

FUGITIVE EMISSIONS PLAN

Prepared for: **Duncan McKenna**

By: **Stephen Owen, Environmental
Consultant**

Date: **March 2021**



DOCUMENT CONTROL SHEET

PROJECT:	Duncan McKenna - Cwmgwili
TITLE:	Fugitive Emissions Plan

PROJECT REF:	275-01-06-20
REPORT No.:	275-01-06.R02 Rev 3

PREPARED BY:

S Owen:


APPROVED BY:

A Davies:



Version	Date	Amendments
Original	August 2020	
Revision 1	January 2021	Included drainage and quarantine area detail. Wholesale changes made throughout report
Revision 2	February 2021	Updated tonnage per annum figures from <35,500 tonnes per annum to <32,500 tonnes per annum throughout report. Updated Site Plan in Figure 1
Revision 3	March 2021	Updated Section 4.0 to state procedures for accidental spillage on clean area of the site

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DUNCAN MCKENNA – CWMGWILI
FUGITIVE EMISSIONS PLAN

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1.0 INTRODUCTION, SITE SETTING AND DESCRIPTION OF ACTIVITIES

This Fugitive Emissions Plan has been prepared as part of on-site Operational Documentation in support of a proposed waste transfer station at Land Adjacent to Ty-Newydd, Cwmgwili, Llanelli, Carmarthenshire.

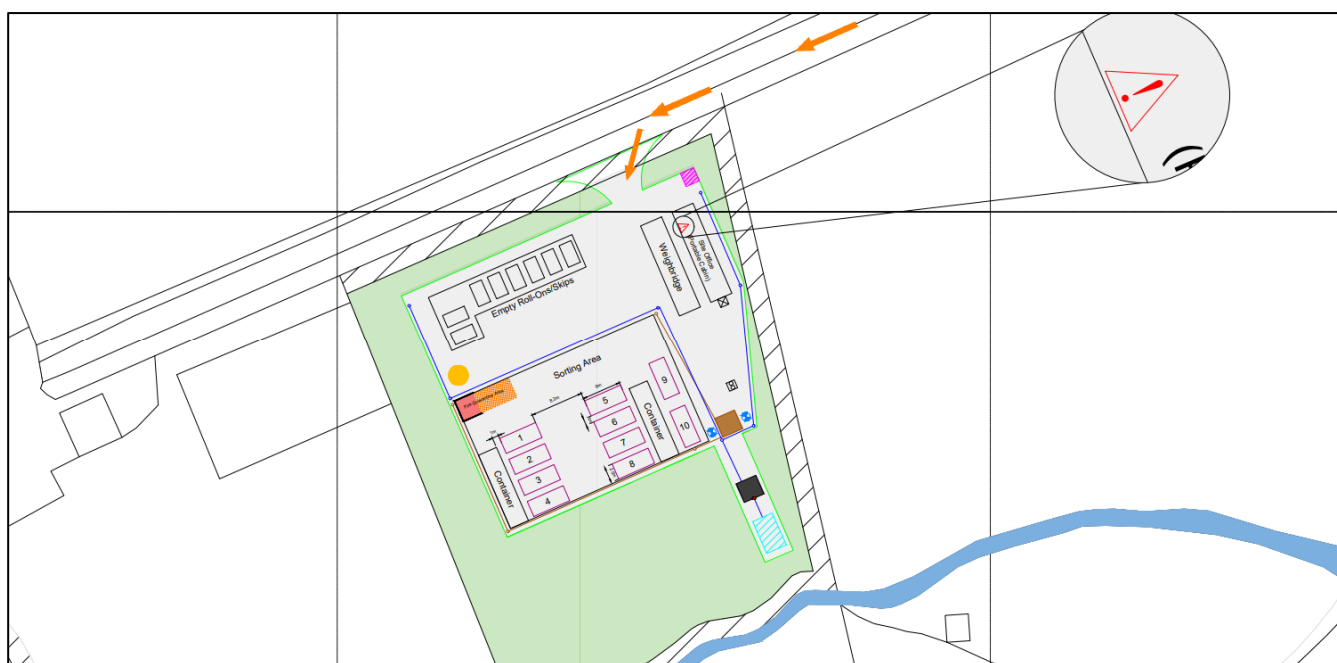
Site Location

The full site address is listed below: -

Land Adjacent to Ty-Newydd
Thornhill Road
Cwmgwili
Llanelli
Carmarthenshire
SA14 6PT

The general site layout and context with surroundings is visible in Figure 1 below: -

Figure 1 – General Site Layout



Site Description

The site is situated just off Thornhill Road, approximately 0.65km north of the village of Cwmgwili, 1.89km south west of the town of Cross Hands and 4.40km north of the M4.

The site's proposed operational use is as a household, commercial and industrial waste transfer station, with no building processing both non-hazardous non-biological and non-hazardous biological waste totalling circa <32,500 tonnes per annum.

The proposed operations to be undertaken at the site are: -

- <32,500 tonnes per annum of residential, commercial and industrial waste will be separated and then bulked for onward transfer to recycling, recovery or landfill outlets; and
- Up to 20 skips to be accepted on any one working day. No more than 40 tonnes of waste is expected to be accepted on site per working day.

An approximate expected breakdown of accepted materials is ~60% wood and similar, ~30% general skips, ~5% metal and ~5% construction materials.

A Site Plan is included in Appendix A showing the general layout which will be amended once the site is constructed to show aspects which may affect fire risk e.g. water sources, receptors, drainage, access to site and the location of wastes and hazardous materials on-site.

Waste is brought to site in covered vehicles where it is then unloaded for segregation into its individual components. Soils, hardcore and wood are stored in their own dedicated skip, whilst cardboard, paper and metal are stored in separate dedicated covered skips. This is the same for all other waste materials, which each have dedicated covered skips for storage.

The following principles are proposed for the waste transfer station: -

- There will be no stockpiling of material on the site at any time;
- All materials will be stored within suitably sheeted/covered skips or containers kept on the site impermeable hardstanding;
- A maximum of 300 cubic meters of material is proposed to be kept at the site at any one time, which would equate to ten, full, 40 cubic yard roll on-roll off containers;
- Each skip/container kept at the site will be clearly labelled to ensure the correct material is placed within it;
- The business benefits from the timely import and export of sorted material from the site to generate site turnover, which is the approach the operator will be taking. Wastes are therefore not intended to be stored on the site for the long term;
- Skips of mixed waste brought to the site will be tipped onto the hardstanding pad and immediately sorted into constituent components, with these placed in their respective skips/containers at the site;
- No fuel will be kept or brought onto site. No refuelling will be undertaken on site;
- No maintenance work will be undertaken on site;
- No crushing, screening, shredding, processing or treatment of material will be undertaken;
- All waste delivered to the site will be by appointment only, to prevent unauthorised material from being brought to site;
- Prior to delivery, the type of waste (determined by EWC) and volume of material/skip will be identified and confirmed to the site manager;
- The Site Manager will then co-ordinate and agree delivery times;
- Following delivery of the material to site, a visual inspection will be undertaken to identify any unauthorised materials. The waste transfer note for the material will also be reviewed, with the codes checked against those confirmed prior to delivery and visually against the material present in the skip;
- Only if your permit allows the waste identified and it meets the description given in the waste transfer note will the site manager allow the skip to be left at the site;
- Visual checks will be carried out at the weighbridge on site;
- Where unauthorised material is detected prior to the skip being tipped, it shall be rejected from site;
- Where unauthorised material is detected after the skip is tipped, the material shall be quarantined in a dedicated skip/container kept at the site for this purpose. The quarantined material shall then be disposed of off-site to a suitably licensed facility and an investigation undertaken into the presence of the unauthorised material.

