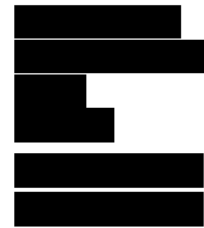


Carmarthenshire County Council
Forward Planning Section
Environment Department
5-8 Spilman Street
Carmarthen
Carmarthenshire
SA31 1JY



Your ref:

Our ref:

By email: [Redacted]

12th April 2023

Dear Sir/Madam

CARMARTHENSHIRE COUNTY COUNCIL: SECOND DEPOSIT REVISED LOCAL DEVELOPMENT PLAN

This representation is made in response to the 'Carmarthenshire County Council Second Deposit Revised Local Development Plan' ("the LDP") consultation and is submitted on behalf of Mr James George.

Mr George owns "Llwyndu" Land at Milo, Llandybie ('the site') which has been considered in the Candidate Sites Register Assessment for potential inclusion within the LDP. The site can be seen, outlined in red, on the plan found at **Appendix 1**.

It is respectfully suggested that the site should be allocated in the LDP, to provide confidence that houses can be delivered to meet local needs in Milo. Alternatively, the site is capable of meeting the criteria set out in the proposed policy framework of the LDP to allow its development for new homes, so long as some flexibility and judgment can be applied.

THE SCALE OF PROPOSED GROWTH

We support the ambition and principle of the LDP, and specifically the targets set out in Policy SP1:

Strategic Policy - SP1: Strategic Growth

The LDP will provide for the future growth of a sustainable economy and housing requirement through the provision of:

a. 9,704 new homes to meet the identified housing requirement of 8,822.

b. A minimum of 71.21ha of allocated employment land.

The focus on regeneration and growth reflects the Council's core strategic ambitions with development distributed in a sustainable manner consistent with the spatial strategy and settlement framework.

It is clear that the Council has taken seriously its responsibility to support the delivery of the homes and jobs which are needed in Carmarthenshire. The targets appear aspirational, but realistic. What should not be overlooked in these strategic targets however is the very real need to support the more rural parts of the community and meeting their needs.

Sites like “Llwyndu” Land at Milo, Llandybie provide a valuable opportunity to deliver new homes in a rural hinterland which supports an overall network of social and economic growth. This growth is set out in the LDP, and the site could be delivered through an allocation, or as a windfall – and either way, it would contribute to the overall housing target set by the Council.

MILO AS A LOCATION FOR GROWTH

Introduced in chapter 10 of the LDP is the concept of “Clusters” and Milo falls within the settlements grouped in “Cluster 3: Amman and Upper Gwendraeth.”

We note with interest the way in which Cluster 3 is described in the LDP. In particular, we note the following elements of the spatial portrait, and that the cluster:

*“...is characterised by a series of interrelated settlements; [and]
...has grown as a centre with a focus for investment in jobs, homes, and services.”*

And specifically, that:

“Ammanford ...plays an important service centre role by providing localised retail, employment, education, and leisure facilities.”

We also note that:

Cross Hands as a former mining community has developed over recent decades through its position on the A48 strategic transport route.

Regarding Cross Hands, it is exciting to see a range of significant economic growth is planned to include:

- PrC3/E1 – Employment allocation of some 8.31 Ha
- PrC3/E3 - 4.76 Ha extension to business park
- SG2/3 – reserved expansion area for large scale employment uses.

This growth will also be accompanied by:

TRA1: Transport and Highways Infrastructural Improvements

Transport routes, improvements and associated infrastructural facilities which deliver the objectives and priorities of the Joint Transport Plan for South West Wales (2015 – 2020) will be supported.

The improvements to the highway infrastructure as part of the Cross Hands Economic Link Road will be safeguarded with the route identified on the proposals map.

Proposals which maintain and enhance an integrated sustainable transport network will also be supported where they accord with the policies and provisions of this Plan. Development proposals which do not prejudice the efficient implementation of any identified improvement or scheme will be permitted.

Land at Milo, Llandybie is approximately 4 miles from Cross Hands via the A476 and the new Cross Hands relief road, avoiding additional traffic on the congestion pinch points of the Cross Hands roundabout and Gorslas.

