

2ND DEPOSIT REVISED
CARMARTHENSHIRE LDP
2018 – 2033

SITE ALLOCATION – PRC3/H6
SUPPORTING STATEMENT:

LAND ADJOINING, MAES IFAN,
MAESQUARRE ROAD, BETWS,
AMMANFORD

MR. C SMITH & MR. A ROBERTS

APRIL 2023

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BACKGROUND

Further to the call for candidate sites as part of the initial round of consultation in 2018 together with the supporting statement submitted as part of the site allocation process in 2020 which have both formed part of the initial stages of the Carmarthenshire Local Development Plan (LDP) for the period 2018 – 2033.

The submission seeks to provide further supporting information in respect of the site that was initially promoted and since supported by the Authority to form part of the latest focussed changes under the 2nd Deposit Revised LPD.

Consequently, the following update is provided to help support the specific allocation in identifying the sites adherence to the strategic aims of the plan as well as its adherence to the test of soundness set against the requirements of National Policy. Highlighting in turn the progressive and continued work that has been undertaken to align the scheme with that of the adjoining allocation previously put forth, adopted, and now developed as part of the current LDP and decision-making tool for Carmarthenshire which in turn seeks to introduce the next phase of development at the site.

As a consequence of the above, the following statement should be read in conjunction with the 'Historic Supporting Submissions and Planning History' for the overall site:

- Carmarthenshire LDP (2006 – 2021) - Initial Consultation - 2011
- Maes Ifan Phase I – Outline planning Approval – Quarter 3 2012
- Carmarthenshire LDP (2006 – 2021) – Adoption - Quarter 4 2014
- Maes Ifan Phase I - Reserved Matters Approval – Quarter 1 2015
- Maes Ifan Phase I - Offsite infrastructure Approval – Q1 2015
- Carmarthenshire LDP (2018 – 2033) – Candidate Site Supporting Statement – Quarter 2 2018
- Carmarthenshire LDP (2018 – 2033) – Site Allocation Supporting Statement – Quarter 1 2020
- Carmarthenshire LDP (2018 – 2033) – Viability Information – Quarter 4 2020

The details of which, whilst extensive are key in highlighting the work undertaken to prove viability and deliverability of the site to help meet the strategic aims of the plan. (Full documentation attached separately)

On the basis of the above and alongside the detailed contained within the submission, the site is one that is considered appropriate given the following demonstration of adherence, feasibility and deliverability of the site within as part of the promoted plan.

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DESCRIPTION OF THE SITE

The site the subject of this representation is an area consisting of some 1.6 hectares of agricultural land within the village of Betws, near Ammanford. Specifically, the site represents a slightly sloping area of land from northeast to south west which is encompassed to the north and east of the site by wooded embankments and dense hedgerows which provides strong physical enclosures. To the southern and western boundaries of the site there exists stock fencing and hedgerows with intermittent trees, which will be retained in any future development. An overview of the site can be seen in appendix 1 and 2.

The site consists of primarily improved agricultural grassland which is grazed by sheep and horses. The site itself has a low level of variation in species assemblage given the agricultural improvements of the past, where there are no known areas of particular importance to nature conservation which is supported by the ecological surveys previously commissioned.

In relation to surrounding residential form the site is primarily enclosed by residential blocks with the Charles Church site to the North and that of the properties which back onto the site from Heol Waun Dwfn to the South, together with the properties along Maesquarre Road and the most recent development of the Maes Ifan scheme to the West, which form defensible boundaries to the site.

In addition, and in conjunction with the completion of Maes Ifan, part of the promoted site has also been developed to support the infrastructure requirements of the former development by means of drainage and attenuation, which in turn provides the opportunity for the promoted site.

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ADHERANCE TO THE LDP STRATEGY AND POLICIES

In order to continue to obtain support for the sites allocation, in terms of its overall adherence to the strategies and policies put forth by the Council as part of the 2nd Deposit Revised LDP, the following policy analysis has been undertaken to assist in reinforcing the allocations adherence to the main aims of the plan:

Strategic Policy SP3 - 'Sustainable Distribution – Settlement Framework'

The identification of Ammanford and its surrounding villages as sustainable growth areas as part of the Tier 1 – Principle Centre classification is supported. The ability of the promoted allocation to help contribute to that of the overall aims of the plan in providing in excess of 8,822 new homes to what has been identified as a provision of 9,704 homes alongside the delivery of 1,900 new affordable homes is welcomed.

