Tir rhwng Heol Clayton a Dwyrain Heol Broanllt	Hendy	Υ	N	Υ	N	-	Υ
PrC2/h15	Tir gerllaw Clos-y-Berllan	Llanelli (Bryn)	N	-	Υ	N	-	Υ
SeC18/h4	Tir oddi ar Teras Frondeg	Llanelli	Υ	N	Υ	N	-	Υ

POSA Page 67 of 84

			Outdo	Outdoor Sports (Playing Field)		Play Space		
Site Ref	Name	Settlement	Access?	Ward Capacity	Shortfall created/ exacerbated?	Access?	Ward Capacity	Shortfall created/ exacerbated?
SuV49/h1	Tir oddi ar Stryd	Kidwelly	Υ	Υ	Not Likely	N	-	Υ
SuV19/h2	Llys Felin	Kidwelly	Υ	Υ	Not Likely	N	-	Υ
PrC3/h37	Llys yr Hen Felin, Canol Tref	Llanelli	Υ	N	Υ	N	-	Υ
PrC3/h5	Maes Y Bryn, Bryn	Llanelli (Bryn)	Υ	N	Υ	N	-	Υ
PrC3/h6	Maesarddafen Road / Erw Las, Llwynhendy	Llanelli (Llwynhendy)	Υ	N	Υ	N	-	Υ
PrC1/h9	Maesydderwen	Llangennech	N	-	Υ	N	-	Υ
PrC3/h3	Gyferbyn Parc Morlais	Llangennech	Υ	N	Υ	N	-	Υ
SuV22/h2	Parc y Strade	Llanelli	Υ	Υ	Not Likely	N	-	Υ
PrC3/h12	Cefn i 22c,22d a 22e Heol Llwynhendy	Llanelli (Llwynhendy)	Υ	N	Υ	N	-	Υ
Cluster 3								
SuV10/h2	Gerllaw Rhif 13 Heol Y Coroni	Garnant	Υ	Υ	Not Likely	Υ	N	Υ
SuV10/h1	Gerllaw Pant y Brwyn	Ystradowen	Υ	Υ	Not Likely	Υ	N	Υ
SeC14/h1	Tir gerllaw i Ty Newydd	Carmel	Υ	N	Υ	Υ	N	Υ
SeC14/h2	Tir gerllaw Maes Ifan, Heol Maesquarre	Ammanford (Betws)	Υ	N	Υ	Υ	N	Υ
SeC19/h2	Tir yn Fforest Fach	Tycroes	Υ	N	Υ	Υ	N	Υ
SeC1/h5	Tir ar Heol Waterloo	Penygroes	Υ	N	Υ	Υ	N	Υ
SeC1/h7	Tir De o Heol Ty-croes	Tycroes	Υ	N	Υ	Υ	N	Υ
SuV61/h1	Yr Hen Felin, Heol Pontamman	Ammanford	Υ	Υ	Not Likely	Υ	N	Υ
SuV43/h1	Tir oddi ar Pant Y Blodau	Penygroes	Υ	Υ	Not Likely	N	-	Υ
PrC3/h25	Gerllaw Coed y Cadno	Cwmgwili	Υ	N	Υ	N	•	Υ
SuV12/h1	Glofa Betws	Ammanford (Betws)	Υ	Υ	Not Likely	N	-	Υ
SeC8/h2	Garej Central	Tumble	Υ	Υ	Not Likely	N	-	Υ
SeC5/h1	Clos Felingoed	Llandybie	Υ	Υ	Not Likely	N	-	Υ
SeC5/h2	Clos Penpont	Penygroes	Υ	Υ	Not Likely	N	-	Υ
PrC1/h17	Clos y Gat	Castell yr Rhingyll	N	-	Υ	N	-	Υ
SeC8/h1	Ffordd y Neuadd a Clos yr Eithin	Cross Hands	Υ	Υ	Not Likely	N	-	Υ
SeC6/h4	Cyn Orsaf Betrol, Stry-y-Gwynt	Ammanford	Υ	Υ	Not Likely	N	-	Υ
SuV63/h1	Ysgol Garnant, Heol Ysgol Newydd	Garnant	Υ	Υ	Not Likely	N	-	Υ
SuV14/h1	Heol Gelynen	Brynamman	Υ	Υ	Not Likely	N	-	Υ