These points suggest that each settlement in the cluster has a role to play in supporting the successful social and economic activity in the area, and that the services and facilities of the larger settlements, support a hinterland of slightly dispersed but nonetheless connected communities.

To maintain this success, and to ensure the continued vitality of the more rural communities it is vital that development is allowed to happen at all tiers (and sizes) of settlement in the cluster.

We note that potential development in Milo is proposed to be managed primarily through two policies: SP3: Sustainable Distribution, and HOM3: Homes in Rural Villages.

Therefore, taking each of these policies in turn:

STRATEGIC POLICY – SP3: SUSTAINABLE DISTRIBUTION – SETTLEMENT FRAMEWORK

We generally support the principle of this policy. Settlement hierarchies are a well-recognised way of managing growth and directing it to the most sustainable locations, and it is important that the role of smaller settlements such as Milo is not over looked, and that the needs of people who live in these more rural locations are also met.

We note that Milo is listed as a “Tier 4 – Rural Villages (No development limits).” On the face of it, given the size of Milo this is reasonable, and the fact that the village is a well-connected part of the ‘cluster’ is also recognised.

Furthermore, we read with interest in the supporting text to Policy SP3 that in “Rural Villages (No Development Limits)” the following scale of development will be acceptable:

- Small sites – housing through infill or logical extensions/rounding off.
- Small Scale Rural Exceptions Schemes for Affordable Housing

We respectfully suggest that Land at Milo, Llandybie represents a small infill site as presented in the supporting text to Policy SP3. The site should be allocated as such in the LDP to provide confidence that it will be delivered in the plan period to help meet both the strategic needs of Carmarthenshire and specifically the local housing needs in “Cluster 3: Amman and Upper Gwendraeth” and Milo.

HOM3: HOMES IN RURAL VILLAGES

Should the Council decide that Land at Milo, Llandybie does not need to be allocated for development, the site has the potential to be delivered as ‘windfall,’ broadly in conformity with proposed Policy HOM3.

There are, however, some element of this proposed policy which are somewhat arbitrary, and we suggest that some flexibility and planning judgement is allowed, to ensure the most appropriate development opportunities are delivered, and the most efficient use is made of land.

In particular we note that proposed Policy HOM3, suggests the following:

In those settlements identified as rural villages under Policy SP3, proposals for 1 to 4 dwellings will be permitted for the following:

- *minor infill of a small gap between the existing built form; or,*
- *logical extensions and/or rounding off of the development pattern that fits in with the character of the village form and landscape; or*

- *conversion or the sub-division of large dwellings.*

Such proposals will be subject to other detailed planning considerations set out within LDP policies.

As we have explained in response to proposed Policy SP3, and is elaborated upon in our site specific comments - Land at Milo, Llandybie is a sensible and logical infill site. However, because the most logical infill is for 6 new homes the potential to develop the site would – in principle – be contrary to proposed Policy HOM3, but the 1 to 4 dwellings requirement is entirely arbitrary and does not appear to be justified in the supporting text to the policy, or in any supporting evidence.

We suggest therefore that the reference to 1 to 4 dwellings is removed from the policy text, and this would have a limited effect on how the policy operates. There is still sufficient scope for a ‘case by case’ assessment of the acceptability of infill sites, and for some flexibility to be applied where perhaps 6 houses might be more appropriate and in character with a site’s surrounds, but equally importantly it makes an efficient use of land.

The final paragraph of proposed Policy HOM3 is also arbitrary and not justified in evidence that we have been able to identify. The following part of the polciy is not necessary, and should be removed:

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

By way of an example, there are currently 50 homes in Milo, and Land at Milo, Llandybie can deliver 6 infill homes, but this would be apparently contrary to proposed policy HOM3 (by a factor of a single house) for no reason other than it breaches an arbitrary 10% cap. This risks both the viability of schemes, and the efficient use of land.

“LLWYNDU” LAND AT MILO, LLANDYBIE

Turning to the site which we are proposing should be allocated for development. This submission commends to the Council, Land at Milo, Llandybie (‘the site’) which has been considered in the Candidate Sites Register Assessment for potential inclusion within the LDP.