Policy HOM1 – 'Housing Allocations'

Seeks to satisfy the housing land requirements for the County through the distribution and identification of sustainable centres for which the promoted site is considered to be one of.

The site is located in an area where larger developments have historically been developed to provide much needed housing for supporting the expanding and thriving community, where given recent investment into schools and services the site would only seek to enhance the vibrancy and community of the area.

The site is currently located directly adjacent to the existing settlement limits as part of the existing adopted LDP to three of its extremes, where subject to its continued inclusion in the 2nd Deposit Revised LDP the site will provide a consolidation and rounding off this part of the settlement and is not considered to be of detriment to the character and appearance of the settlement nor its environment. Rather it is considered that the allocation would provide a cumulative contribution towards the soundness of the plan in seeking to meet the 2nd Deposit Revised LDP housing objectives.

The ability of the site to deliver the 18 homes identified is further justified as part of the viability and delivery sections below, albeit the initial designs indicate that there is scope to increase the density should such a requirement be advantageous to the success of the plan, whilst still respecting the site's wider context and integration in the settlement.

Strategic Policy SP5 – 'Affordable Homes Strategy' & Policy AHOM1 – 'Provision of affordable homes'

The policies surrounding Affordable Housing are understood and supported as being one of the key drivers in the success of the LPD given the current shortfall of accommodation for younger people and families. In seeking to provide this much needed resource it is recognised that balancing the demographics of the County through the retention of younger adults elsewhere, can in turn seek to address some of the issues which could be perceived from an aging population.

The latest policy albeit modified since the previous iteration of the plan is still recognised as key to the future generations act and as being imperative in the delivery of the LDP as a whole. Whilst the slight reduction in terms of percentage requirements is down from 15% to that of 10% - 12% subject to the final density of the site, the scheme is one given its need to provide such provision is one through such a policy can be considered to have a positive impact. Not just initially but in perpetuity given the controls available to the Authority to impose specific legal agreements and land charges to prevent any future loss of the property to the open market and consequently outside its intended purpose.

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In addition to this and whilst not strictly classed as affordable housing, it is recognised that the ability to provide a mix of house types throughout the development as well as the potential increased density will help assist people of varying circumstances from those seeking affordable homes, first time buyers, young professionals, families to that of those looking for a more executive style property. In turn it is recognised that such developments can help create a greater sense of place and help maintain a sustainable community.

Strategic Policy SP12 – ‘Placemaking and Sustainable Places’

The site enjoys close connections with Ammanford where there is a range of services in the immediate area, including supermarkets, newsagents and primary schools these services are further supplemented by chemists, butchers, banks, takeaways and public houses within the town itself, which is a short cycle and walk away, to which there are also regular bus services. The above factors consequently support the site in form of accessibility to services in a sustainable means as promoted by the LDP in conjunction with TAN12 (Design) and that of Strategic Policy 17 ‘Transport and accessibility’.

In turn the ability to access these services in a sustainable manner is far more likely to continue to promote and support the town itself and the jobs and business which are key to the town and its population which without would severely affect the economic sustainability of the areas and detract from the town and its local distinctiveness in line with policy ‘RTC1 Protection of local shops and facilities and the Future Generations Act 2015.

Policy PSD1 – Sustainable and High-Quality Design

The above policy together with the requirements as set out in TAN 12 (Design) is supported as any forthcoming proposals for the site would seek to be compatible in the context of the character and capacity of the area in paying regard to local distinctiveness, as well as seek to reduce energy demand through design and provision of renewable technologies.

In order to help set the aspirations of the site against what is already evident in phase I concepts of the complimentary house types has been provided to highlight the adherence to this.

Strategic Policy – SP 14: Maintaining and Enhancing the Natural Environment

In seeking to ensure the site is one that adheres to the above requirements and wider legislation in terms of biodiversity and that of the natural environment the following requirements together with the policies that follow are believed to be key in the success of the site.