POSA Page 68 of 84

			Outdoor Sports (Playing Field)			Play Space		
Site Ref	Name	Settlement	Access?	Ward Capacity	Shortfall created/ exacerbated?	Access?	Ward Capacity	Shortfall created/ exacerbated?
SuV3/h1	Tir gerllaw Brynlluan	Gorslas	Υ	Υ	Not Likely	N	-	Υ
SuV35/h1	Tir gerllaw Maesyrhaf	Cross Hands	Υ	Υ	Not Likely	N	-	Υ
SeC1/h6	Tir cyfagos i A48 a Heol y Parc	Cross Hands	Υ	N	Υ	N	-	Υ
SuV25/h1	Tir ar safle'r ffatri rhwng Rhif 22 & 28 Heol Bethesda	Tumble	Υ	Υ	Not Likely	N	-	Υ
PrC2/h4	Tir yn Ffynnon Fach	Bancffosfelen	N	-	Υ	N	-	Υ
SuV56/h1	Tir yn Gwynfryn Fawr	Ammanford	Υ	Υ	Not Likely	N	-	Υ
SeC19/h3	Tir yn Heol Cae Pownd	Cross Hands	Υ	N	Υ	N	-	Υ
SuV38/h1	Tir i'r cefn o 16-20 & 24-30 Heol Betws	Ammanford (Betws)	Υ	Υ	Not Likely	N	-	Υ
SuV51/h1	Tir rhwng 123 a 137 Heol Waterloo	Penygroes	Υ	Υ	Not Likely	N	-	Υ
PrC2/h21	Tir i'r Gogledd o Clos Rebecca	Llannon	N	-	Υ	N	-	Υ
SuV4/h1	Tir i'r Gogledd o Maespiode	Llandybie	Υ	Υ	Not Likely	N	-	Υ
PrC2/h23	Tir oddi ar Heol Y Gat	Penygroes	N	-	Υ	N	-	Υ
SeC17/h2	Tir oddi ar Heol Caegwyn	Drefach	Υ	N	Υ	N	-	Υ
SuV58/h2	Tir yn Heol Llannon	Pontyberem	Υ	Υ	Not Likely	N	-	Υ
SeC18/h1	Tir oddi ar Heol y Parc	Cefneithin	Υ	N	Υ	N	-	Υ
SuV41/h2	Tir oddi ar Llys y Nant	Llandybie	Υ	Υ	Not Likely	N	-	Υ
SeC18/h2	Tir oddi ar Nant-y-Ci	Saron	Υ	N	Υ	N	-	Υ
SeC18/h3	Tir oddi ar Parc-y-Mynydd	Saron	Υ	N	Υ	N	-	Υ
SuV19/h1	Llys Dolgader	Ammanford	Υ	Υ	Not Likely	N	-	Υ
SuV20/h1	Maespiode	Llandybie	Υ	Υ	Not Likely	N	-	Υ
PrC3/h9	Nantydderwen	Drefach	Υ	N	Υ	N	-	Υ
PrC2/h20	Tir i'r cefn o Garreg Lwyd	Llanedi	N	-	Υ	N	-	Υ
SeC7/h5	Fferm Tirychen	Ammanford	Υ	Υ	Not Likely	N	-	Υ
Sec2/h2	Uwch Gwendraeth	Drefach	Υ	N	Υ	N	-	Υ
Cluster 4								
PrC1/h12	Blossom Inn	New Inn	N	-	Υ	Υ	N	Υ
PrC3/h1	Bro Einon	Llanybydder	Υ	N	Υ	Υ	N	Υ
PrC3/h32	Heol Dewi	Newcastle Emlyn	Υ	N	Υ	Υ	N	Υ

POSA Page 69 of 84

			Outdoor Sports (Playing Field)			Play Space		
Site Ref	Name	Settlement	Access?	Ward Capacity	Shortfall created/ exacerbated?	Access?	Ward Capacity	Shortfall created/ exacerbated?
SeC13/h1	TIr gerllaw i Lleinau	Cwmann	Υ	N	Υ	Υ	N	Υ
SeC16/h1	TIr i'r De o Cae Coedmor	Cwmann	Υ	N	Υ	Υ	N	Υ
PrC3/h28	Gerllaw Y Neuadd	Llanybydder	Υ	N	Υ	N	-	Υ
PrC2/h18	Tir gerllaw Yr Hendre	Llanfihangel ar Arth	N	-	Υ	N	-	Υ
PrC3/h23	Garej Blossom	Pencader	Υ	N	Υ	N	-	Υ
PrC1/h16	Cilgwyn Bach	Pontyweli	N	-	Υ	N	-	Υ
SeC11/h1	Tir gerllaw Arwynfa	Saron	Υ	N	Υ	N	-	Υ
SeC15/h1	Tir gerllaw Maescader	Pencader	Υ	N	Υ	N	-	Υ
SeC18/h8	Tir yn Bryndulais	Llanllwni	Υ	N	Υ	N	-	Υ
PrC2/h2	Tir gyferbyn Brogeler	Llangeler	N	-	Υ	N	-	Υ
PrC2/h24	Tir y tu cefn i Dolcoed	Newcastle Emlyn	N	-	Υ	N	-	Υ
PrC3/h4	Maes y Bryn	Capel Iwan	Υ	N	Υ	N	-	Υ
PrC3/h27	Gerllaw Springfield	Waungilwen	Υ	N	Υ	N	-	Υ
Sec2/h1	Trem Y Ddol	Newcastle Emlyn	Υ	N	Υ	N	-	Υ
PrC1/h14	Cae Pensarn Helen	Llanllwni	N	-	Υ	N	-	Υ
Cluster 5								
SeC9/h2	Ger yr Ysgol	Llangadog	Υ	Υ	Not Likely	Υ	N	Υ
SuV27/h1	Tir ger Heol Pendref	Llangadog	Υ	Υ	Not Likely	Υ	N	Υ
PrC1/h11	Awel Y Mynydd	Llanfynydd	N	-	Υ	N	-	Υ
SuV28/h1	Tir gerllaw Bryndeilog, Tywi Avenue	Llandovery	Υ	Υ	Not Likely	N	-	Υ
SuV37/h3	Tir gyferbyn a Ysgol Gynradd Llangadog	Llangadog	Υ	Υ	Not Likely	N	-	Υ
SuV39/h1	Tir i'r Gogledd o Dan Y Crug	Llandovery	Υ	Υ	Not Likely	N	-	Υ
SuV12/h2	Gogledd Chwarter Llandeilo	Llandeilo	Υ	Υ	Not Likely	N	-	Υ
SeC15/h2	Tir gyferbyn Neuadd y Pentref	Cwmifor	Υ	N	Υ	N	-	Υ
Cluster 6								
SuV11/h1	Gerllaw Ysgol Gynradd Lacharn	Laugharne	Υ	Υ	Not Likely	Υ	N	Υ
SeC11/h2	Tir gerllaw i Cae Gardde	St. Clears	Υ	N	Υ	Υ	N	Υ
PrC3/h18	Cyn Fatri Menyn	St. Clears	Υ	N	Υ	Υ	N	Υ
SeC10/h2	Tir gerllaw a y tu cefn i Lon Dewi	Meidrim	Υ	N	Υ	Υ	N	Υ

