

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



T: [REDACTED]
F: [REDACTED]

Your ref:

Our ref:

By email: [REDACTED]

19th July 2023

Dear Mr Llewelyn

CARMARTHENSHERE COUNTY COUNCIL: SECOND DEPOSIT REVISED LOCAL DEVELOPMENT PLAN

REPRESENTATION NO. 5240 – OBJECTION TO THE NON-INCLUSION OF SITE SR/114/001 (HOM1) ON BEHALF OF JAMES GEORGE

Thank you for your letter of 5th July 2023 regarding our submissions made in response to the ‘Carmarthenshire County Council Second Deposit Revised Local Development Plan’ (“the rLDP”) on behalf of Mr James George.

Please find at **Appendix 1** to this letter a Sustainability Appraisal (SA) for:

“Llwyndu” Land at Milo, Llandybie (‘the site’) reference: **SR/114/001 (HOM3)**

In completing the SA we have followed the Authority’s guidance: Integrated Sustainability Appraisal Guide for Promoters of Sites for Development.

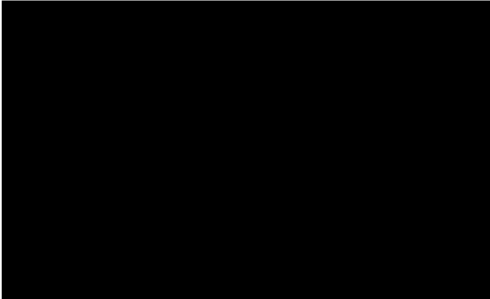
In the SA we have included excerpts from the various maps requested – and where maps are used the approximate location of the site is shown with a red star [★] – and we have used these maps and other data sources, which are all cited, to conclude that the site would represent a sustainable location for a modest scale of development.

Also, for context to the SA, at **Appendix 2** of this letter is a Site Location Plan and at **Appendix 3** are two Indicative Layouts. The SA should also be read alongside our previous submissions to the rLDP.

I trust that the appended material to this letter meets your requirements and those of the Welsh Government guidance, however, should you require any further information please do contact me at your earliest convenience.

Otherwise please do present this SA to the independent Planning Inspector for the Public Examination of the rLDP

Yours sincerely,



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

E: [Redacted]
M: [Redacted]
T: [Redacted]


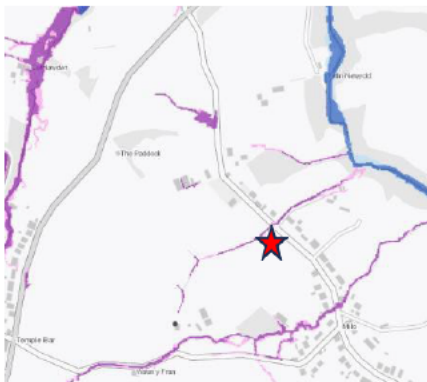
Appendix 1 – Sustainability Appraisal for “Llwyndu” Land at Milo, Llandybie: SR/114/001 (HOM3)


3.0 Site Assessment Proforma & Data Sources


Sustainability Appraisal for “Llwyndu” Land at Milo, Llandybie: SR/114/001 (HOM3)

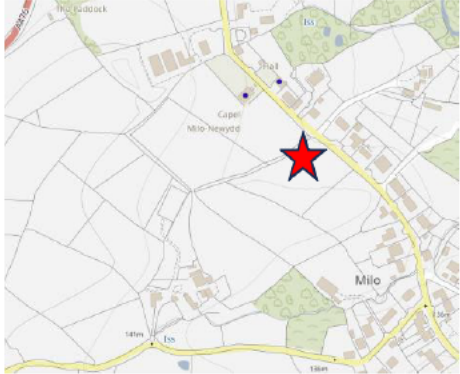
3.1 Please complete the below table with commentary for your site and, where relevant, attach supporting evidence. Alternative formats are acceptable.