Since the initial works in respect of Phase I were considered, various environmental surveys have been commissioned to help understand and appreciate the context of the site and more specifically the biodiversity within and surrounding the promoted allocation. With the next phase 1 habitat survey currently scheduled to help to provide an update and help inform the forthcoming examination given the survey data is now due to be refreshed since the last round of consultation in 2020.

On the basis of those historic reports and that of the ongoing assessments it is evident that the scheme at Maes Ifan is not necessarily rich in forms of biodiversity across the site, given the quality of the land and that of the continued agricultural grazing and silage production.

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However, the site is one that has the ability to be enhanced through the creation of habitat on site and identifying key target areas such as that of the attenuation pond already in existence to help provide an overall improvement to the site. In addition, the protection and enhancement of the boundaries which whilst extensive in some part does have potential to be improved particularly along the southern sections which in turn will create greater connectivity for species and important landscape mitigation to dovetail with other policies and requirements. Therefore being able to maintain and enhance biodiversity, and promote the resilience of ecosystems in line with NRW's section 6 duty.

Habitats Regulations Assessment Addendum Report

In response to the addendum of the HRA which has been updated as a direct result of NRW's Compliance Assessment of Welsh River Special Areas of Conservation in respect of phosphate guidance.

The scheme at Maes Ifan is one that is not only able to adhere to the prevailing guidance, yet is one that can seek to address the concerns further by developing the site and removing the pressures on those areas which were previously promoted as part of the publication of the 1st Deposit of the LDP.

Albeit compliance not to compound issues elsewhere is understood and recognised the development is already being assessed and designed to ensure such measures are in line with CCC's Nutrient Budget Calculator from the outset to help ensure compliance across the plan and that of the National Site Network.

Strategic Policy SP17 – 'Transport and accessibility' & Policy TRA5 – 'Highways and access standards in development'

As part of the master planning for the whole area in my client's ownership, there has always been a requirement to ensure that the latter phases of development and that of future land allocations could come forward without any impediment to highway safety or deliverability. As a consequence of this the necessary access and services are already in place at the boundary of the site ready to compliment the next stage of development.

Whilst varying degrees of density has been discussed throughout the report, ultimately there will be the need to discuss the levels of traffic generation with the Highways department in terms of capacity for those seeking to access the site and how in turn highway safety can be maintained or even improved through the final design and associated Section 278 agreements in respect of any forthcoming scheme.

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INTEGRATED SUSTAINABILITY APPRAISAL

Having considered the details provided as part of the LPA's Integrated Sustainability Appraisal (ISA) in relation to the site and whilst not disagreeing with the majority of the conclusions therein. There is reference that the:

'proposed site conflicts with several ISA Objectives. Mitigative policies set out within the rLDP are expected to resolve these issues, however, it will be necessary to ensure these are correctly implemented and appropriately monitored, subject to planning requirements'.

On the basis of the above and to provide assurances to how the development can be tailored to overcome these matters. The following information seeks to offer further clarity where comments have been raised whether as an amber or pink classification for completeness. Thereafter offering mitigation to help support the continued inclusion of the site. Specifically, the documentation which is reproduced in appendix 3 below highlights the following areas which would benefit from mitigation:

- ISA 2 – Biodiversity
- ISA3 – Air Quality
- ISA 5 - Water
- ISA 7 – Soil
- ISA 9 - Landscape

In respect of 'ISA 2 – Biodiversity' the allocation is one that has already sought to understand the context of this given its ongoing and historic assessments of biodiversity to support both this promotion and the former completed scheme. Consequently, the baseline information and knowledge of the site is therefore already well understood and whilst is evident from those reports and the information alluded to in the policy section above that the site is relatively limited in this regard. There are opportunities not so much as to mitigate given the nature of the scheme yet more so to enhance what is already in existence. In seeking to develop the scheme further it is appreciated that this will be a key area of consideration whereby through an environmentally site led layout and alongside construction environmental management plans and that of initial and ongoing environmental management plans there is the ability to ensure adequate mitigation can be delivered.