The lifespan of the development will be directly related to the amount of material available for processing and the demand for the recycled materials produced. Given the local and national drive towards reducing waste and recycling, a minimum predicted lifespan of 25 years would not be unreasonable.

The site will operate between the hours of 08:00 and 18:00 Monday to Friday and between 09.00 and 17.00 on Saturdays. This site will be closed on Sundays, Public and Bank Holidays.

The site will only accept inert wastes which are identified within the Environmental Permit for the site. A list of proposed wastes to be accepted are detailed in section 4.1 or this report.

There will be no residues or hazardous materials that will require disposal from the normal operation of the facility.

Material will be brought to site via Cross Hands, down Thornhill Road which leads to the site access road. Material will be brought to and taken from the site in suitably enclosed or covered skips.

A quarantine skip and dedicated quarantine zone will be kept on site in the event that unauthorized material is discovered. This material would then be disposed of at a suitably licensed facility.

Every attempt will be made to identify unauthorized material at the delivery stage by visual inspection prior to or immediately after tipping in addition to consignment notes which should outline the origin and content of material being brought to site.

The material, once segregated, will be taken from the site to other local recycling centres/businesses for onward recycling.

The transfer and sorting activities could give rise to fugitive emissions which require management to prevent production and release to the environment and local sensitive receptors. This management plan outlines the steps taken to mitigate the release of the fugitive emissions identified within this assessment.

A full list of waste types to be accepted at the installation is shown below and overleaf: -

- **17 01 01** Concrete;
- **17 01 02** Bricks;
- **17 01 03** tiles and ceramics;
- **17 01 07** mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06;
- **17 02 01** Wood;
- **17 02 02** Glass;
- **17 02 03** Plastic;
- **17 04 01** copper, bronze, brass;
- **17 04 02** Aluminium;
- **17 04 03** Lead;
- **17 04 04** Zinc;
- **17 04 05** iron and steel;
- **17 04 06** Tin;
- **17 04 07** mixed metals;
- **17 04 11** cables other than those mentioned in 17 04 10;
- **17 05 04** soil and stones other than those mentioned in 17 05 03;
- **17 05 08** track ballast other than those mentioned in 17 05 07;
- **17 08 02** gypsum-based construction materials other than those mentioned in 17 08 01;
- **17 09 04** mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03;
- **20 01 01** paper and cardboard;
- **20 01 02** Glass;
- **20 01 10** Clothes;
- **20 01 11** Textiles;
- **20 01 38** wood other than that mentioned in 20 01 37;
- **20 01 39** Plastics;
- **20 01 40** Metals;
- **20 02 02** soil and stones;
- **20 02 03** other non-biodegradable wastes.

Fugitive Releases

This Management Plan addresses the need to manage the potential for fugitive emissions from the operations that may be considered as an environmental impact and a nuisance to neighbouring businesses and operations. Fugitive emissions include dust, volatile organic compounds (VOCs), mud, litter and fugitive releases to water and ground.

Fine dusts, fumes and volatile organic compounds can potentially lead to serious health impacts and fugitive leaks to ground or water can have serious effects on water supplies and aquatic ecosystems. These must be prevented or minimised no matter how near or far people or other receptors may be.

Other pollutants, such as coarse dust, mud and litter may be only a localised nuisance. However, you do not have the right to cause pollution or nuisance outside your site due to your activities. Your neighbours have a right to expect that your activities will not detract from their quality of life.

They have a right to expect that their environment will be free from emissions caused by your activities either on a continuous basis or at frequent intervals.

Examples of common sources of fugitive emissions are: -

- Sampling activities;
- Storage areas;
- Loading and unloading of skips;
- Transferring material from one vessel to another;
- Spillages;
- Accidental loss of containment from failed plant and equipment.

2.0 MANAGEMENT PLAN

The Fugitive Releases Management Plan will identify sources and potential sources of fugitive emissions and will consider the risk to sensitive receptors. The Fugitive Emissions Management Plan has been produced with the intention to reduce activities which may cause potential fugitive emission as much as possible.

This Fugitive Releases Management Plan contains: -

- An assessment of the risks of fugitive emissions problems, from normal and abnormal situations, including worst case scenarios, - for example from weather, temperature or breakdowns and accidents;
- The appropriate controls (both physical and management) needed to manage those risks;
- Suitable monitoring where required;
- Actions, contingencies and responsibilities when problems arise;
- Regular review of the effectiveness of fugitive emissions control measures.

3.0 SENSITIVE RECEPTORS

Personnel on Site

Personnel/operatives working on site are the closest receptors to any fugitive emissions produced on site, however due to consistent working conditions it may be unlikely that operatives would be particularly sensitive to fugitive emissions or to changes/fluctuations in fugitive emissions.

All operatives shall be made aware of the issue of fugitive emissions on site and should be fully conversant with the contents of the Environmental Management System and this Fugitive Releases Management Plan.

Neighbours

Neighbouring buildings and businesses are likely to be the most sensitive receptors to fugitive emission nuisances especially those not operating waste management facilities.

Dust, odour and litter can be particularly noticeable to neighbouring activities. The site is relatively isolated however, with the nearest neighbours being located ~130m west of the proposed working area.

Consequently, good relationships with neighbouring properties and businesses are paramount in helping to anticipate potential problems and avoid them. It must be ensured that: -

- All the neighbouring buildings know how to contact the site if they consider fugitive emissions to be a problem (contact details will be clearly visible on the site sign along with the Natural Resources Wales details);
- Any complaints are recorded and that problems, where possible, are dealt with promptly.

Sites of Special Scientific Interest (SSSI) / Special Areas of Conservation (SAC)

The site is located ~250m from Caeau Mynydd Mawr SAC and exists within the Supplementary Planning Guidance (SPG) zone for the same SAC.

Any developments proposed within SPG must offer a financial contribution in the form of a levy which is determined by the proposed development. This fee is calculated based on a flow chart contained within the Caeau Mynydd Mawr SAC SPG, which has been included in Appendix B.

Discussions have been held with Carmarthenshire County Council, and an agreed upon levy has been paid in order for the proposed development to continue without breaching the guidelines set out within the Caeau Mynydd Mawr SPG.