The site address is as follows:

Llwyndu
Milo
Llandybie
Ammanford
SA18 3NQ

The site has been assessed by the Council and the site reference is SR/114/001. The assessment of the site states

“The site may comply with the provisions of the Preferred Strategy, however each individual site will require assessment at application stage to ensure it complies with the relevant specific policy. In respect of this settlement, the Preferred Strategy identifies it as a Tier 4 with no development limits”

We support the general assessment of the site and suggest that it should be allocated for development to provide confidence in its delivery.

However, should the Council disagree with this position, we remain confident that the site is acceptable, and achievable as infill development.

Site Context

The site comprises 4.64 acres of agricultural fields within the settlement of Milo, which is identified in Policy proposed policy SP3 as a sustainable community. A site location plan, which was submitted with our initial submissions to the candidate sites register is included again for completeness (Appendix 1).

The site benefits from an existing access with good visibility onto the main road running through Milo, as shown in Figure 1 below.

Figure 1 – Access to the site from the main road through Milo (Google Street View - 2011)



The site is bound by agricultural fields to the south west, residential properties to the south east and a chapel to the North West. The site is bounded by the road to the north east, whilst two and three storey residential properties lie on the opposite side of the road.

There are two listed buildings to the north of the site: Capel Milo (ID: 22200) and Hen Gapel Milo (ID: 22199).

The village of Milo contains around 50 homes. Milo is approximately 4.5 miles north of Ammanford, which is recognised as a growth area in proposed Policy SP3 and the heart of a cluster or network of connected communities. Milo is approximately 5 miles south west of Llandeilo which is also identified as a service centre. There is a bus service from Milo to Llandeilo.

Proposed Development

It is considered that the site could be developed along the road following the existing linear pattern of built form in Milo. In this case, it is considered that the site could comfortably accommodate approximately six dwellings and utilise the existing access, as shown in Figure 1 above. Such development would mirror the existing settlement and would constitute 'infill' development, as supported in proposed Policies SP3 and HOM3.

As highlighted within our initial submission, an alternative option is to develop the whole of the site, again utilising the existing access, which could accommodate approximately 15 dwellings, thus triggering the need for affordable housing which would provide additional benefits to the locality.

Two broad indicative layouts were provided within our initial submission and have been included again for completeness (see Appendix 2).

The site also lies within a sustainable location within Milo itself, located approximately 140m to the local bus stops from the existing access into the site shown in Figure 1 above.

CONCLUSION

We are pleased to have had the opportunity to comment on the 'Carmarthenshire County Council Second Deposit Revised Local Development Plan.' We support the general vision, and approach of the LDP but suggest that some flexibility and room for judgement must be retained to allow for the continued vitality of some of the more rural parts of the county.

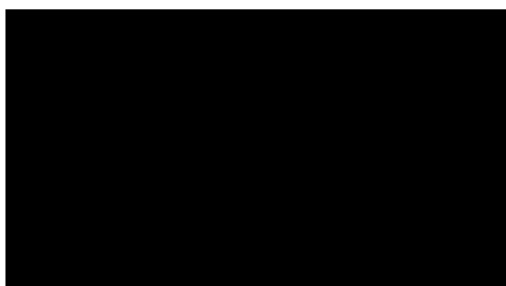
"Llwyndu" Land at Milo should be allocated for development to provide some confidence that local housing needs will be met. However, failing that the site is capable of providing a reasonable 'windfall' development as infill.

As has been demonstrated above, the site (SR/114/001) constitutes a suitable and sustainable form of development within the settlement of Milo.

Overall, it is considered that the site (SR/114/001) constitutes the only suitable and sustainable Candidate Site within Milo for residential development. The site is capable of mirroring the linear form of development that exists along the main road through Milo, and would therefore be a logical means of increasing housing within this sustainable community (as promoted through proposed Policy SP3 Local Development Plan).

I trust the information provided in this submission is sufficient. Should you require any further information, please do not hesitate to contact me.