POSA Page 70 of 84

				Outdoor Sports (Playing Field)			Play Space		
Site Ref	Name	Settlement	Access?	Ward Capacity	Shortfall created/ exacerbated?	Access?	Ward Capacity	Shortfall created/ exacerbated?	
SeC13/h4	Tir gerllaw i Teras Brittania	St. Clears	Υ	N	Υ	N	-	Υ	
SuV1/h2	Gerddi Lingfield	Whitland	Υ	Υ	Not Likely	N	-	Υ	
SeC12/h1	Tir gerllaw i Cefn Maes	St. Clears	Υ	N	Υ	N	-	Υ	
SeC12/h3	Tir gerllaw i Gwynfa, Heol yr Orsaf	St. Clears	Υ	N	Υ	Ν	•	Υ	
SeC18/h9	Tir yn Cae Glas	St. Clears	Υ	N	Υ	Ν	-	Υ	
PrC2/h28	Tir yn College-bach	Llangynog	N	-	Υ	N	•	Υ	
SeC19/h4	Tir yn Heol Llaindelyn	St. Clears	Υ	N	Υ	Ν	-	Υ	
PrC2/h3	Tir yn Fferm Nieuport	Pendine	N	-	Υ	N	-	Υ	
SuV59/h2	Tir yn Park View, Trevaughan	Whitland	Υ	Υ	Not Likely	N	-	Υ	
SuV59/h1	Tir yn Hufenfa Hendy-gwyn	Whitland	Υ	Υ	Not Likely	N	-	Υ	
SuV60/h1	Tir yn Woodend	Llanmiloe	Υ	Υ	Not Likely	N	-	Υ	
SuV5/h1	Tir oddi ar Stryd Clifton	Laugharne	Υ	Υ	Not Likely	N	•	Υ	
SeC17/h3	Tir oddi ar Heol Drefach	Meidrim	Υ	N	Υ	N	-	Υ	
PrC2/h22	Tir i'r Gogledd o Tafarn Cross Inn	Glandy Cross	N	-	Υ	N	-	Υ	
PrC2/h25	Tir y tu cefn i Maesglas	Glandy Cross	N	-	Υ	N	-	Y	
SeC18/h6	Tir y tu cefn i Heol yr Orsaf	St. Clears	Υ	N	Υ	N	-	Υ	
PrC2/h26	Tir y tu cefn i Talar-wen	Efailwen	N	-	Υ	N	-	Υ	
SeC17/h1	Tir i'r Gorllewin o Stryd Fawr	St. Clears	Υ	N	Υ	N	•	Υ	
PrC1/h8	Maes y Llewod	Bancyfelin	N	-	Υ	N	-	Υ	
PrC1/h3	Gogledd i Maes y Llewod	Bancyfelin	N	-	Υ	N	-	Υ	
SuV22/h1	Parc y Dressig	Whitland	Υ	Υ	Not Likely	N	-	Υ	
SuV23/h1	Pludds Meadow	Laugharne	Υ	Υ	Not Likely	N	-	Υ	

POSA Page 71 of 84

7.3. Devising Local Open Space Standards

The spatial disparity of common land between the north and south of the County is seen to heavily skew the assessment of ANGS. While the utility of such site should not be forgotten, onward standards (if set to be applied at a project level) may wish to consider a more flexible category which incorporates other accessible green features, particularly those on a smaller scale and within the urban environment. While representing a small portion of the overall open space standard mix, the accessibility for these has been purposefully suggested as "wherever possible" to encourage integration alongside other provisions to better promote multifunctional spaces which serve a wider range of amenity needs.

In reference to the above, the standards for ANGS recommended by NRW should continue to be considered in order to tackle the deficiencies seen in larger (+20ha) greenspaces. Nevertheless, the role in which the planning system (i.e., developer contributions towards large-scale ANGS) could have in assisting the delivery of these is not yet well exercised.