Nearby Sensitive Receptors (Within 1km)

Details of nearby sensitive receptors are available for review in Table 1 overleaf. Details include distance and direction from site, addresses and telephone contact details where available: -

Table 1 – Sensitive Receptors Identified Within 1km of the Site: -

Receptor Name	Receptor Address	Distance and Direction from Site	Company Details (if Applicable) and Telephone Contact Details
Unnamed Tributary of Afon Gwili	n/a	60m (S) 135m (E) 145m (NW) 505m (SW) 575m (NW)	n/a
Tŷ Llwyd Fâch	Tŷ Llwyd Fâch, Thornhill Rd, Llanelli SA14 6PT	140m (W)	n/a
Adept GRP	Unit 4/Heathfield Ind Est/Thornhill Rd, Llanelli SA14 6PT	250m (SE)	01269843355
Caeau Mynydd Mawr SAC	n/a	255m (N)	n/a
Caeau Ffos Fach SSSI	n/a	255m (N)	n/a
Broad Oak and Thornhill Meadows SSSI	n/a	270m (NE)	n/a
Pendragon Waste & Skip Hire Ltd	Tyllwyd Isaf, Thornhill Rd, Penygroes, Llanelli SA14 6PT	305m (SW)	01269844270
Caeau Lotwen SSSI	n/a	360m (SW)	n/a
Plas Y Bryn Nursing Home	Thornhill Rd, Cwmgwili, Penygroes, Llanelli SA14 6PT	420m (S)	01269844454
Afon Gwili	n/a	470m (SW)	n/a
Cwmgwili Village	Cwmgwili Penygroes Llanelli	655m (S)	n/a
Cae Gwynfryn SSSI	n/a	675m (SW)	n/a
Parc Menter Industrial Estate	Parc Menter Cross Hands Llanelli SA14 6RA	805m (NW)	NR Evans Logistics - 01269842330 Wincanton Logistics 01269833754 Combdrive – 01269834848 SA15 Car Sales - 07812335015 Absolute Motocross - 01269844009
Felin Fach Meadows (Cwmgwili) SSSI	n/a	920m (S)	n/a
Ron Skinner & Sons	11b Heol Parc Mawr, Cross Hands, Llanelli SA14 6RE	925m (N)	01495713400
Castell Howell Foods Ltd	Cross Hands Food Park Cross Hands Llanelli Carmarthenshire SA14 6SX	945m (NW)	01269846060
Shufflebottom Ltd	Business Park, Heol Parc Mawr, Cross Hands, Llanelli SA14 6RE	980m (N)	01269831831
Welsh Holiday Lettings	Preswylfa, Pontardulais Rd, Cross Hands, Llanelli SA14 6PD	980m (W)	n/a
Capel Hendre Park	55 Banc Y Ddraenen, Capel Hendre, Ammanford SA18 3SR	990m (E)	n/a

4.0 CONTROL MEASURES

Aerial Releases of Dusts, Fibres and Particulates

There are a few activities on-site that may create dust which could possibly drift off-site and cause an amenity nuisance. Such activities include: -

- Waste vehicle movements (vehicles may kick up dust during dry weather);
- The movement of legacy waste around the site;
- The reception of waste materials;
- The loading of materials into skips during the sorting procedure;
- The treatment of waste materials.

Site staff supervising individual waste handling operations shall, during the carrying out of those operations, undertake visual monitoring of aerial emissions.

On detection or notification of visible aerial emissions that are likely to be transported beyond the site boundary, immediate action shall be taken to stop the waste handling or treatment operations giving rise to the emission and to suppress the aerial emission from the waste. The incident and the remedial action shall be recorded in the site diary.

Vehicle wheels will be inspected upon leaving the site. Where they are deemed to be dirty, and where there is risk of dust kicking up as a result of their condition, wheels should be washed to clean them and to dampen dust. This will reduce the likelihood of mud and debris being deposited on haul roads, and dust being transported across surfaces and through the air.

The concrete pad located on site will also be washed if deemed to dusty or dirty as appropriate.

Odour

Given that the waste to be processed on site will consist of non-hazardous household, commercial and industrial materials, it is believed that odour will not be a significant issue on site. All waste processing and storage takes place inside covered skips which is an additional form of attenuation in the event that any odours are generated on site. Any waste that is deemed to be odorous will be dealt with in accordance with the Waste Acceptance procedure or turned away from site if deemed inappropriate or unsuitable for processing.

Control of Pest Infestations

The storage of waste or other materials stored on site can attract pests - scavenging animals, birds and other pests, including flies, can introduce substances into the environment that may spread disease.

Measures shall be implemented and maintained throughout the operational life of the site to control and monitor the presence of pests on the site. Pest bait boxes will be installed on site by a suitably qualified pest controller and checked and replenished accordingly where deemed necessary. An inspection of the facility for pest infestations shall be carried out on a daily basis by the site manager or someone appointed by him/her and shall be recorded in the site diary.

On detection or notification of pest infestations, or evidence of such, immediate action shall be taken to secure the attendance of a professional pest control contractor, to eliminate the pest infestation. The incident and the remedial action shall be recorded in the site diary.

Control of Litter

All waste inputs will be deposited on the concrete slab and sorted immediately on site arrival/deposition. This will reduce the potential problem of windblown litter from the site especially in conjunction with covered skips being utilised as the sole storage of material on site.

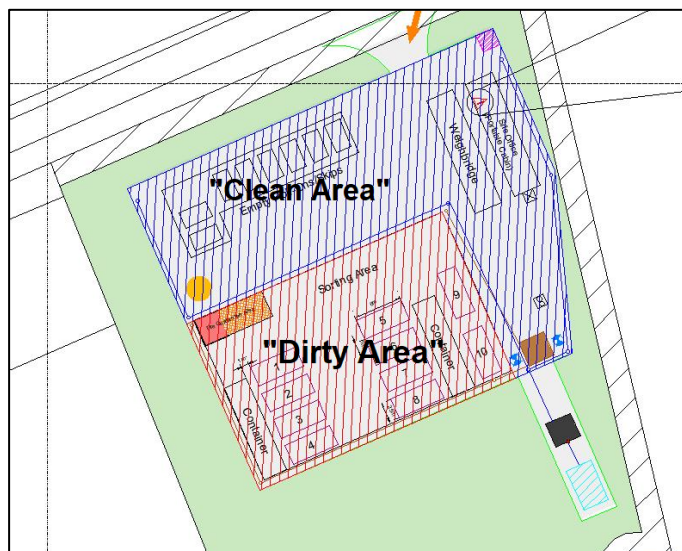
Incidences of litter may be observed during the sorting of waste into constituent waste streams using mechanical excavator. Staff will inspect the site daily and remove any litter which has accumulated. Any actions

required following a site inspection will be recorded in the site diary. In the event that litter does escape from the site, it shall be retrieved as soon as is practicable, and no later than one hour after the end of the working day.

Surface Water

The site is covered by an impermeable hardstanding slab which has essentially been separated into two definitive areas – a 'clean' area and 'dirty' area as visible in figure 1 below: -

Figure 1 – Separation of Slab into Clean and Dirty Areas



The clean area consists of an area bounding the northern, eastern and north-western boundaries of the site. Empty, unused skips will be stored on the hardstanding toward the north-west of the site, whilst the offices and weighbridge are also located on the clean area of the slab, toward the eastern boundary.