As part of the specific commentary when set against 'ISA 7 – Soil' it is stated that "This site does not utilise previously developed land, however it otherwise preforms well against the sustainability framework". In response to this it must be noted that within the confines of the site there is evidence of certain former developments having taken place in conjunction with the adjacent housing development of Maes Ifan. Part of these works relate to the compound and storage areas that were apparent on the site to facilitate the development albeit a temporary arrangement. In addition, and more of a permanent feature on the site, is that of the construction of an attenuation basin and associated drainage works to discharge surface water from the adjacent site of Maes Ifan under planning application E/31546 which was approved and implemented in the summer of 2015, where the area is also anticipated to be utilised as part of any future requirement for the promoted site.

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Whilst reference has been made to ISA 3 – Air Quality the site is one which wouldn't necessarily score any better or worse should the scheme be located elsewhere in the County given how the proposal as well as others would need to adhere to the latest prevailing guidance in terms of sustainable construction and that of the reduction of emissions given the renewable technologies that would be required in line with building regulations. It is however recognised that there are pockets of land closer to shops and services which may reduce car journeys, yet the site is one that is well served by public transport and also within walking distance of the town and surrounding amenities not to be solely reliant on private vehicle journeys.

ISA 5 – Water. In respect of the schemes alignment with other strategic principles and in particular that of it being outside of any recognised flood risk zones following the Stage 1 Strategic Flood Consequences Assessment (SFCA) it is not necessarily understood why an amber scoring had been set against this element. Further consideration has also been given to the latest prevailing advice on phosphates where again the site is one which is compliant in this regard. Should however the query relate to the need for appropriate sustainable urban drainage systems (SuDS) and attenuation to be in place then this to a degree is already in place given the previous approval and construction of an attenuation pond on site which has capacity and ability to be integrated alongside other improvements across the site in line with the latest prevailing guidance and adherence to feedback at the appropriate time from the SuDS approving body (SAB)

ISA 9 – Landscape. Whilst it is recognised that this element relates once again to the site not being of previously developed land in many instances, there is also the consideration of the site in relation to its wider context within the landscape and its interaction with that of the existing build form. In order to seek to address and mitigate this, it is anticipated that a fully developed landscape and environmental management plan can be developed to support any forthcoming planning application. Therefore, providing a comprehensive planting strategy for the site in particular the southwest boundaries and that of the areas surrounding the existing attenuation pond, can help link and support ISA 2 in respect of the biodiversity across the site creating a greater form of habitat creation exceeding the current on-site situation in form of a positive overall net gain. All of which can be controlled through appropriate conditions and schemes such as a landscape and environmental management plan that would be controlled by the authority.

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VIABILITY

The site the subject of this allocation is one that in terms of viability has been proven to stack up, given the previously developed scheme at Maes Ifan. Whilst the site will undoubtedly have its own individual characteristics and differences when compared against the completed scheme the principles remain the same.

In seeking to understand and evidence this further my clients have, as can be found in the supporting background information of 'Historic Supporting Submissions and Planning History' which in part is reproduced below. Confirmed the following to the Authority in November 2020 to support the viability of the scheme:

1. That the site is primarily 'greenfield' (rather than 'brownfield') in nature.
2. That housing will be built to reflect the need in the emerging Local Housing Market Assessment in terms of dwelling types / sizes.
3. 50% of any affordable dwellings provided on-site (on mixed market and affordable housing sites) will be for social rent, and 50% intermediate tenure.
4. That the value of open market properties is between £190 psf and £213 psf according to the size and location of the site, and the number of dwellings suggested in the Deposit Revised LDP under Policy HOM1.
5. That S.106 contributions for sites comprising 5 or more dwellings for elements other than affordable housing will be between £2,000 per dwellings and £6,500 per dwelling depending on site size.

Albeit clarity is provided in respect of the following statements, given the changes since that time:

Statement 2 - Additional market research undertaken in respect of the site following the pandemic has indicated that many people are now opting for a more modest home with minimal up-keep to allow them to spend time with friends and families as well as enjoying greater travel which was not necessarily the case pre pandemic. Consequently, creating a greater demand for a difference in terms of housing type.