The current adopted standards for outdoor sports and play spaces remain ambitious. No further changes are recommended to the quantity of these open space categories, and these should continue to be objective for provision delivery. Nevertheless, it is proposed that onward accessibility standards should be in alignment with FIT standards to sure a variety of play provision suited for different ages. Additional auditing work is first needed to differentiate the types of play spaces in order to assess provision quantity and accessibility in line with these specific recommendations. Further requirements for accessing Playing Fields should also be incorporated, as suggested in TAN16.

The assessment of allotments appears too narrow in scope and such specificity does not align with the principle of multifunctionality (a common theme promoted within the rLDP and placemaking principles) nor the actual function/use of spaces on the ground. The inclusion of other open space assets (particularly those found in formal amenity such as community gardens and orchards) may broaden the types of open spaces eligible for meeting any onward standard (if adopted). Therefore, a more inclusive category of 'Community Growing Spaces' could be further considered. Similar to allotments, there is no standard accessibility benchmark for such spaces – whilst this decision would need to be made strategically, at least one provision per major residential area would seem a logical starting place⁶¹.

In promoting a holistic approach in determining provision sufficiency and benchmarking the requirement for future open space ambitions, the following Open Space standards are recommended for Carmarthenshire (Table 22). It should be noted that these standards are non-exhaustive given the various typologies and definitions of open spaces. However, while inclusive of those in which Council had previously adopted, they have been expanded to including an addition two categories given their evidential comprehensiveness (in providing health and wellbeing benefits and promoting sustainable development) and encompassing nature which ensures locally that users with a range of needs, abilities, and interests can be

POSA Page 72 of 84

⁶¹ With a particular focus on those areas with long waiting lists.

duly met. Ultimately, the alterations proposed to the current standards will further aid the implementation of the Play Sufficiency Duty within the planning context.

Table 22. Recommended Standards for the provision and accessibility of Public Open Spaces within Carmarthenshire. When considered collectively these standards help assess the capacity for existing open space provisions to facilitate play, exercise, learn, socialise, grow, and connect outdoors (in no hierarchical order) amongst individuals and communities.

	Quantity Stand	ard		
Open Space Category	Per 1000 Per Person People (ha) (m2)		Accessibility Standard	
Accessible Greenspace	0.25	2.5	Wherever possible	
Play Space	0.8	8	LAP: 1½-minute walk (100m) LEAP: 5-minute walk (400m) NEAP: 12½-minute walk (1,000m)	
Outdoor Sports	1.6	16	Playing Fields: 15-minute walk (1,200m)	
Community Growing Space	0.2	2	-	

While differently stated within paragraph 11.327 of the supporting policy text of PSD8 (2nd deposit version), it is advised that these standards should instead be adopted as part of the LDP through relevant supplementary planning guidance (i.e., following Council review and public consultation). However, it should continue to be recognised that any applied requirement for the delivery of additional open spaces could potentially create undesirable consequences, whether through standard integrated into planning requirements and/or delivered through alternative means such as strategic, stakeholder, or community driven response. These may include urban spawl/encroachment, reduced property/private garden size, and financial viability (including impacts upon affordable housing) (particularly, when combined with a number of other factors). Frequent monitoring and subsequent standard review should, therefore, be undertaken. Nevertheless, the human need for sufficient recreational opportunities – an important factor for attaining sustainable development - must not be underestimated.

POSA Page 73 of 84

8. Conclusion

Auditing revealed that Carmarthenshire has a high proportion of public open space. The determination of adequacy between the specific categories of open space provision found that twenty electoral wards met the current adopted standards for outdoor sports, and no ward met the adopted standards for play space provision. Nevertheless, approximately 86% of all existing residential homes were found to be within a fifteen-minute walk of a playing field, and approximately 42% were within a five-minute walk of a play space. The proposed rLDP allocations are likely to exacerbate the existing play space deficiency, and 114 (out of 187) would also result in a shortfall of outdoor sporting provisions. These results should be viewed holistically with further interrogation required at a project level.

Next Steps

Suggestions for any future iterations of this body of work include:

- Ground-truthing to better ensure the accuracy and validity of the audit. This should be done in unison with regular updates to the open space database;
- Detailed assessment of provision quality. This will ensure that the assessment of standards only consider functional provisions, and during onward implementation such information could help inform the delivery of restorative works. In the interim, issues of provision quality should continue to be addressed at the planning application level;
- Once auditing of site quality has been undertaken, there should be an additional assessment of quality in line with well-regarded standards, and further interrogation at a settlement level; and
- Stakeholder consultation should be conducted to ensure standards meet the
 demands created by communities (potentially through onward SPG). Further
 engagement could be held to disseminate assessment findings, devised any onward
 action plans, and facilitate conversation that highlights the well-being benefits
 associated with open space enjoyment.

POSA Page 74 of 84

Appendices

Appendix A: Background Policy & Strategic Framework

National: Background Policy & Strategic Framework

Active Travel (Wales) Act 2013

https://www.legislation.gov.uk/anaw/2013/7/contents

The Act requires local authorities in Wales to produce active travel maps and deliver year on year improvements in active travel routes and facilities. It requires highways authorities in Wales to make enhancements to routes and facilities for pedestrians and cyclists in all new road schemes and to have regard to the needs of walkers and cyclists in a range of other highway authority functions. As part of its commitment to make it easier to walk and cycle, the Council has prepared maps that identify current walking and cycling routes. These maps were created following public consultation as well as its own research in 2015. The routes identified on the maps meet current WG standards for walking and cycling routes in Wales.