The clean area of the site will have a dedicated perimeter drain, into which surface water from the clean area of the site will collect. A clean surface water drain will also be present separating the clean area from the dirty area of the site. Clean surface water will enter into an oil interceptor and discharge to soakaway beyond the site to the south.

The dirty area of the site meanwhile will be where all processing, segregation and assorting will take place. In addition, filled skips will also be located on the dirty area of the site, whilst plant is also stored on this area of the slab when not in use and outside of operating hours. The quarantine area (see section 3.3) is also located on this area of the site and has its own dedicated perimeter drain.

Surface water from the dirty area of the site will enter a separate dedicated perimeter drain from that of the clean area. This drain will enter a tank toward the east of the site (specification TBD) from which water will be tankered as necessary away from site and disposed of at a suitably licenced and regulated facility.

By ensuring that all processing activity occurs on the dirty area of the slab, this will protect potentially hazardous substances from entering sensitive receptors (e.g. the stream to the south of the site) as the water will enter a tank and be disposed of away from the site.

The natural fall of the site is from NW to SE, and an incline will be incorporated into the slab design to direct surface water into the respective dirty and clean drainage systems.

There will be no point source emissions to groundwater or surface water from the activities, however, clean surface water from the clean area of the slab will be discharged to land by soakaway after passing through an oil interceptor to be incorporated into the design.

Table 2 overleaf provides the minimum specified standards for site surface water control systems.

Table 2 – Specified Standards for Drainage and Maintenance

Minimum Specified Standards of Design, Construction and Maintenance	
Drainage Systems	<p>Drainage to areas of impermeable hardstanding shall be provided by a drainage system separate into clean and dirty systems, with impermeable components which do not leak and shall ensure that:</p> <ul style="list-style-type: none"> • No liquid shall run off the hardstanding other than via the systems and; • Except where they may be lawfully discharged, all liquids entering the system are collected and disposed of accordingly.
Inspection and Maintenance	<p>All areas of impermeable hardstanding, drainage systems, containers, and storage areas for skips and containers: -</p> <ul style="list-style-type: none"> • Shall be inspected no less frequently than monthly, to ensure the continuing integrity and fitness for purpose of their construction, and the inspection and any necessary maintenance shall be recorded in the site diary; and • In the event of any damage occurring which breaches the integrity of the engineered containment so that it no longer meets the specified standards, the licence holder shall cease importing waste into or treating waste in the affected area, shall notify NRW immediately, and shall not recommence importing waste into or treating waste in the affected area until it has been repaired to a standard at least as good as the original specification.

Action to Take in the Event of a Spill on the Clean Area of Site

In the event that an accidental spillage or leak occurs on the clean area of the site, the following actions are to be taken: -

- Assess the risk of the contaminative material – safety should be the first priority;
- Apply appropriate PPE prior to containing the spill or leak;
- Confine the spill using spill kits. Responders should limit the spill area by blocking, diverting or confining the spill. The flow of liquid (if applicable) should be stopped before it has the chance to contaminate a water source – minimising the spill area and protecting clean area drains should be the top priority;
- At the same time as the above is being undertaken, the discharge pipe valve on the oil interceptor is to be closed as an additional precaution, ensuring that any fugitive spills which may have entered the clean system, despite the actions above, will not discharge to the environment;
- Stop the source. It is unlikely / improbable that a continuous source of contamination will occur on the clean area of the site due to the nature of the materials accepted on site. However, stopping the source of the spill can simply be a case of up-righting an overturned container or plugging a leak from a damaged container or similar. These actions must be undertaken to reduce the scope of the contamination event;
- Evaluate the incident and implement clean-up measures. Once the spill is confined and the leak has been stopped, a plan of action for implementing the clean-up must be enacted. Vacuums are one method of cleaning up large-volume spills. Absorbing spills is another common method of response. Mats, socks, pillows, booms, dikes and loose absorbents are found in the spill response kits, and each serves a different purpose during response. For example, in a large open area where the spill has been contained, mats are preferable. Loose absorbents meanwhile may be reserved for areas that are hard to reach with mats. Once the absorbents are saturated and the contaminated material has been safely isolated and controlled, this should be transported to the site quarantine area pending disposal at a suitably licenced facility;
- Decontaminate – the site, personnel and equipment should be decontaminated by removing or neutralising the hazardous materials that have accumulated during the spill. If the spill has occurred on the clean area of the site, care must be taken to ensure that any clean-up operations confine any contamination to the dirty water system of the site. The valve on the oil interceptor is to remain closed during any clean-up operations. If any contaminated water is identified to have entered the clean water system, this will be pumped from the interceptor to the dirty-water tank, ensuring contaminants do not enter the environment;
- The valve on the oil-interceptor is only to be reopened once all clean-up activities have completed, and after any assumed contaminated residual water in the interceptor is pumped to the dirty-water tank.

Mud or Dust on the Road

Whenever the site is receiving or despatching wastes, measures shall be provided, operated and maintained with the objective of preventing the deposit or tracking of mud or debris arising from the site onto public areas outside the site, which shall include public highways and areas of public access.

All vehicles leaving areas of the site which are operational or upon which engineering works are being carried out shall, before leaving the site, be checked for mud and cleaned as necessary, and shall be checked to ensure that they are clear of loose waste and that any waste being transported off site is secure.

In the event that mud, debris or waste arising from the site is deposited onto public areas outside the site, the following remedial measures shall be implemented immediately: -

- The affected public areas outside the site shall be cleaned;
- Traffic shall be isolated from sources of mud and debris within the site to prevent further tracking of mud and debris, and measures shall be taken to clear any such sources as soon as practicable.

An inspection of the facility for general dust levels shall be carried out daily by the site manager or someone appointed by him/her, and any actions required shall be recorded in the site diary.

Adverse Weather Conditions

Adverse weather conditions are unlikely to affect fugitive releases given the nature of waste materials accepted onto site and the frequency at which waste is removed from site.

In addition, skips will be covered and sealed, so the risk of fugitive releases after heavy rainfall events is further reduced.

Heavy rainfall is unlikely to have an impact given that the waste acceptance area is located on an area of processing slab with a dedicated drainage system discharging to a holding tank.

Strong winds may affect fugitive emissions in the form of litter blowing away from processing areas during separation into constituent parts. It is recommended that weather conditions, particularly strong winds are monitored in order to reduce the risk of litter blowing away during sorting.

Wastes are also removed from site on a regular basis meaning that the turnover of waste onsite is expected to be quick. Furthermore, the lack of stockpiles and the use of covered skips further mitigates against fugitive litter blowing away from the processing area.

Snow and/or ice can have an effect on the ability of waste carrying vehicles to get to site. Should vehicles be prevented from making it to or from site, waste may have to be stored on site for slightly longer than when the site is operating normally. This is unlikely to have an impact on fugitive releases given the type of waste accepted onto site and the likelihood that the quantities of waste on site would not be increasing in such circumstances.

Housekeeping

Good housekeeping practices on site will minimise the potential for fugitive releases. These will include: -

- The appropriate storage of waste at the end of each working day;
- Regular inspection of drainage systems and cleaning when deemed necessary;
- General housekeeping and inspection procedures maintained;
- Ongoing maintenance of site surface and site boundary;
- Ongoing maintenance of site plant and machinery.