Question	ISA Objective(s)	Data Source	Your Comments
<p>Q1. Is the site compatible against the location of future growth presented in the Deposit LDP?</p>	ISA1	<p>Please refer, in context, to the spatial strategy within the Deposit rLDP (paragraph 8.20, Chapter 9 and 10, Figure 8).</p>	<p>Yes.</p> <p>Milo is listed as a “Tier 4 – Rural Villages (No development limits).” The village is also a well-connected part of a ‘cluster’ which is recognised in the rLDP.</p> <p>In the supporting text to Policy SP3, in “Rural Villages (No Development Limits)” the following scale of development will be acceptable:</p> <ul style="list-style-type: none"> • Small sites – housing through infill or logical extensions/rounding off. • Small Scale Rural Exceptions Schemes for Affordable Housing <p>Land at Milo, Llandybie represents a small infill site as presented in the supporting text to Policy SP3.</p> <p>The site should be allocated as such in the rLDP 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.</p>
<p>Q2. Can the site accommodate 5 or more dwellings?</p>			<p>Yes. Please see potential site layouts attached, for 6 or up to 15 dwellings.</p>

<p>Q3. Is the site within, or directly related to an identified settlement in Tiers 1-3 of the LDP Preferred Strategy?</p>		<p>Full reference should be made to the rLDP Proposals Maps</p>	<p>No. Milo is listed as a “Tier 4 – Rural Villages (No development limits).”</p>
<p>Q4. Is the site located within a flood risk zone?</p>	<p>ISA4 ISA5</p>	<p>Please indicate whether the site is located (wholly or partly) within Zone A, Zone B, Zone C1, and/or Zone C2 of the Development Advice Maps. Additionally, state whether the site is located (wholly or partly) within any layer contained within the Flood Map for Planning. Please provide any additional flood risk assessment and/or related information if already undertaken by alternative site promoters.</p>	<p>The site is entirely in ‘Flood Zone A’ according to the Natural Resources Wales's Development Advice Map and National Flood Hazard and Risk Maps:</p>  <p>There is a very small amount of surface water flood risk on site, derived from a small water course (ditch) which runs across the it, as shown in the Flood Map for Planning (purple shading):</p> 

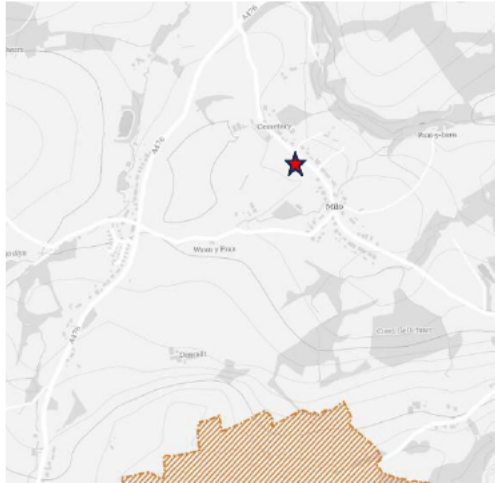
<p>Q5. Is the site located within or immediately adjacent to any sites designated for importance to nature conservation?</p>	<p>ISA2</p>	<p>Full reference should be made to the rLDP Constraints Maps.</p> <p>Sites to be identified are:</p> <ul style="list-style-type: none"> • Sites of Special Scientific Interest (SSSI) • Special Areas of Conservation (SAC) • Special Protection Areas (SPA) • National Nature Reserves (NNR) • Local Nature Reserves (LNR) • Common Land or registered village green <p>Reference may also be made to site-specific HRA reports and/or related ecological information, if already undertaken by alternative site promoters.</p>	<p>The site is not located in or immediately adjacent to any sites designated for importance to nature conservation.</p> <p>This is confirmed by the DEFRA ‘Magic Map’ which shows that the closest designations are the Carmel NNR, and Cerydd Carmel SAC both of which are over 1km to the south of the site at their closest point (Magic Map Application (defra.gov.uk)).</p> <p>The rLDP Constraints Map shows no constraints on site and the only matter of note is that the site is in the Caeau Mynydd Mawr SPG Area:</p>  <p>However, the Caeau Mynydd Mawr SAC is more than 5.5km to the southwest of the site.</p>
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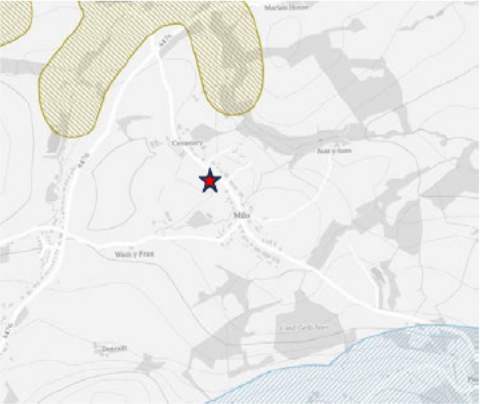
<p>Q6. Is the site located within or immediately adjacent to any Scheduled Monuments?</p>	<p>ISA8</p>	<p>Full reference should be made to the rLDP Constraints Maps.</p>	<p>The site is not located in or adjacent to a Scheduled Monument, as confirmed by the rLDP Constraints Map:</p> 
<p>Q7. Would development of the site be contrary to general planning principles?</p>	<p style="background-color: #cccccc;"></p>	<p>Full reference should be made to the Site Assessment Methodology (see paragraph 2.31 and 2.32).</p>	<p>The site is a small infill development opportunity which would mirror build form on the opposite side of the road, and the surrounding parts of Milo village.</p> <p>The site would not represent:</p> <ul style="list-style-type: none"> • Unacceptable ribbon development <i>(The site is infill between residential properties and a chapel.)</i> • Unacceptable tandem development <i>(The site is not currently ‘backland’ or set back behind existing properties)</i> • Unacceptable coalescence <i>(Development of the site would not lead to the coalescence of any settlements)</i> • Unacceptable sporadic development <i>(The site is infill and part of the Milo)</i> • Unacceptable extension to the settlement <i>(The site is infill and reflective of the build form on the opposite side of the road)</i> • Loss of areas of public open space and formal recreational land. <i>(The site is farmland, and has no public access at this time).</i>