Yours faithfully,



**Peter Canavan BA(Hons) MSc MRTPI
Partner**

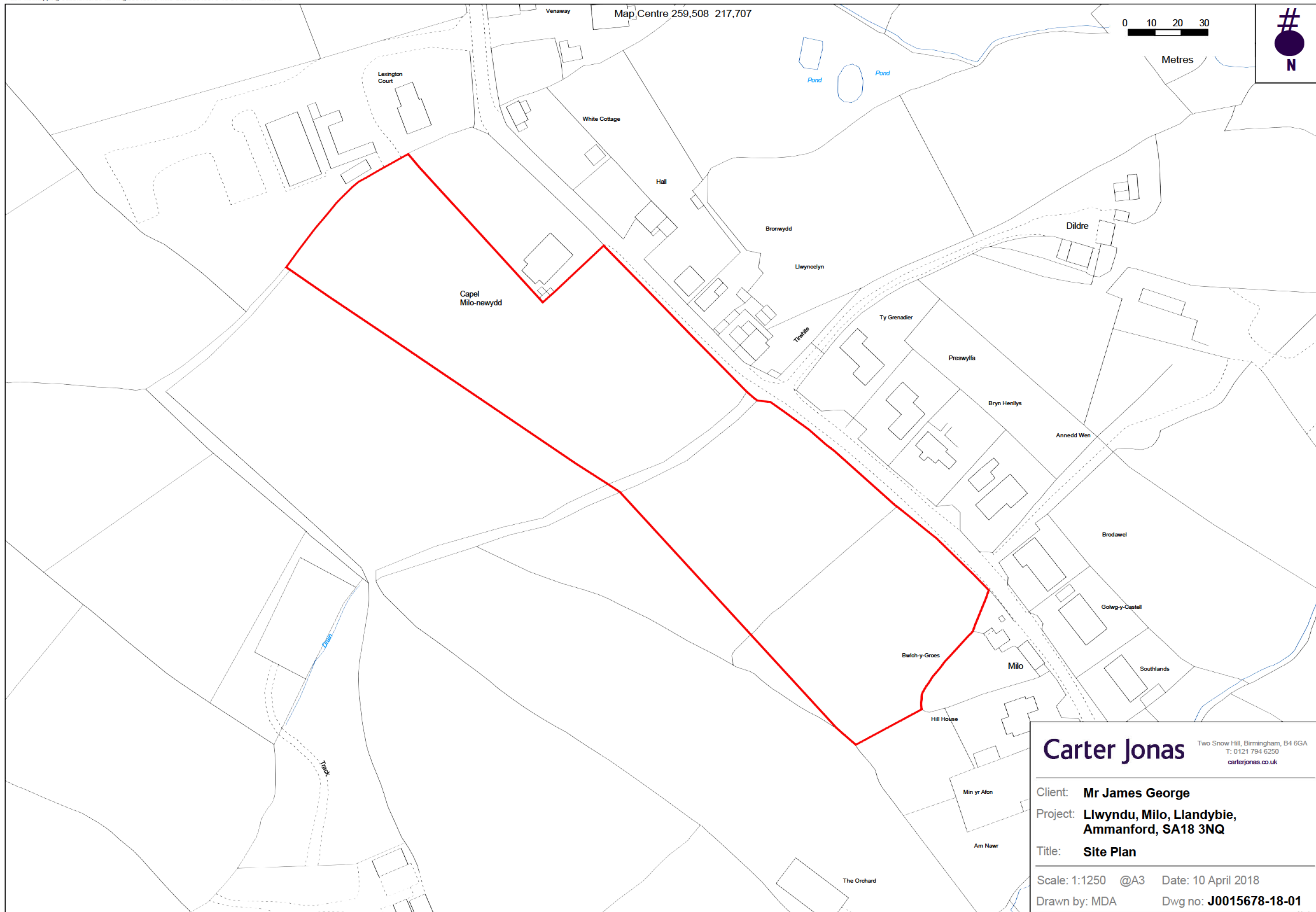
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Appendix 1 – Site Location Plan