5.0 MONITORING

The site manager will ensure, by the implementation of a monitoring plan, that fugitive releases from the site are limited and where possible stopped and that by effective mitigation the impacts of any fugitive releases shall be reduced. The monitoring of fugitive releases shall include: -

- Daily site walkovers;
- End of day litter checks/picks; and
- Prompt response to any complaints.

Operatives shall be fully conversant with the contents of the Permit and Fugitive Releases Management Plan and will be relied upon to remain observant and to draw attention to any non-conformances, adverse operating conditions and any mitigation or management failure.

Records shall be kept of any monitoring/inspection carried out.

Monitoring Records

Records of site inspections are to be kept after each visit.

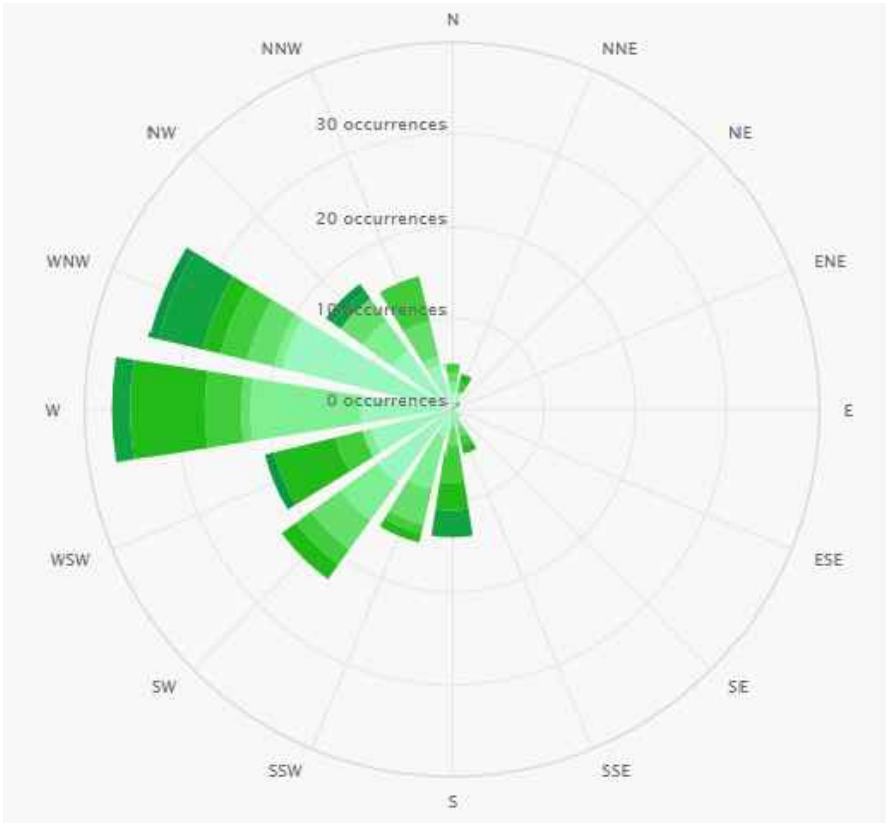
Any adverse operating conditions, non-conformances, complaints and mitigation/management failure resulting in an accident or noncompliance with the Permit shall be recorded in the site diary.

APPENDIX A

Drawings

- Site Boundary
- Quarantine Area - 3.3m x 3m x 3m (1m Headspace) & Keep Clear Zone (6m)
- Clean - Storm Water Drainage
- Sorting Area Drainage
- Storage Tank for Sorting Area Runoff
- Oil Interceptor
- Soakaway
- Water Points
- Fire Access Route
- Assembly Point
- Site Emergency Information & Site Plan
- Made Ground
- Natural Ground
- Skips
- Fire Extinguisher
- Cylinders
- 40,000 Liter Water Tank
- Emergency Non Return Valve

Wind Rose



Job:
JD Mckenna

Title:
FPMP Site Plan

Date: March 2021

Scale: NTS

Drawn by: AJD

Checked by: SO

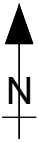


ExCAL House,
Capel Hendre Ind. Est.,
Ammanford,
Carmarthenshire,
SA18 3SJ
Tel: 01269 831606
Fax: 01269 841867
Website: www.excaluk.com
E-mail: info@excaluk.com

Drawing No: 275-01-06.D04

Revision No: B Date: 11/03/2021





United Kingdom



No.	Receptor Name	Receptor Address	Distance and Direction from Site	Company Details (if Applicable) and Telephone Contact Details
1	Unnamed Tributary of Afon Gwili	n/a	60m (S) 135m (E) 145m (NW) 505m (SW) 575m (NW)	n/a
2	Tŷ Llwyd Fâch	Tŷ Llwyd Fâch, Thornhill Rd, Llanelli SA14 6PT	140m (W)	n/a
3	Adept GRP	Unit 4/Heathfield Ind Est/Thornhill Rd, Llanelli SA14 6PT	250m (SE)	01269843355
4	Caeau Mynydd Mawr SAC	n/a	255m (N)	n/a
5	Caeau Ffos Fach SSSI	n/a	255m (N)	n/a
6	Broad Oak and Thornhill Meadows SSSI	n/a	270m (NE)	n/a
7	Pendragon Waste & Skip Hire Ltd	Tyllwyd Isaf, Thornhill Rd, Penygroes, Llanelli SA14 6PT	305m (SW)	01269844270
8	Caeau Lotwen SSSI	n/a	360m (SW)	n/a
9	Plas Y Bryn Nursing Home	Thornhill Rd, Cwmgwili, Penygroes, Llanelli SA14 6PT	420m (S)	01269844454
10	Afon Gwili	n/a	470m (SW)	n/a
11	Cwmgwili Village	Cwmgwili Penygroes Llanelli	655m (S)	n/a
12	Cae Gwynfryn SSSI	n/a	675m (SW)	n/a
13	Parc Menter Industrial Estate	Parc Menter Cross Hands Llanelli SA14 6RA	805m (NW)	NR Evans Logistics - 01269842330 Wincanton Logistics 01269833754 Combidrive - 01269834848 SA15 Car Sales - 07812335015 Absolute Motocross - 01269844009
14	Felin Fach Meadows (Cwmgwili) SSSI	n/a	920m (S)	n/a
15	Ron Skinner & Sons	11b Heol Parc Mawr, Cross Hands, Llanelli SA14 6RE	925m (N)	01495713400
16	Castell Howell Foods Ltd	Cross Hands Food Park Cross Hands Llanelli Carmarthenshire SA14 6SX	945m (NW)	01269846060
17	Shufflebottom Ltd	Business Park, Heol Parc Mawr, Cross Hands, Llanelli SA14 6RE	980m (N)	01269831831
18	Welsh Holiday Lettings	Preswylfa, Pontardulais Rd, Cross Hands, Llanelli SA14 6PD	980m (W)	n/a
19	Capel Hendre Park	55 Banc Y Ddraenen, Capel Hendre, Ammanford SA18 3SR	990m (E)	n/a