Children and Families (Wales) Measure 2010

https://www.legislation.gov.uk/mwa/2010/1/contents

Measure to make provision about contributing to the eradication of child poverty; to provide a duty for local authorities to secure sufficient play opportunities for children (known as the Play Sufficiency Duty); to make provision about arrangements for participation of children in local authority decisions that might affect them; to make provision about child minding and day care for children; to make provision establishing integrated family support teams and boards; to make provision about improving standards in social work for children and persons who care for them; to make provision about assessing the needs of children where their parents need community care services or have health conditions that affect the needs of the children; and for connected purposes.

Countryside and Rights of Way Act (CRoW) 2000

https://www.legislation.gov.uk/ukpga/2000/37

This Act provides for public access on foot to certain types of land, amends the law relating to public rights of way, increases protection for Sites of Special Scientific Interest (SSSI) and strengthens wildlife enforcement legislation, and provides for better management of Areas of Outstanding Natural Beauty (AONB). There are 81 Sites of Special Scientific Interest (SSSI) in the county (excluding the area within the Brecon Beacons National Park) ranging in size from small fields to large areas of mountain sides and long rivers, covering a combined total of 17,088 hectares. They cover approximately 7.2 % of the county. SSSI are the best wildlife and geological sites in the country. They include habitats such as ancient woodland, flower-rich meadows, wetlands as well as disused quarries and support plant and animal species which are not often seen in the wider countryside. SSSIs are statutorily protected under the Wildlife & Countryside Act 1981 (as amended by the Countryside & Rights of Way Act 2000). Natural Resources Wales (NRW) has responsibility for identifying, notifying, and protecting SSSIs. The Act also places a duty on all highway authorities to produce a Rights of Way Improvement Plan (ROWIP) for their area. Carmarthenshire has six Local Nature Reserves (LNRs). LNRs are designated by local authorities and are places which support a rich variety of wildlife or geological features, and which are important to local people, by enabling contact with the natural environment. The LNRs in the county are managed with the conservation of wildlife as the top priority. They are Pembrey Burrows and Saltings, Ashpits Pond and Pwll Lagoon, North Dock Dunes, Morfa Berwick (all in the Llanelli coastal area), Carreg Cennen and Glan-yr-Afon, Kidwelly.

POSA Page 75 of 84

Future Wales: The National Plan 2040 (2021)

https://gov.wales/future-wales-national-plan-2040

Future Wales is the development plan for Wales. It influences all levels of the planning system in Wales and shapes both Strategic and Local Development Plans prepared by councils and national park authorities. It addresses key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems, and improving the health and well-being of communities.

Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard (Wales) (2015)

https://www.fieldsintrust.org/Upload/file/Guidance/Guidance-for-Outdoor-Sport-and-Play-Wales.pdf

This provides guidance on the planning and design of outdoor sport, play and informal space, formulated on 'a broad recommendation that 6 acres (2.4 hectares) of accessible green space per 1,000 head of population enables residents of all ages to participate'. The document was revised to reflect policy changes including the National Planning Policy Framework and now includes recommendations on the provision of amenity and natural green space.

Local Development Plan Manual (Edition 3) 2020

https://gov.wales/development-plans-manual-edition-3-march-2020

The Manual proposes a more integrated approach to incorporating the sustainability appraisal, explains changes relating to candidate and alternative site procedures, as well as the tests of soundness, and expands the advice on plan review and revision.

People, Places, Futures: The Wales Spatial Plan 2008 (update)

 $\underline{https://gov.wales/sites/default/files/publications/2019-05/people-places-future-the-wales-spatial-planupdate-2008.pdf}$

The Wales Spatial Plan (WSP) provides an overarching policy context for spatial planning and development in Wales by establishing cross-cutting national priorities over the next 20 years. Carmarthenshire is situated within three of the six sub areas identified in the WSP.

Planning (Wales) Act 2015

http://gov.wales/topics/planning/legislation/planning-wales-act-2015/?lang=en

This Act aims to modernise and improve the planning system to facilitate the delivery of homes, jobs, and infrastructure. It also seeks to:

- reinforce the role of the Welsh Government as the active stewards of the planning system in Wales;
- promote a cultural change in planning to help make it more positive and support appropriate development more effectively; and
- promote partnership working between Local Planning Authorities.

The below is also noted in terms of potential implications:

POSA Page 76 of 84

- Introduction of a National Development Framework (NDF) land-use planning issues at the national level, identifying key locations for infrastructure development and setting the national framework for planning.
- Introduction of Sub-Regional Plans Strategic Development Plans (SDPs) with specific reference made to the Cardiff, Swansea and the A55 corridor.
- Retention of Local Development Plans however these will need to be reviewed to ensure that they
 are consistent with the National Development Framework (and SDPs where appropriate).
- Increased powers for the Welsh Ministers, whilst in some circumstances applicants will be able to apply directly to the Welsh Government.

The LDP will need to be reviewed and prepared in line with this Act as well other primary and secondary legislative documents.