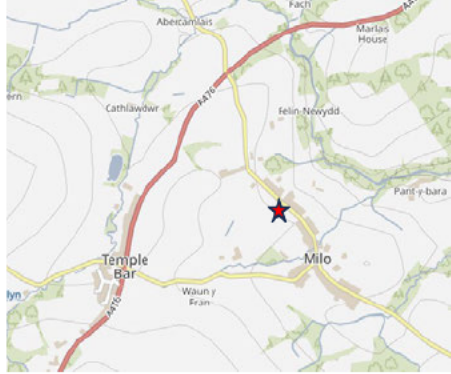
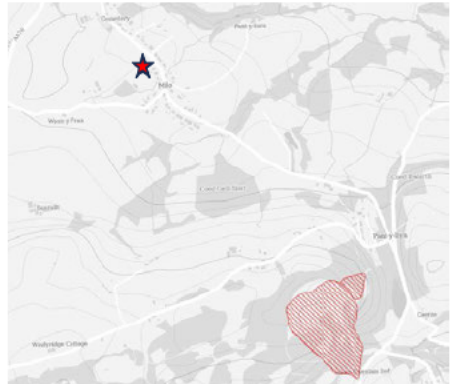
<p>Q8. Would the development of the site have a detrimental impact on the character and setting of the settlement or its features?</p>	<p>ISA8 ISA9</p>	<p>Full reference should be made to the Site Assessment Methodology (see paragraph 2.33).</p>	<p>No. The site is a relatively modest infill site which can provide 6, or up to 15 new dwellings which will be designed to be in character with the existing village.</p> <p>There are two listed building in close proximity to the site:</p> <ul style="list-style-type: none"> • Grade II: Hen Gapel Milo • Listed Buildings - Full Report - HeritageBill Cadw Assets - Reports (cadwpublic-api.azurewebsites.net) • Grade II: Capel Milo • Listed Buildings - Full Report - HeritageBill Cadw Assets - Reports (cadwpublic-api.azurewebsites.net)  <p>Any development proposals would be designed to conserve and enhance the significance and setting of the two chapels.</p> <p>The site is more than 5km from any LNR, and over 1km from the closest RIGS (the “Welsh Quarry” at Pentregwenlais / Carmel).</p> <p>Whilst the site is agricultural land it plays no specific or important role in overall green infrastructure (GI). Any GI would be retained through careful design of development.</p>
<p>Q9. Will the proposal involve the re-use of suitable previously developed land and/or buildings?</p>	<p>ISA9 ISA7</p>	<p>Full reference should be made to the Site Assessment Methodology (see paragraph 2.34).</p>	<p>No, the site is greenfield.</p>