Job:
JD Mckenna


Title:
Sensitive Receptor (-1km)

Date: January 2021

Scale: NTS

Drawn by: AJD

Checked by: SO



**ExCAL House,
Capel Hendre Ind. Est.,
Ammanford,
Carmarthenshire,
SA18 3SJ**
Tel: 01269 831606
Fax: 01269 841967
Website: www.excaluk.com
E-mail: info@excaluk.com

Drawing No: 275-01-06.D05

Revision No:

Date: 29/01/2021

APPENDIX B

Caeau Mynydd Mawr SAC – Supplementary Planning Guidance

***Supplementary
Planning
Guidance***

***Caeau
Mynydd Mawr
Special Area of
Conservation***



***Adopted
December 2014***

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1.0 INTRODUCTION

Purpose of Guidance

- 1.1 This Supplementary Planning Guidance (SPG) is an elaboration and clarification of the policies and provisions of the Carmarthenshire Local Development Plan (LDP) adopted 10 December 2014. The Plan level HRA undertaken in support of the LDP recommended that the adoption of this SPG is pivotal to mitigating likely significant effects at a strategic level. In this regard, the SPG provides specific guidance in relation to the consideration of proposals for potential developments impacting upon the Caeau Mynydd Mawr Special Area of Conservation (SAC) and the need to establish a management strategy to ameliorate for the loss of and secure the ongoing and future management of habitat used by the Caeau Mynydd Mawr SAC marsh fritillary butterfly metapopulation. The SPG focuses on the Caeau Mynydd Mawr SAC Marsh Fritillary core metapopulation area (referred to in this document as the SPG area).
- 1.2 The SPG area has been robustly defined by analysis of the marsh fritillary records reported since 1990 and is based upon a 'habitat landscape' extending out from the core SAC units, taking into account the quality, quantity and location of the habitats as well as connectivity considerations for marsh fritillary butterflies to move through the countryside (landscape permeability). This adopts the best available scientific knowledge to reflect the greater accuracy and understanding we now have of marsh fritillary metapopulation dynamics in the Cross Hands area. The precautionary 2km radius used within the current conservation objectives for the SAC will be updated shortly as part of the core management plan review.
- 1.3 The existing conservation objectives for the SAC set a minimum threshold of 50ha habitat in suitable condition to support populations of marsh fritillaries. This threshold is derived from population modelling and represents the smallest amount of habitat needed to maintain a viable metapopulation in the long term. However this SPG provides a framework for sufficient land to be managed in order to seek to provide a minimum 100ha of suitable habitat. This figure takes account of the improved understanding of the extent of the marsh fritillary metapopulation in the Cross Hands Area and will ensure that, even with fluctuations in habitat condition, sufficient habitat will always be available to meet the 50ha minimum. The SPG provides a mechanism for funds to be secured from planning permissions issued in order to mitigate for the loss of habitat that is likely to occur as a result of development. It also similarly mitigates for any reduction in the permeability of the landscape within the SPG area due to development. This enables planning permission to be granted without the need for an Appropriate Assessment in every instance. (See EU Habitats Directive 1992 which transposed into British law by the Conservation of Habitats and Species Regulations 2010 as amended) within the SPG area.
- 1.4 This SPG clarifies the means in which the Council will secure the ongoing and future management of habitat used by the marsh fritillary butterfly meta population with the use of developer contributions through planning obligations as part of the granting of planning permission for specific classifications of development within the SPG area. Such contributions will support and resource the delivery of mitigation measures (examples of which are set out within this SPG).
- 1.5 The SPG provides a coherent basis for mitigation to be achieved simplifying the Habitats Regulation Assessment (HRA) process for specific projects, particularly the consideration of potential 'in combination' effects. Any Tests of Likely Significant

Effect (TLSE) conducted by the Authority when assessing planning applications within the SPG area, should generally be able to conclude that there will be no likely significant effect (alone and in combination) due to loss of habitat or connectivity resulting from the proposed development on the features (and their conservation objectives) for which the Caeau Mynydd Mawr SAC has been designated. In most, if not all, cases this should avoid the requirement for regulation 61 Appropriate Assessments (AA) for each application thus facilitating a smoother delivery of the permissions required for development. It will also enable a proactive approach to be taken to the management of the SAC and compliance with the Habitats Regulations.

- 1.6** The potential impact of losing connectivity to supporting habitat within the metapopulation 'core landscape', defined by the SPG area, will be addressed by securing the appropriate management of areas suitable for the marsh fritillary and also to provide links (such as areas of open grassland of suitable size) between areas of supporting habitat.
- 1.7** Where planning permission for development is approved within the SPG area, a contribution will be required from the developer which has been calculated to be sufficient to fund the management of twice that area lost to development.
- 1.8** This SPG establishes a transparent and consistent approach to securing contributions towards habitat management. It also seeks to make applicants aware, at an early stage of the development process, of the Council's expectations in respect of the level of contributions required. Upon adoption this SPG will be a material consideration in the determination of planning applications and appeals for development proposals located within the SPG area as set out within this SPG.
- 1.9** The Council has worked alongside a range of partners in the development of this SPG and the associated background evidence. These include:

 - Natural Resources Wales;
 - JACOBS (consultants to the Council);
 - Menter Cwm Gwendraeth;
 - The Butterfly Conservation Trust.
- 1.10** The LDP does not repeat national policy statements. The Council will therefore utilise national policy to assist in determining development proposals that have potential to impact on international and nationally designated sites. Such policies also underpin the implementation of this SPG.
- 1.11** The preparation of this SPG has been subject to a 6-week public consultation exercise with comments invited on its content. The consultation has been conducted in a manner consistent with that set out within the Delivery Agreement for the LDP. It has been adopted concurrently with the LDP. It should be noted that the Plan should be read in its entirety in formulating any proposals.

2.0 LEGISLATIVE AND POLICY CONTEXT

National Policy Context

Planning Policy Wales (Edition 7, July 2014)