Map Centre 259,508 217,707

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Metres



Carter Jonas

Two Snow Hill, Birmingham, B4 6GA
T: 0121 794 6250
carterjonas.co.uk

Client: **Mr James George**

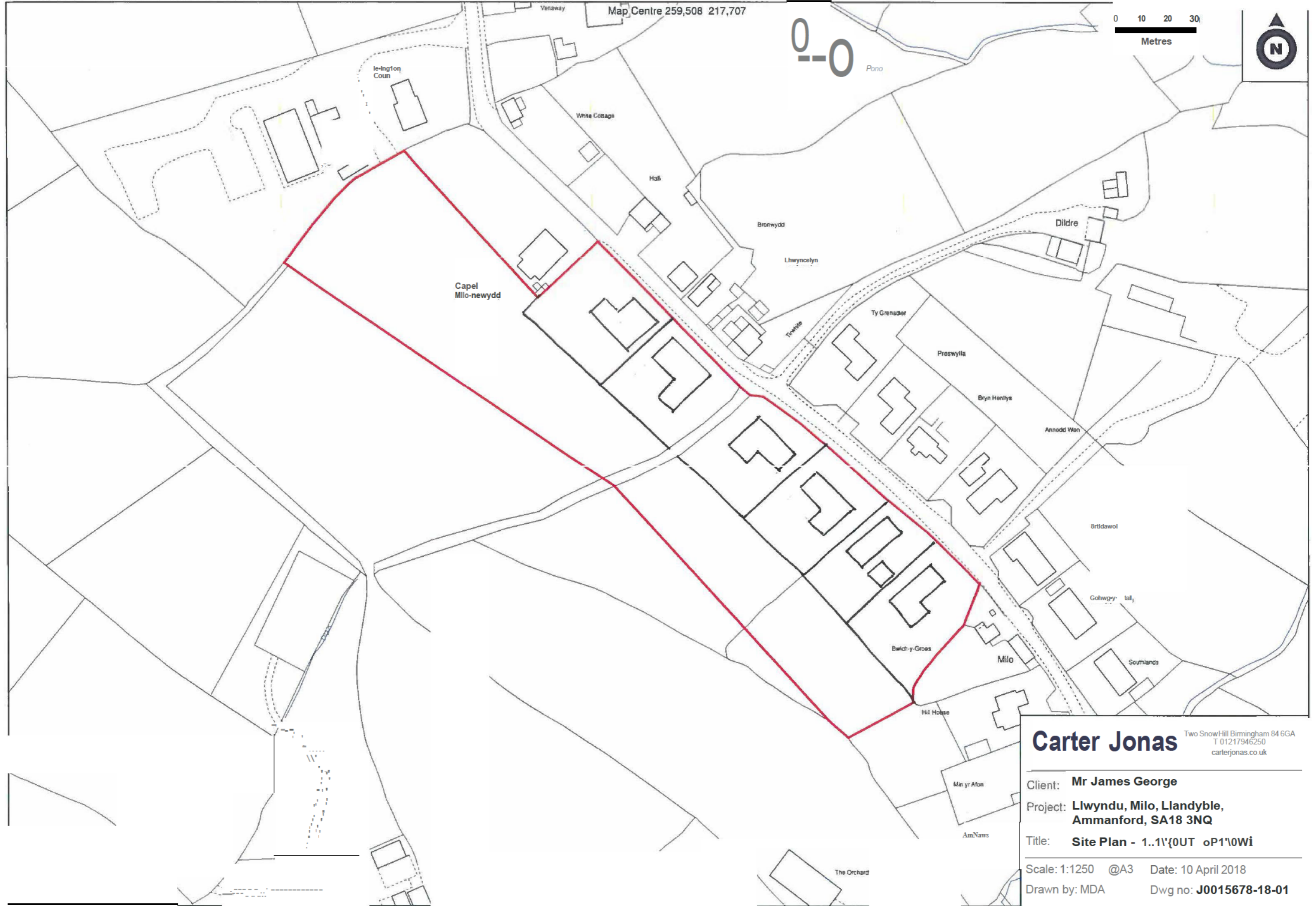
Project: **Llwyndu, Milo, Llandybie,
Ammanford, SA18 3NQ**