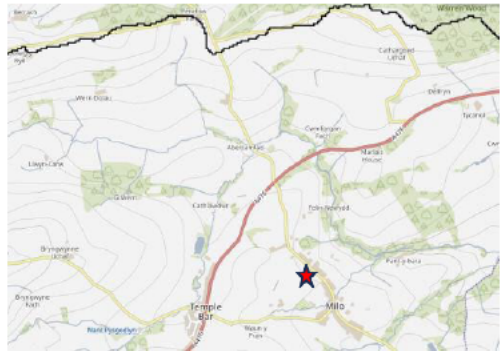
Q10. Is the site accessible from the existing public highway?			Yes. The majority of the site fronts the principal road through Milo.
Q11. Does the site have an available access point with adequate visibility?			<p>Yes. There is a farm gate access to the site at:</p> <ul style="list-style-type: none"> • Grid reference: SN 59594 17692 • What3words: ownership.convert.sleepless <p>The existing access gate has in excess of 70m clear visibility in both directions.</p>
Q12. Have any significant and evidenced highway issues been identified relating to the site?			No. The site is on the principal road through Milo which has approx. 5.5m carriageway, and the proposed development would be of a modest scale which would not significantly impinge on vehicle movements.
Q13. Does the site have suitable access to public transport and/or active travel route?	ISA3, ISA4, ISA6, ISA12, ISA13, ISA15	<p>Full reference should be made to the Site Assessment Methodology (see paragraph 2.39).</p> <p>Reference may be made to Data Map Wales Active Travel Approved Routes.</p>	Yes, the site is located approximately 140m to the local bus stops which have services to/from Llandeilo.
Q14. Does the site have access to green space, leisure, and recreational facilities that are within a reasonable distance?	ISA12, ISA15	<p>Reference should be made to the rLDP Proposals Maps.</p> <p>Note that the above is non-exhaustive. Please provide details of other green space, leisure, and recreational facilities within the vicinity of the site.</p> <p>Reference is made to the Site Assessment Methodology (see paragraph 2.40).</p>	<p>The closest outdoor recreational facility is Carmel Nature Reserve at Pentregwenlais which is 1.1 miles south of the site.</p> <p>Gelli Aur Country Park is also 1.2 miles to the north.</p>

<p>Q15 Is the site within reasonable distance to: (a) Employment provision (b) Retail provision (c) Other services and facilities</p>	<p>ISA6, ISA10, ISA14, ISA15</p>	<p>Full reference should be made to the Site Assessment Methodology (see paragraph 2.41).</p>	<p>The closest shops including a Co-op supermarket are at Llandybie, approx. 2.5 miles away.</p> <p>The site is approximately:</p> <ul style="list-style-type: none"> • 4 miles from Cross Hands • 4.5 miles north of Ammanford <p>Please which are recognised as growth areas in proposed Policy SP3 (further detail below).</p> <p>The site is also approximately 5 miles south west of Llandeilo which is also identified as a service centre.</p> <p>In chapter 10 of the rLDP is the concept of “Clusters” and Milo falls within the settlements grouped in “Cluster 3: Amman and Upper Gwendraeth.”</p> <p>Cluster 3 is described in the rLDP, as follows: <i>“...[it] is characterised by a series of interrelated settlements; [and] ...has grown as a centre with a focus for investment in jobs, homes, and services.”</i></p> <p>And specifically, that: <i>“Ammanford ...plays an important service centre role by providing localised retail, employment, education, and leisure facilities.”</i></p> <p>We also note that: <i>Cross Hands as a former mining community has developed over recent decades through its position on the A48 strategic transport route.</i></p> <p>Regarding Cross Hands, a range of significant economic growth is planned to include:</p> <ul style="list-style-type: none"> • 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.
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<p>Q16 Is the site within a reasonable distance to education facilities?</p>	<p>ISA13</p>	<p>Reference should be made to the Site Assessment Methodology (see paragraph 2.42).</p>	<p>The closest primary school are:</p> <ul style="list-style-type: none"> • Llandybie Primary School (2.5 miles) • Gorslas Primary School (4 miles) <p>The closest secondary schools are:</p> <ul style="list-style-type: none"> • Ysgol Bro Dinefwr, Ffairfach. (3.5 miles) • Ysgol Gyfun Maes y Gwendraeth (4.5 miles) • Ysgol Dyffryn Aman (4.8 miles)
<p>Q17. Is the site located within or adjacent to a mineral buffer zone?</p>	<p>ISA6</p>	<p>Full reference should be made to the rLDP Proposals Maps.</p>	<p>No, the site is not in, or adjacent to, any mineral buffer zone.</p> <p>The closest mineral buffer zone (shown on the rLDP Proposals Map) is:</p> <ul style="list-style-type: none"> • Pwllymarch / M16 (C900m south) – <i>orange hatching</i> 