Planning Policy Wales: Edition 11 (2021)

https://gov.wales/planning-policy-wales

Planning Policy Wales (PPW) is the national land-use planning policy document for Wales. It is used by Local Planning Authorities to inform policies and land-use allocations LDPs and it is a material consideration for decision makers in determining individual planning applications. PPW sets out the land use policies of the Welsh Government and provides the context for land use planning in Wales. The policy is supplemented by Technical Advice Notes (TAN), circulars, and policy clarification letters, and together they provide our national planning policy framework.

PPW Technical Advice Note 12: Design (2016)

https://gov.wales/technical-advice-note-tan-12-design

The purpose of TAN12 is to equip those involved in the design of development with advice on 'Promoting sustainability through good design' and 'Planning for sustainable buildings' and how this may be facilitated through the planning system. Good design requires a collaborative, creative, inclusive, process of problem solving and innovation - embracing sustainability, architecture, place making, public realm, landscape, and infrastructure. TAN12 emphasises that a holistic approach to design requires everyone involved in the design process to focus from the outset on meeting a series of objectives of good design. These including ensuring ease of access for all; promoting sustainable means of travel; ensuring attractive, safe public spaces; achieving environmental sustainability; sustaining or enhancing local character

PPW Technical Advice Note 16: Sport, Recreation and Open Space (2009)

https://gov.wales/technical-advice-note-tan-16-sport-recreation-and-open-space

TAN16 sets out guidance regarding planning for sports, recreation, and open space provision as part of new development proposals. It provides advice relating to this area including on the preparation of Open Space Assessments, the keeping of existing facilities, the provision of new facilities and the planning for allotments and spaces for children's and young people's play. Additionally, TAN16 discusses development management issues regarding the design of facilities and spaces, and noise and accessibility, and also considers how planning agreements can help to ensure the provision and maintenance of facilities

PPW Technical Advice Note 6: Planning for Sustainable Rural Communities (2010):

https://gov.wales/technical-advice-note-tan-6-planning-sustainable-rural-communities

POSA Page 77 of 84

TAN6 provides guidance on how the planning system can support sustainable rural communities. It provides advice on areas including sustainable rural communities and economies, rural affordable housing, rural enterprise dwellings, one planet developments, sustainable rural services, and sustainable agriculture.

Sustainable Management of Natural Resources and our Well-being (2019)

https://gov.wales/sustainable-management-natural-resources-guide

This Guidance relates to improving the social, economic, environmental, and cultural well-being of Wales through taking an ecosystem approach to managing natural resources.

Well-being of Future Generations (Wales) Act 2015

https://business.senedd.wales/mglssueHistoryHome.aspx?IId=10103

The key purposes of the Act are to:

- Set a framework within which specified Welsh public authorities will seek to ensure the needs of the present are met without compromising the ability of future generations to meet their own needs (the sustainable development principle);
- Outline well-being goals which those authorities are to seek to improve for the wellbeing of both present and future generations;
- Set out how those authorities are to show they are working towards the well-being goals;
- Put Public Services Boards (PSB) and local well-being plans on a statutory basis and, in doing so, simplify current requirements as regards integrated community planning, and
- Establish a Future Generations Commissioner for Wales to be an advocate for future generations who will advise and support Welsh public authorities in carrying out their duties under the Bill.

The LDP must have regard to the 7 well-being goals set out within the Act:

- A prosperous Wales;
- A resilient Wales:
- A healthier Wales:
- A more equal Wales;
- A Wales of cohesive communities;
- A Wales of vibrant culture and thriving Welsh language; and
- A globally responsible Wales.

Regional: Background Policy & Strategic Framework

Natural Resources Wales Area Statements (2020)

https://naturalresources.wales/about-us/area-statements/?lang=en

POSA Page 78 of 84

Produced as a collaborative response to the Natural Resources Policy, published by the Welsh Government in 2017. Each Area Statement outlines the key challenges facing that locality, opportunities to meet those challenges, and how we can better manage our natural resources for the benefit of future generations. The themes for South West Wales are reducing health inequalities; ensuring sustainable land management reversing the decline of, and enhancing, biodiversity; and (Cross-cutting theme) Mitigating and adapting to a changing climate. Whereas the themes for the marine area statement are building resilience of marine ecosystems; nature-based solutions and adaptation at the coast; and making the most of marine planning.

Local: Background Policy & Strategic Framework

Cabinet Vision Statement 2022–2027 (CCC)

https://www.carmarthenshire.gov.wales/home/council-democracy/strategies-and-plans/cabinet-vision-statement-2022-2027/

As well as tackling climate change and poverty, the Cabinet's vision statement includes strengthening the economy and increasing prosperity, and investing in housing, education, culture, infrastructure, and the environment to make a real difference to people's lives.

CCC: Corporate Strategy 2022-2027

https://www.carmarthenshire.gov.wales/media/1231822/corporate-strategy-2022-27.pdf

The Corporate Strategy sets out the Council's strategic priorities and aspirations and outlines what it plans to do to achieve its vision for Carmarthenshire over the next five years. At the heart of this approach is integration and collaboration across the Council and with our stakeholders, and our focus going forward will be on *Developing Carmarthenshire*, *Together: One Council; One Vision; One Voice*.