Whilst the details referred to will need to be developed and debated as part of any future planning application. Initial consideration as to the evolution of the layout has been provided to highlight how in turn the scheme could be developed to meet these requirements whilst also helping with housing numbers and completions over the plan period.

Statement 4 - It is important to note that since the pandemic the demand on housing, particularly in areas such as Carmarthenshire has only sought to increase alongside that of materials and development costs which in turn has meant that the likely value of the properties would now stand at circa £265 - £270 psf which whilst considered to be a significant increase is something that is unfortunately relative to housebuilding across the country.

Additionally, many other schemes will have seen development costs increase as a consequence of National Standards for Sustainable Drainage in recent years. However, the site is one that already has the benefit of the main infrastructure in place to support the scheme and consequently doesn't impact the overall viability of the scheme.

Finally, and whilst not appropriate to provide the specifics on detailed figures and overall profitability of the adjacent site developed at Maes Ifan as part of this submission. The information is something that can be made available confidentially on request, should the Inspector or Authority require further assurances beyond the visible delivery of phase I, given how a similar contract for delivery would be structured.

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DELIVERABILITY

As can be evidenced from the information contained there are no significant obstacles or constraints to the delivery of the development, given the site is within the complete ownership of my client and consequently there are no third parties owners, easements or other title impediments that could prevent the delivery of this site.

The site has no physical constraints or obstructions that would prevent its overall development and does not contain or adjoin any of the following:

- Protected trees or hedgerows;
- Watercourses;
- Power lines or other utilities;
- Ecological features;
- Ground conditions or contamination; or
- Listed buildings or other protected structures.

In order to support this further the constraints plan produced by the Council and their independent consultants tasked with undertaking the study, identifies the land as being free of any potential encumbrance in terms of the viability/delivery of the site. Whilst certain factors have been raised with respect to the sustainability appraisal it is considered that the mitigation alluded to above is something that can be controlled via appropriate condition at the time of the planning application.

As part of the candidate site process undertaken in 2018 the initial assessments identified the site as being capable of delivery in the short term between 2021 – 2024. However, whilst it is acknowledged that there has been a change to the programme of adoption and consequently a knock-on effect to that of the site trajectory published my client is confident that the scheme in line with recent changes to the consenting regime and requirements surrounding the delivery of sites can still achieve delivery early in the plan period rather than the latter stages as currently identified. In order to provide an indication of the ability to deliver the scheme, the following indicative timeline has been provided to assist in identifying an indicative completion date for the site:

Adoption:	December 2024
Survey work & formation of scheme:	6 months = June 2025
Pre-Application Consultation:	3 months = September 2025
Update & Finalisation of application:	2 months = November 2025
Submission & determination of application:	6 months = May 2026
Discharge of conditions:	3 months = August 2026
Construction of Phase 1:	12 months = August 2027
Construction of Phase 2:	12 months = August 2028
<u>TOTAL TIMESCALE:</u>	<u>3 years and 8 months = August 2028</u>

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On the basis of the above it is therefore suggested that the site has the potential to be delivered earlier in the plan period than has been set out as part of the delivery programme, which in turn would providing a significant housing contribution within the initial stages of the plan, bridging the gap for the shortfall of housing provisions that is currently evident, given the lack of a 5-year land supply across the County.

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CONCLUSIONS

The site the subject of this supporting representation is one that complies with the strategic aims of the LDP and is therefore considered to be a realistic and deliverable proposal, which is founded on a robust and credible evidence base in order to meet the test of soundness of the revised plan.

The allocation represents a logical extension and rounding off in respect of the existing settlement limits of the LDP, where through its inclusion the site would only seek to enhance the area.