<p>Q18. Is the site located within a Mineral Safeguarding Area?</p>	<p>ISA6</p>	<p>Full reference should be made to the rLDP Constraints Maps.</p>	<p>No, the site is not in, or adjacent to, any mineral safeguarding area.</p> <p>The closest mineral safeguarding areas (shown on the rLDP Proposals Map) are:</p> <ul style="list-style-type: none"> • Sand & Gravel (500m north) – <i>beige hatching</i> • Sandstone Aggregate (800m south) – <i>blue hatching</i> 
<p>Q19. Is the site within or immediately adjacent to an AQMA?</p>	<p>ISA3</p>	<p>Full reference should be made to the rLDP Constraints Maps.</p>	<p>No. The site is not in, or adjacent to, any AQMA.</p> <p>According to the rLDP Constraints Maps the closest AQMA appears to be over 25km away in Llanelli.</p>

<p>Q20. Does the site contain high carbon soil e.g., peatlands?</p>	<p>ISA7</p>	<p>A map of peat resources can be found here: https://datamap.gov.wales/maps/peatlands-of-wales-maps/</p>	<p>No. The site contains no “high carbon soils” as shown on the ‘Peatlands of Wales’ map:</p> 
<p>Q21. Does the site contain high quality agricultural land?</p>	<p>ISA7</p>	<p>A map of agricultural soil resources can be found here: https://datamap.gov.wales/layers/inspire-wg:wg_predictive_alc2</p>	<p>The whole site – according to the Predictive Agricultural Land Classification (ALC) Map – is Grade 3b agricultural land.</p> <p>Therefore, the site is not the best and most versatile agricultural land.</p>
<p>Q22. Is the site located within or immediately adjacent to any Regionally Important Geological and Geomorphological Sites?</p>	<p>ISA9</p>	<p>Full reference should be made to the rLDP Constraints Maps.</p>	<p>No. The site is not in or adjacent to any RIGS.</p> <p>According to the rLDP constraints map the site is more than 1km from the closest RIGS (the “Welsh Quarry” at Pentregwenlais / Carmel):</p> 

<p>Q24. Does the site have an available water connection?</p>		<p>Reference is made to the Site Assessment Methodology (paragraph 2.51)</p>	<p>As far as we are aware there is an available water connection for the site; the water main is under the road adjoining the land. Given that the site is adjacent to existing residential properties it is likely that the connection would be feasibly achieved.</p>
<p>Q25. Is the site within or adjacent to a phosphate sensitive SAC catchment?</p>	<p>ISA2 ISA5 ISA7</p>	<p>Full reference should be made to Data Map Wales.</p> <p>Reference may also be made to site-specific HRA reports and/or related information, if already undertaken by alternative site promoters.</p>	<p>No. The site is not in, or adjacent to, a phosphate sensitive SAC catchment.</p> <p>According to the Data Map for Wales the closest phosphate sensitive SAC catchment – for the River Tywi – is around 1.3 km north of the site (<i>the black line boundary</i>):</p> 
<p>Q26. Does the site have connections to other infrastructure requirements?</p>			<p>As far as we are aware there are available utilities for the site. Electric is in the road adjoining the land (that part of the village also has street lighting). There is also mains sewerage in the road, with a small treatment works just outside the village (what three words: practical.waddled.limitless). There is no gas.</p> <p>Given that the site is adjacent to existing residential properties it is likely that the connections would be feasibly achieved.</p>