Title: **Site Plan**

Scale: 1:1250 @A3 Date: 10 April 2018

Drawn by: MDA Dwg no: **J0015678-18-01**

Appendix 2 – Indicative Layouts



Carter Jonas Two Snow Hill Birmingham B4 6GA
 T 01217946250
 carterjonas.co.uk

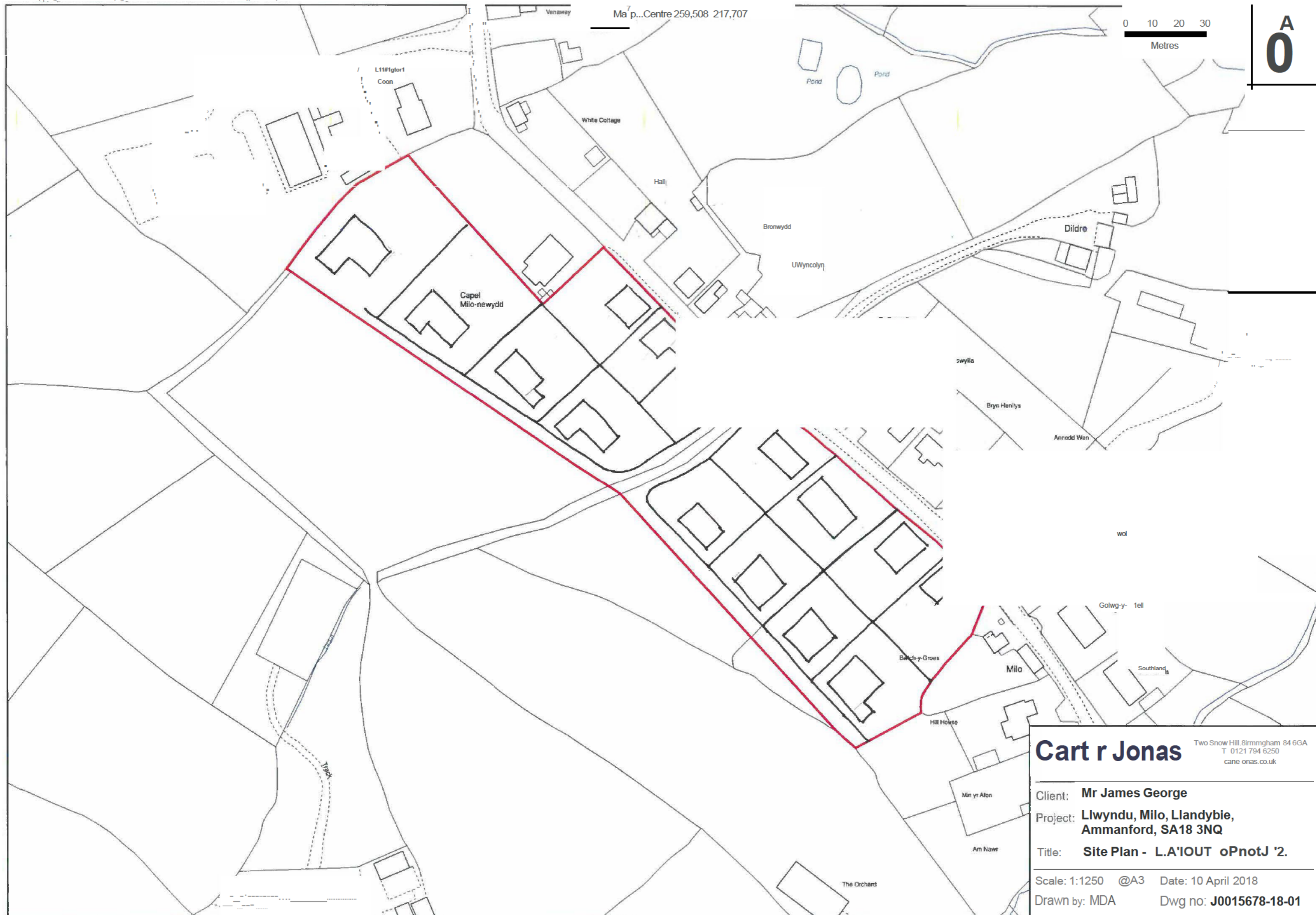
Client: **Mr James George**
 Project: **Llwyndu, Milo, Llandyble, Ammanford, SA18 3NQ**
 Title: **Site Plan - 1..1\{OUT oP1\0Wi**

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Client: **Mr James George**

Project: **Llwyndu, Milo, Llandybie, Ammanford, SA18 3NQ**

Title: **Site Plan - L.A'IOUT oPnotJ '2.**

Scale: 1:1250 @A3 Date: 10 April 2018

Drawn by: MDA Dwg no: **J0015678-18-01**