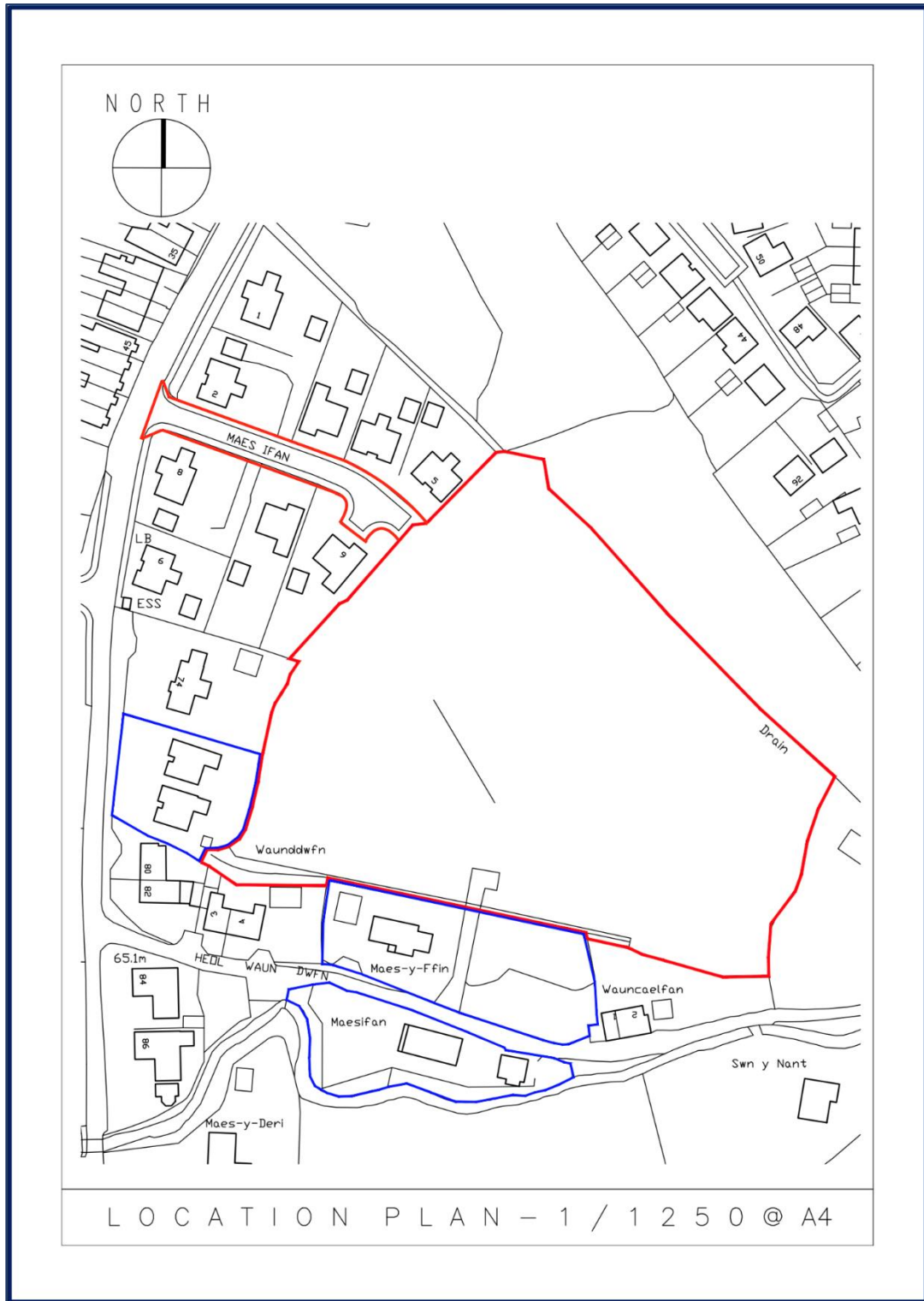
The principle of allocating the site at Maesquarre Road for housing is appropriate as the site complies with the search sequence and allocation process provided in Planning Policy Wales. In accordance with paragraphs 4.7.2 and 9.2.9 of PPW, the site is:

- Sustainably located within a growth area to maintain and improve the vitality, attractiveness and viability of the area.
- Within walking and cycling distance of key services, facilities and employment opportunities within Betws and Ammanford, thereby minimising the need to travel particularly by private car.
- Located such that it is already well served by existing and necessary infrastructure to support the proposed development.
- Located in a settlement and a location that will be resilient to climate change and any other impacts of climate change can be dealt with through design and other mitigation measures.
- Is not subject to any physical or environmental constraints on development including flood risk or ecology nor that of recent issues surrounding phosphates.