- 2.1. Chapter 3 provides guidance on the use of developer contributions. Specific regard should be given to section 3.7 which provides guidance on negotiating planning obligations and confirms that they should only be sought where they are necessary to make a proposal acceptable in land use planning terms. It also states that “Planning obligations are useful arrangements to **overcome obstacles which may otherwise prevent planning permission from being granted. Contributions from developers may be used to offset negative consequences of development**, to help meet local needs, or to secure benefits which will make development more sustainable. It is essential that arrangements are fair to both the developer and the community, that the **process is as transparent as possible**, and that development plans provide guidance on the types of obligations which authorities may seek from developers”. Chapter 3 also advises on CIL – reference should be made 2.17 of this SPG in this regard.
- 2.2 Chapter 5 also provides guidance which is relevant to the application and interpretation of this SPG.
- 5.1.3 states that “A key role of the planning system is to ensure that society’s land requirements are met in ways which do not impose **unnecessary constraints on development** whilst ensuring that all reasonable steps are taken to safeguard or enhance the environment. However, **conservation and development can often be fully integrated**. With careful planning and design, not only can the potential for conflict be minimised, but **new opportunities for sustainable development** can also be created.”
 - 5.2.8 states that “The planning system has an important part to play in meeting biodiversity objectives by **promoting approaches to development which create new opportunities to enhance biodiversity, prevent biodiversity losses, or compensate for losses where damage is unavoidable**... Ways in which the adaptation needs of biodiversity could be considered include identifying the scope for **minimising or reversing the fragmentation of habitats** and improving **habitat connectivity** through the promotion of wildlife corridors. Local planning authorities should ensure that development minimises impact within **areas identified as important** for the ability of species to adapt and/or to move to **more suitable habitats**”
 - 5.3.9 states that “The Assembly Government will ensure that international responsibilities and obligations for conservation are fully met, and that, consistent with the objectives of the designation, statutorily designated sites are **protected from damage and deterioration**, with their important features conserved by **appropriate management**.”
 - 5.5.3 states that “In some cases it will be necessary to refuse planning permission on conservation grounds. However, **local planning authorities must always consider whether environmental issues could be adequately** addressed by modifying the development proposal or by attaching appropriate planning conditions **or obligations**. Where this is not possible and the adverse effect on the environment clearly outweighs other material considerations the development should be refused.”

Technical Advice Note (TAN) 5, Nature Conservation and Planning (2009):

- 2.3** TAN 5 provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. It provides an overview of all relevant legislation within the field and “demonstrates how local planning authorities, developers and key stakeholders in conservation can work together to deliver more sustainable development that does not result in losses from the natural heritage but instead takes every opportunity to enhance it” (para 1.6.1)
- 2.4 states that local planning authorities should..” adopt a step-wise approach to avoid harm to nature conservation, minimise unavoidable harm by mitigation measures, offset residual harm by compensation measures and **look for new opportunities to enhance nature conservation...**”
 - 3.2.6 states that “Local development plans should include policies in respect of the conservation of the natural beauty and amenity of the land; such policies should encourage the management of features of the landscape which are of major importance for wild flora and fauna. Suitable planning conditions and **obligations may serve to promote such management.**”
 - 3.4.2 states that “Local planning authorities **may adopt SPG to provide more detailed, locally relevant guidance** for:
achieving more **sustainable solutions to development problems and opportunities that respect natural processes and ecological systems...**
developers to **avoid adverse effects** on nature conservation, **minimise unavoidable effects by mitigation measures** and **compensate** for residual effects on nature conservation, and providing **new benefits** for conservation, using examples of different types of development and different conservation scenarios and initiatives...
the **creation of new wildlife habitats** and the enhancement of nature conservation interests..”
 - 4.4.1 states that “The development control process is a critical stage in delivering the protection and enhancement of nature conservation required by PPW. The following can help to achieve these objectives...securing necessary measures to **protect, enhance, mitigate and compensate** through planning conditions and **obligations**”
- 2.4** Section 4.7 confirms that planning obligations can also be an effective way of **avoiding potential adverse effects on nature conservation enabling a permission to be granted.** It states that if there is a choice between imposing conditions and entering into a planning obligation, the imposition of a condition is preferable, however in many circumstances, for nature conservation matters, obligations provide a more flexible, but equally reliable and enforceable, means of controlling development. It adds that obligations are “**particularly useful for delivering the measures in a proposed development to avoid, mitigate or compensate for potential harm to nature conservation and to ensure proposed natural heritage benefits are delivered in a timely and appropriate way, where these have been material considerations in the planning decision.**”
- 2.5** Section 4.7.1 states that obligations may be appropriate for providing:
- for the **management of land and conservation** of natural heritage features associated with development including any **compensatory areas**;
 - **monitoring systems** and the means of reporting, reviewing and adjusting, monitoring and mitigation and compensation measures;
 - **new habitats or enhancing** existing habitats, **on or off-site**;

- information and interpretation, for example, about the geological interest of a site or feature;
 - improved access for all to sites or features of nature conservation interest;
 - new nature reserves or the funding of nature reserve management or provision;
 - warden or ranger services to help manage recreational or other pressures on land on or off-site;
 - measures to avoid harm to protected species in buildings or elsewhere;
 - other appropriate financial contributions to nature conservation.
- 2.6 TAN 5 confirms that “whilst the above is not an exhaustive list but illustrates the scope of use of planning obligations. Local planning authorities and developers are encouraged to use obligations in a positive and innovative way in accordance with the Assembly Government’s policies set out in PPW.”

Legislation - developer contributions/obligations

- 2.7 *What are developer contributions?* In order to create sustainable communities the Council wants to ensure that the necessary infrastructure is put in place to meet local community needs. This includes not only the physical infrastructure such as roads and utilities that enable development to proceed, but also the community facilities and environmental improvements which will ensure occupiers of those developments have adequate access to services such as education, healthcare and leisure activities which will improve their quality of life. The Council will require developers to fund or contribute directly to the necessary improvements or new provision so as to mitigate for the impact of their proposals (to include measures which secure the maintenance and improvement and biodiversity of the area). These measures are known as “developer contributions”.
- 2.8 *What are planning obligations?* Developer contributions will normally be secured through a “planning obligation”. This is a legal commitment by the developer to secure a contribution to address community and infrastructure needs associated with development. The legislative basis for planning obligations is Section 106 of the Town and Country Planning Act 1990 as amended by Section 12 of the Planning and Compensation Act (1991). Typically obligations are negotiated in the context of granting planning permission and are used to secure provisions to enable the development of land that are not suitable or capable of being contained in a condition attached to the planning permission.
- 2.9 Planning obligations are intended to make acceptable development which would otherwise be unacceptable in planning terms. The legislation allows planning obligations to:
- restrict development or use of the land;
 - require operations or activities to be carried out in, on, under or over the land;
 - require the land to be used in a specified way; or
 - to require payments to be made to the authority either in a single sum or periodically. (PPW Chapter 3)
- 2.10 Planning obligations secured by way of a Section 106 agreement or Unilateral Undertaking (also called a Unilateral Obligation), are binding on the land and are therefore enforceable against all successors in title.
- 2.11 Detailed policy guidance on how planning obligations should be properly negotiated and used by Planning Authorities is provided by **Planning Obligations Welsh Office Circular 13/97 (8th July 1997)**. This policy requires that planning obligations should

be necessary; relevant to planning; directly related to the proposed development; fairly and reasonably related in scale and kind to the proposed development, and; reasonable in all other respects.