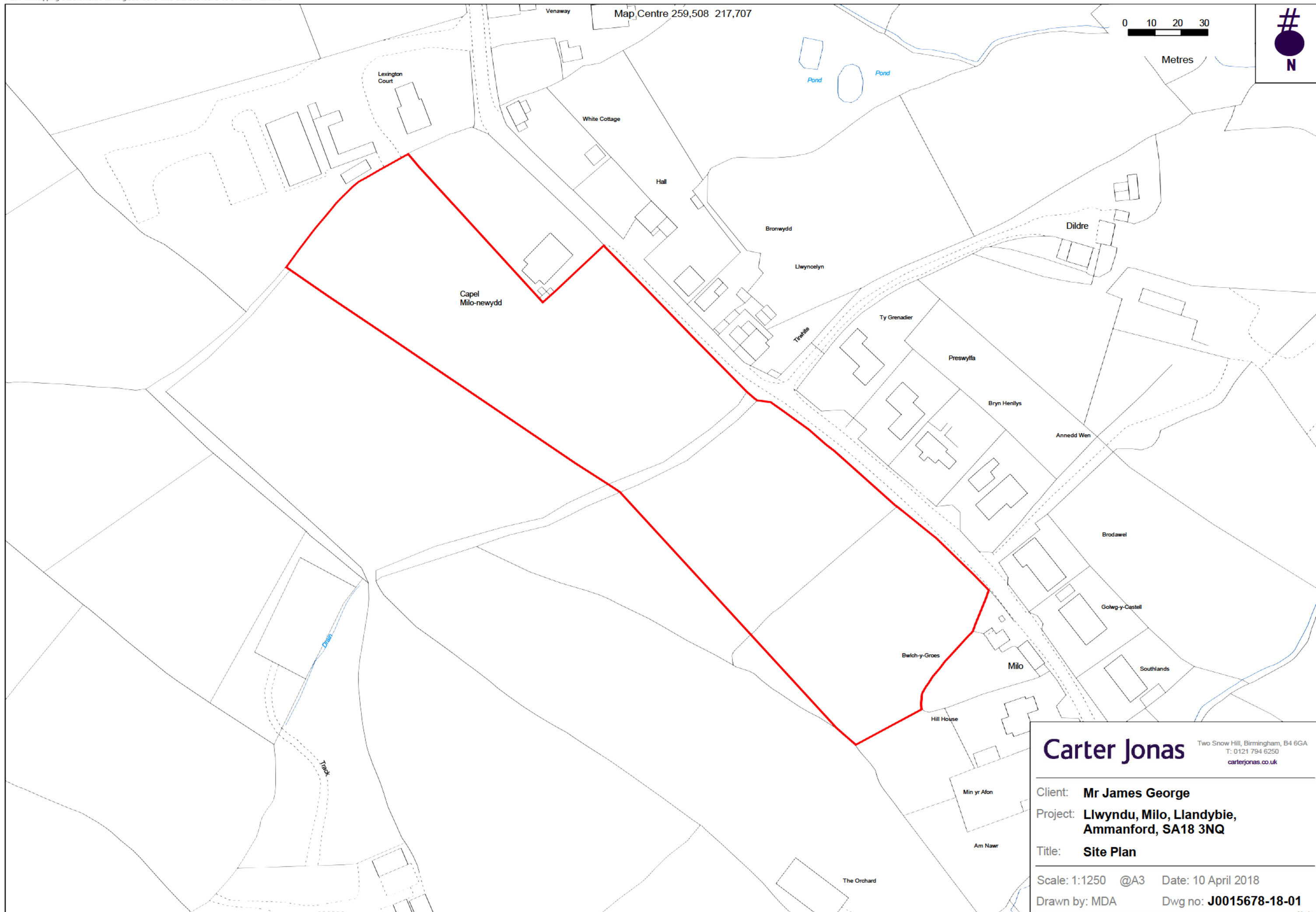
Q27. Does the location and/or scale of the site have the potential to have a detrimental impact on Welsh Language?	ISA11	Full reference should be made to the Site Assessment Methodology (see paragraph 2.56 and 2.57).	No. It is considered that the small scale, and integrated nature of the site will help to support community cohesion and provide potential opportunities to enhance Welsh language usage. The scale of the site also suggests that it would be delivered by a smaller local operator for whom the employment of Welsh language speakers is more likely.
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Appendix 2 – 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**