It is therefore on the basis of the above that my clients respectfully request, that the appointed Inspector, Members and Officers of the Council continue to support the inclusion of the site, in order to help ensure that the continued housing needs of the County can be realised through the 2nd Deposit Revised Carmarthenshire LDP 2018 - 2033.

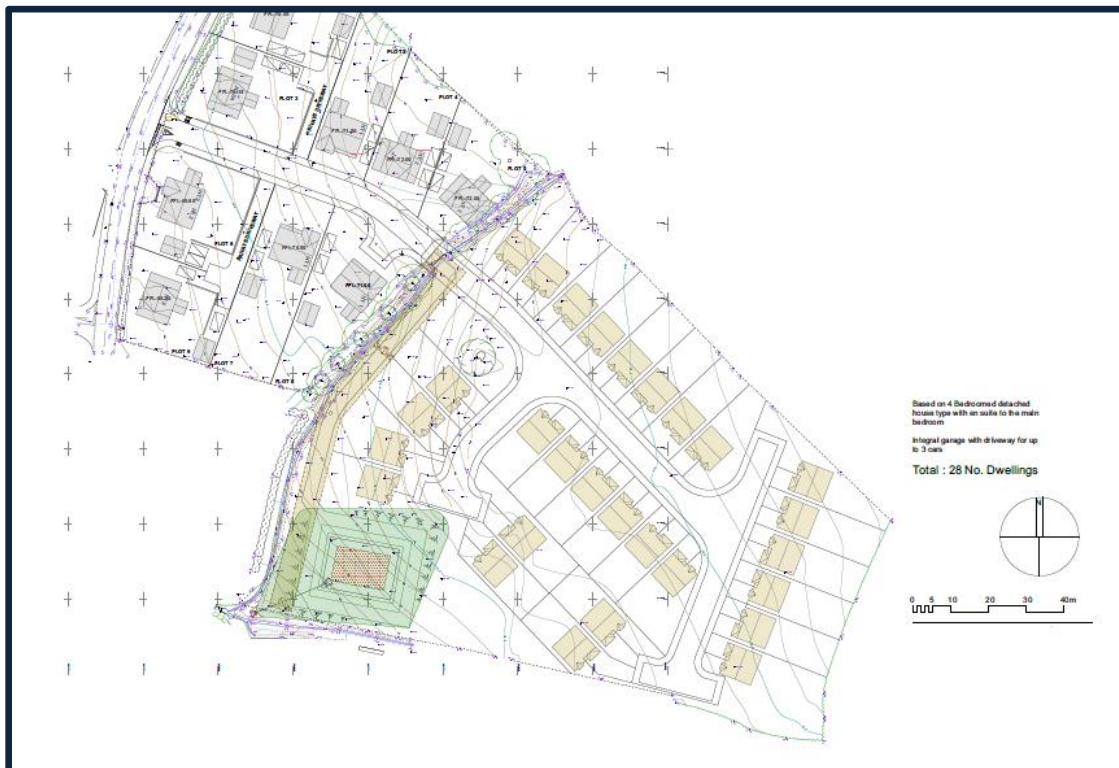
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APPENDIX 1 – SITE LOCATION PLAN



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APPENDIX 2 – INDICATIVE SITE LAYOUT OPTIONS



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APPENDIX 3 – INDICATIVE ELEVATIONS & HOUSE TYPES



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APPENDIX 4 – SUSTAINABILITY APPRAISAL SUMMARY

Cynllun Datblygu Lleol Diwygiedig Sir Gar 2018 - 2033 / Carmarthenshire Revised Local Development Plan 2018 - 2033 Arfarniad Cynladwyedd Integredig / Integrated Sustainability Appraisal			
Manylion y Safle / Site Details			
Rhif y Safle Ymgeisio / Candidate Site Number:	SR/004/015 CA0420	Cyfeirnod y Safle / Site Reference:	PrC3/h6
Cyfeiriad y Safle / Site Address:	Tir ger Maes Ifan Land adjoining Maes Ifan	Arwynebedd y Safle / Site Area:	1.563ha
Defnydd Presennol / Existing Use:	Amaethyddiaeth / Agriculture	Defnydd Arfaethedig / Proposed Use:	Preswyl Residential
		Os arall, nodwch / If other, specify:	0