Carmarthenshire Economic Recovery & Delivery Plan (2021)

https://democracy.carmarthenshire.gov.wales/documents/s51856/Report.pdf

This Economic Recovery Plan which identifies some 30 actions to support the recovery of the Carmarthenshire economy from the social and economic impacts of the COVID-19 pandemic and Brexit. It sets out the authority's priorities for supporting Business, People and Place. With this support Carmarthenshire's economy can recover as quickly as possible to become one which is more productive than before, more equal, greener, healthier, and with more sustainable communities.

Carmarthenshire Family Support Strategy 2018–2023

This strategy sets out how the Authority will develop and deliver early intervention services to support Carmarthenshire's children, families, and young people at any point in a child's life, from the early years through to the teenage years.

Carmarthenshire Local Development Plan 2006-2021 (Adopted December 2014):

http://www.cartogold.co.uk/CarmarthenshireLDP/english/text/00 Contents.htm

POSA Page 79 of 84

The Carmarthenshire Local Development Plan (LDP) provides the framework for all future development within the County until 2021 (excluding Brecon Beacons National Park). The LDP shapes future investment opportunities and infrastructural improvement programmes and guides the determination of any proposals or planning applications, unless material considerations indicate otherwise. The LDP is accompanied by a Sustainability Appraisal (SA) together with Habitats Regulations Assessment (HRA). A series of Supplementary Planning Guidance (SPG) was also developed to elaborate and consolidate upon the policies and provisions within the Plan; these are:

- Affordable Housing;
- 2. Planning Obligations;
- 3. Caeau Mynydd Mawr;
- 4. South Llanelli Planning and Development Brief;
- 5. Pibwrlwyd Planning and Development Brief;
- 6. Adaptation and re use of rural buildings for residential use;
- 7. Welsh language;
- 8. Leisure and Open Space requirements for new developments;
- 9. Nature conservation and biodiversity;
- 10. Archaeology and development:
- 11. West Carmarthenshire Planning and Development Brief; and
- 12. Llandeilo Northern Quarter Planning and Development Brief.

On the 10th of January 2018, the Council resolved to prepare a revised LDP for Carmarthenshire. Once adopted the proposed LDP will supersede the Adopted LDP.

Carmarthenshire Local Well Being Plan 2018-2023 - Public Service Board

 $\frac{\text{https://democracy.carmarthenshire.gov.wales/documents/s32300/PSB\%20Annual\%20Report\%202019.pd}{f}$

The Well-being of Future Generations Act 2015 puts a well-being duty on specified public bodies across Carmarthenshire to act jointly and establish a statutory Public Services Board (PSB). Carmarthenshire PSB was established in May 2016 and is tasked with improving the economic, social, environmental, and cultural well-being of Carmarthenshire. It must do so by undertaking an assessment of well-being in the County and then preparing a county Well-being Plan to outline its local objectives, the steps it proposes to take to meet them and how they contribute to the achievement of the well-being goals.

Carmarthenshire Nature Recovery Plan 2020-2030

The Nature Recovery Plan produced by the Carmarthenshire Nature Partnership lists the Section 7 species and habitats found in the county and, as such, informs local planning policy. It reflects the national objectives at a local level and considers how these objectives are addressed in Carmarthenshire, the challenges, and opportunities of meeting these objectives, and informs the future work of the partners who have a common interest in protecting and enhancing our natural environment.

Carmarthenshire's Well-being Objectives (as contained within Carmarthenshire County Council - Corporate Strategy 2018–2023)

Following consultation, the Council prepared a set of Well-being/Improvement Objectives. These Objectives contribute significantly to the achievement of the National Well-being Goals and recognises that more can be done on a local government level. There are associated action plans for each of the 13 objectives (under fiver key themes), these are:

Start well

1. Help to give every child the best start in life and improve their early life experiences

POSA Page 80 of 84

2. Help children live healthy lifestyles

Live well

- 3. Support and improve progress, achievement, and outcomes for all learners
- 4. Tackle poverty by doing all we can to prevent it, help people into work and improve the lives of those living in poverty
- 5. Create more jobs and growth throughout the county
- 6. Increase the availability of rented and affordable homes
- 7. Help people live healthy lives (tackling risky behaviour and obesity)
- 8. Support community cohesion, resilience & safety

Age well

9. Support older people to age well and maintain dignity and independence in their later years

In A Healthy, Safe & Prosperous Environment

- 10. Look after the environment now and for the future
- 11. Improve the highway and transport infrastructure and connectivity
- 12. Promote Welsh Language and Culture

Corporate governance

13. Better Governance and use of Resources

Please note that these have been updated within the most recent Corporate Strategy.

Moving Forward in Carmarthenshire: the next 5-years (2018)

https://www.carmarthenshire.gov.wales/media/1212982/moving-forward.pdf

The Council has identified 98 priority projects, schemes, or services that it wants to deliver over the next five years to make Carmarthenshire "the best place to live, work and visit". The Council will be investing in key areas as it strives to improve economic, environmental, social, and cultural well-being in the county.

Moving Rural Carmarthenshire Forward (2019) (Carmarthenshire County Council)

https://www.carmarthenshire.gov.wales/media/1219667/moving-rural-carms-forward-report-final.pdf

This wide-ranging strategy was developed to help identify and focus regeneration within rural communities in Carmarthenshire.