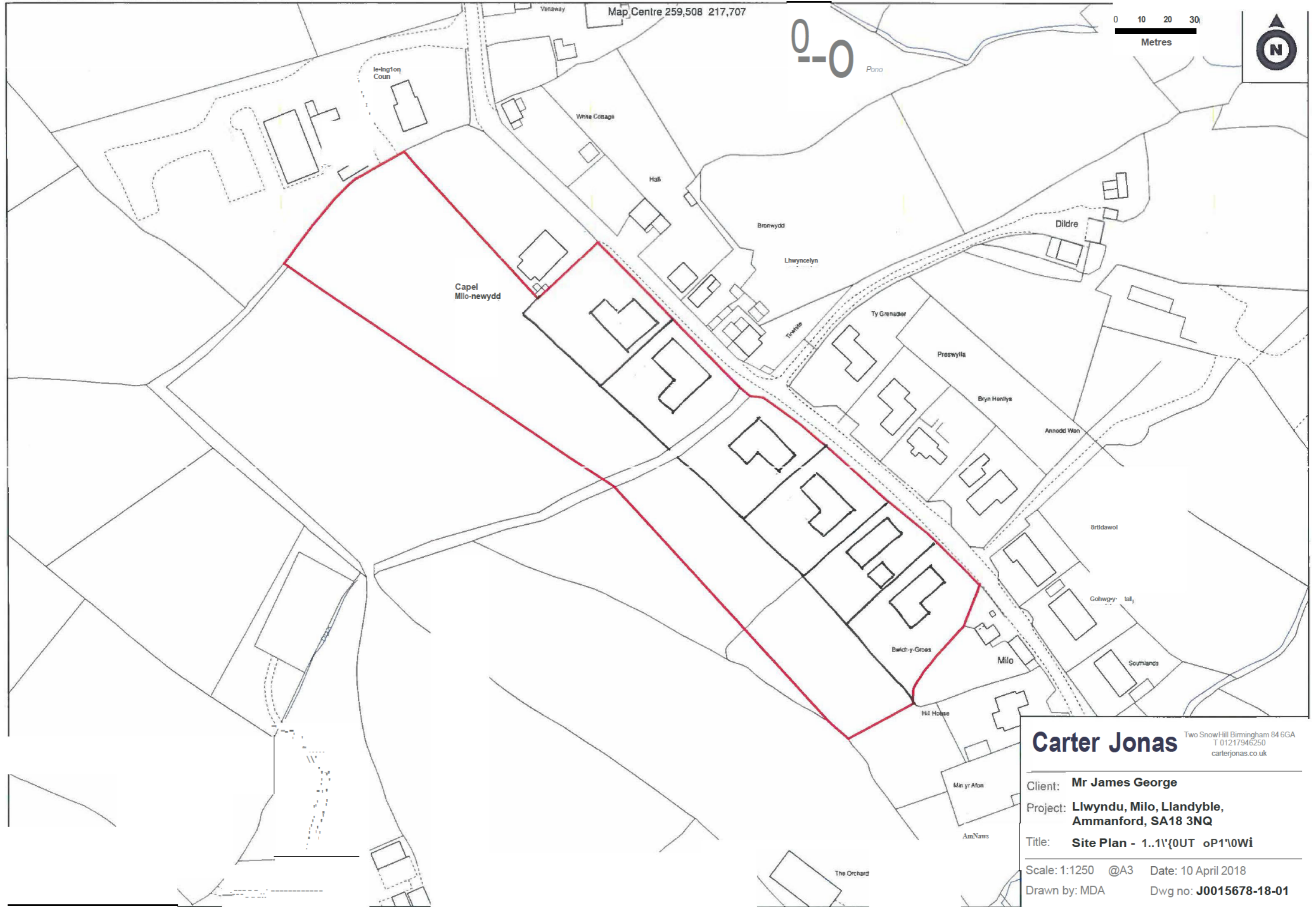
Project: **Llwyndu, Milo, Llandybie, Ammanford, SA18 3NQ**