Amcanion ACI / ISA Objectives	Sgôr ACI / ISA score	Meini Prawf Cynladwyedd / Sustainability Criteria
1. Datblygu Cynaliadwy / Sustainable Development	+	++ Mae'r safle arfaethedig yn cydymffurfio ag Amcanion lluosog / Proposed site complies with multiple Objectives.
2. Bioamrywiaeth / Biodiversity	-	+ Mae'r safle arfaethedig yn cydymffurfio â'r Amcan / Proposed site complies with Objective
3. Ansawdd Aer / Air Quality	+/-	+/- Mae'r safle arfaethedig yn cydymffurfio â rhai elfennau o'r Amcan tra'n rhwystro eraill. Ystyriwch lliniaru'r effeithiau negyddol. / Proposed site complies with some elements of the Objective whilst hindering others. Consider mitigating the negative effects.
4. Ffactorau hinsoddol / Climatic Factors	+	- Mae'r safle arfaethedig yn gwrthdaro ag Amcan. Gall y safle fod yn amhriodol i'w ddatblygu. Ystyried lliniaru sylweddol. / Proposed site is in conflict with an Objective. Site may be inappropriate for development. Consider significant mitigation.
5. Dŵr / Water	+/-	--- Mae'r safle arfaethedig yn gwrthdaro â nifer o Amcanion. Gall y safle fod yn amhriodol i'w ddatblygu. Ystyried lliniaru sylweddol. / Proposed site is in conflict with multiple Objectives. Site may be inappropriate for development. Consider significant mitigation.
6. Asedau Materol / Material Assets	+	0 Effaith niwtral o gymharu â'r sefyllfa bresennol / Neutral effect compared to the current situation.
7. Pridd / Soil	-	
8. Treftadaeth Ddiwylliannol ac Amgylchedd Hanesyddol / Cultural Heritage and Historic Environment		
9. Tirwedd / Landscape	+/-	
10. Poblogaeth / Population	++	
11. Y Gymraeg / The Welsh Language	+	
12. Iechyd a Liesiant / Health and Well-being	+	
13. Addysg a Sgiliau / Education and Skills	+	
14. Yr Economi / Economy	+	
15. Gwead Cymdeithas / Social Fabric	++	

Sylwebaeth Arfarniad Cynladwyedd Integredig / Integrated Sustainability Appraisal Commentary	
<p>Drwy beidio â defnyddio tir sydd wedi ei ddatblygu'n flaenorol, bydd y datblygiad ar y safle hwn yn lleihau asedau feidraidd (e.e., adnoddau tir a phridd) a gall fod yn debygol o achosi colled/dadleoli bioamrywiaeth – yn gyffredinol, ac o bosib effeithio ar reoli cynaliadwy adnoddau naturiol a rhwystro cadwraeth natur/hinsawdd. O ystyried yr effaith negyddol a roddir ar fioamrywiaeth o ganlyniad i newid datblygiad/defnydd tir, cyfeirir at Bolisi Strategol – SP 14: Cynnal a Gwellia'r Amgylchedd Naturiol.</p> <p>Mae'r safle arfaethedig yn gwrthdaro â sawl Amcan ACI. Disgwylir i bolisiau lliniarol a nodir o fewn y CDLID ddatrys y materion hyn, fodd bynnag, bydd angen sicrhau bod y rhain yn cael eu gweithredu'n gywir ac yn cael eu monitro'n briodol, yn amodol ar ofynion cynllunio.</p>	<p>By not utilising previously developed land, development on this site will reduce finite assets (e.g., land and soil resources) and may cause a loss/displacement of biodiversity – overall, potentially impacting the sustainable management of natural resources and hindering nature/climate conservation.. Given the negative impact placed upon biodiversity as a result of development/land use change, reference is made to Strategic Policy – SP 14: Maintaining and Enhancing the Natural Environment.</p> <p>The proposed site conflicts with several ISA Objectives. Mitigative policies set out within the rLDP are expected to resolve these issues, however, it will be necessary to ensure these are correctly implemented and appropriately monitored, subject to planning requirements.</p>