Rights of Way Improvement Plan 2019-2029 (Carmarthenshire County Council)

https://www.carmarthenshire.gov.wales/media/1222043/rowip-english.pdf

Developed in accordance with Section 60(3) of the Countryside and Rights of Way (CRoW) Act (2000), the Rights of Way Improvement Plan (ROWIP) is a decennial document which details the Authority's plan for the strategic management, development, and improvement of the County's Public Rights of Way (PRoW) network. It is critical in depicting the direction and scale of future work on access to the countryside, providing a long-term view of policies and actions. This updated the previous ROWIP originally published in 2008.

POSA Page 81 of 84

Appendix B: Sources and Attribution Statements

Dataset (creation date)	Date Obtained	Source	Attribution Statement	Notes
OS Open Greenspace	05/06/2023	https://beta.ordnancesurvey.co.uk/products/os-open-greenspace	Contains OS data © Crown Copyright [and database right] (2023)	This dataset has used to determine any differences between our existing datasets. Those different features (total of 57) were reviewed individually and, if deemed appropriate, incorporated into the relevant category.
NRW Open Access - Dedicated Forests (26 July 2016)		https://datamap.gov.wales/layers/inspire-nrw:NRW PUBLIC FOREST 2014	Contains Natural Resources Wales information © Natural Resources Wales and Database Right. All rights Reserved. Contains Ordnance Survey Data. Ordnance Survey Licence number 100019741. Crown Copyright and Database Right.	
NRW Open Access – Open Country (21 July 2016)	01/06/2023	https://datamap.gov.wales/layers/inspire-nrw:NRW OPEN COUNTRY 2014	Contains Natural Resources Wales information © Natural Resources Wales and Database Right. All rights Reserved. Contains Ordnance Survey Data. Ordnance Survey Licence number 100019741. Crown Copyright and Database Right.	Used to inform
NRW Open Access – Other Statutory Access Land (26 July 2016)		https://datamap.gov.wales/layers/inspire-nrw:NRW OTHER STATUTORYLAND 2014	Contains Natural Resources Wales information © Natural Resources Wales and Database Right. All rights Reserved. Contains Ordnance Survey Data. Ordnance Survey Licence number 100019741. Crown Copyright and Database Right.	
NRW Open Access – Registered Common Land (21 April 2017)		https://datamap.gov.wales/layers/inspire-nrw:NRW COMMON LAND 2014	Contains Natural Resources Wales information © Natural Resources Wales and Database Right. All rights Reserved.	

POSA Page 82 of 84

			Contains Ordnance Survey Data. Ordnance Survey Licence number 100019741. Crown Copyright and Database Right.	
CCC Property Holdings		Internal	na	Used to determine the accessibility of open spaces.
Local Authorities - High Water mark	05/06/2023	https://datamap.gov.wales/layergro ups/inspire- wg:LocalAuthorities/metadata detai l	Contains OS data © Crown Copyright [and database right] (2023)	
National Parks		https://datamap.gov.wales/layers/inspire-nrw:NRW NATIONAL PARK/metadatadetail	Contains Natural Resources Wales information © Natural Resources Wales and Database Right. All rights Reserved. Contains Ordnance Survey Data. Ordnance Survey Licence number 100019741. Crown Copyright and Database Right.	
Electoral Wards Wales May 2022		https://datamap.gov.wales/layers/g eonode:electoral wards wales ma y 2022	Contains OS data © Crown copyright and database right 2022.	
National Trust Open Data: Land - Always Open (4 th July 2022)	0	https://open-data-national- trust.hub.arcgis.com/datasets/3511 d41489ae442c877db40698b3b0c9 		This layer shows the approximately 114,000 hectares of National Trust land that the public has access to on foot only (last updated: May 2017) — either by right (in the case of designated 'Access Land' under the Countryside (Rights of Way) Act 2000 (CRoW)) or by permission from the National Trust. Rights over Access Land are limited by CRoW and may be further restricted or excluded due to particular land management reasons.

POSA Page 83 of 84

National Trust Open Data: Land - Limited Access (4 th July 2022)	https://open-data-national- trust.hub.arcgis.com/datasets/bb6f7 e22e2e74c70b350eb0b2135ed08 0/explore?location=51.886220%2C- 4.009765%2C14.57		This layer shows the approximately 19,300 hectares of National Trust land where the public has limited access (last updated: May 2017). This data shows areas where access is restricted for at least one of the following reasons:
			 The land is enclosed as part of a National Trust Estate. Access is restricted to a dense path network. There are specific reasons the land is not Always Open e.g. Safety concerns
Euro Global Map (February 2023)	https://www.mapsforeurope.org/access-data	Ordnance Survey data: © Crown copyright and database right [2023] OS OpenData is free to use under the Open Government Licence (OGL)	This dataset includes Intellectual Property from European National Mapping and Cadastral Authorities and is licensed on behalf of these by EuroGeographics. Original dataset is available for free at https://www.mapsforeurope.org . Terms of the licence available at https://www.mapsforeurope.org/licenc e. All attribution statements can be found at https://www.mapsforeurope.org/attributions .

POSA Page 84 of 84