Title: **Site Plan**

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

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

Appendix 3 – 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 - 1:1'0UT oP1'0Wi**

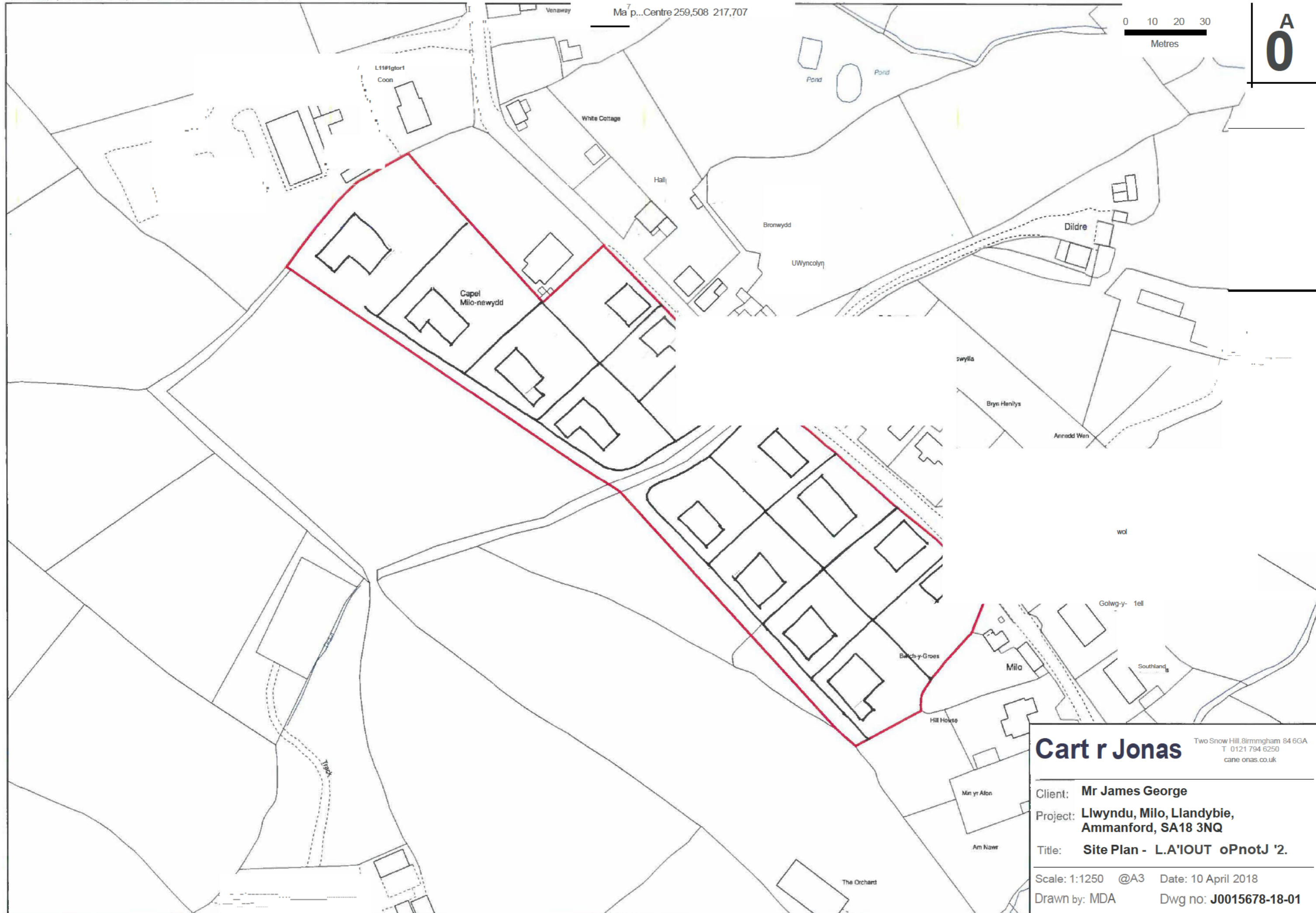
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Drawn by: MDA Dwg no: **J0015678-18-01**

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Cart r Jonas Two Snow Hill, Birmingham B4 6GA
T 0121 794 6250
cane onas.co.uk

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**