- 2.12.** Annex B of Circular 13/97 provides further guidance on how these tests should be met. Paragraph B2 of Annex B states that planning obligations ‘should only be sought where they are necessary to make a proposal acceptable in land-use planning terms’ and that ‘Planning obligations may relate to matters other than those covered by a planning permission, provided there is a direct relationship between the planning obligation and the planning permission... but they should not be sought where this connection does not exist or is too remote..’
- 2.13** Paragraph B9 of Annex B to the Circular provides some illustrations of what might be ‘reasonable’ in the terms of the policy test. It requires that what is sought or offered must be: **Necessary from a practical point of view** to enable the development to go ahead and **Necessary from a planning point of view** and is so directly related to the proposed development and to the use of the land after its completion that the development ought not to be permitted without it.
- 2.14** **All contributions levied within the SPG area will be utilised towards funding the implementation of specific habitat management initiatives within that same SPG area. This area has been robustly defined.** This satisfies the requirements of the circular in relation to the tests for the use of planning obligations and the SPG is strongly rooted within national and local planning policy. The SPG also adheres to paragraph B9 of Annex B in that it provides the framework for contributions to address the below tests:
- **Necessary from a practical point of view:** There are barriers to giving permission for schemes that comply with the development plan because a precautionary principle approach is unable to conclude that there are no potential ‘in combination effects’ on the SAC and thus a series of appropriate assessments are required;
 - **Necessary from a planning point of view:** A long term and suitably resourced strategy is required to increase managed land so as to accord with the conservation objectives of the SAC. The Plan level HRA undertaken on the LDP states that the adoption of this SPG is required.

Future Reform of Planning Obligations and the Community Infrastructure Levy

- 2.15** The Barker Review of March 2004 proposed that Government should use tax measures to extract some of the windfall gain that accrues to landowners from the sale of their land for residential development. The Government considers this principle applies for both residential and non-residential development.
- 2.16** In November 2007 the Government introduced the Planning Bill into Parliament. This became law via the 2008 Planning Act (see 2.17 below).
- 2.17** Part 11 of the Planning Act 2008 provided for the introduction of the Community Infrastructure Levy (CIL) to fund the provision of infrastructure in England and Wales. The Community Infrastructure Levy Regulations came into force on 6th April 2010. Regulation 122(2) gives legal effect to three of the tests from Circular 13/97, as follows: “a planning obligation may only constitute a reason for granting planning permission if it complies with the three tests...namely, that it is:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.”

- 2.18** The Council is currently considering the application of CIL in the context of Carmarthenshire. The charging schedule and other evidence that underpins CIL within Carmarthenshire will need to take account of the requirements of this SPG. Reference should also be given to guidance set out in para 3.7 of PPW as well as the LDP Planning Obligations SPG. The provisions of the CIL charging schedule should consider the prioritisation of the provisions of this SPG as an acknowledgement of the Council's statutory responsibility under the Conservation of Habitats and Species Regulations. In applying the principle of prioritisation and in order to achieve the objectives of the SPG, the Council will (in appropriate instances) negotiate any agreed level of contribution on a case by case basis.
- 2.19** This SPG provides a framework through which the drawing down of finances from a centralised CIL resource pool may be considered to fund habitat management. This is because it is a strategic/area based policy (focused on the SPG area) rather than a localised/site specific intervention.
- 2.20** The drawing down of CIL funds to resource this SPG may the potential to facilitate vital strategic investment in the area's hard and soft infrastructure because it provides the required mitigation to satisfy the Habitats and Species Regulations. Paragraph 2.23 below confirms the strategic importance of the SPG area in developmental/ infrastructural terms and this further consolidates the link between the SPG and CIL. The provisions of this SPG and its relationship a potential for the upcoming CIL will be reviewed concurrent with its preparation.
- 2.21** Reference should be made to the LDP Planning Obligations SPG, together with Appendix 3 (useful contacts) for further information on the use of developer contributions in Carmarthenshire and the implementation of SPG.

Local Policy Context

Local Development Plan

- 2.22** The LDP is the statutory development plan for the County. Its spatial strategy is underpinned by the identification of three growth areas which are supplemented within the hierarchy by a range of settlements of differing sizes with their position within the hierarchy determined by virtue of their respective merits in terms of sustainability and the services and facilities they offer. The Plan is informed, and supported by, extensive Habitats Regulations Assessment (HRA) and Sustainability Appraisal (SA-SEA) input.
- 2.23** The identification of Ammanford/Cross Hands Growth Area 3 (GA3) reflects the high population levels and the availability of an extensive range of services and facilities. The area is well served by those facilities which are vital to supporting the principles of sustainability and are capable of accommodating a proportionally high level of growth. It represents a large and established urban area located on sustainable transport routes. The area's regional or sub regional status is recognised through the Wales Spatial Plan.
- 2.24** The detailed assessment of GA3 within the Plan Level HRA recommended that a mitigation strategy is required to ameliorate the loss of habitat used by the SAC

marsh fritillary metapopulation. As a result, the LDP includes a commitment to prepare this SPG. Subject to the preparation and implementation of this SPG, the HRA considered that there will be no significant effects on the European site network (primarily the Caeau Mynydd Mawr SAC) as a result of the LDP proposals in Growth Area 3.

- 2.25** Policy GP3 (Planning Obligations) provides the over arching context for the use of developer contributions and is set out below:

‘GP3 Planning Obligations

The Council will, where necessary seek developers to enter into Planning Obligations (Section 106 Agreements), or to contribute via the Community Infrastructure Levy to secure contributions to fund improvements to infrastructure, community facilities and other services to meet requirements arising from new developments.

Where applicable, contributions will also be sought towards the future and ongoing maintenance of such provision either in the form of initial support or in perpetuity.

In implementing this policy schemes will be assessed on a case-by-case basis’.

- 2.26** The LDP does not repeat national policy statements. The Council will therefore utilise national policy to assist in determining development proposals that have potential to impact on international and nationally designated sites. Such policies also underpin the implementation of this SPG. An overview of the national policy context has been previously provided, however particular regard should be given to paragraphs 5.3.9 and 5.5.3 of PPW along with paragraph 4.4.1 of TAN 5. Policy EQ7 below provides sets the provisions for consideration of such matters in relation to Caeau Mynydd Mawr SPG Area.

‘EQ7 Development within the Caeau Mynydd Mawr SPG Area

Proposals will be permitted where they accord with the Council’s commitment to promote and contribute to the delivery of the Conservation Objectives of the Caeau Mynydd Mawr Special Area of Conservation (CMM SAC) in line with the Habitats Directive. Where applicable, proposals in the SPG area will be required to contribute towards increasing the quality and amount of suitable habitat for Marsh Fritillary butterfly available within the SPG Area. The SPG Area is defined on the Proposals Map.

In order to achieve these objectives, and to mitigate for the loss of potential supporting habitat and connectivity for the marsh fritillary butterfly that may result through the development, the Council will, where applicable, seek to secure Planning Obligations (in accordance with policy GP3 and the provisions of the SPG for the CMM SAC) from relevant developments within the SPG area. The agreed contribution will be negotiated on a case by case basis subject to the provisions and requirements of the CMM SAC SPG.

6.6.41 Developments can proceed within the Caeau Mynydd Mawr SPG Area subject to there being no demonstrable likely significant effect upon the Caeau Mynydd Mawr Special Area of Conservation (CMM SAC). To this end, the Council will (where appropriate) seek developer contributions in accordance with the provisions of

the Caeau Mynydd Mawr Supplementary Planning Guidance (CMM SAC SPG). In order to ensure the LDP's compliance with the Habitats Regulations, the Council will (where appropriate) give priority to securing those obligations in respect of the SAC. The Council may also (where appropriate) seek further detailed information from developers to inform the determination of planning applications.

6.6.42 The Caeau Mynydd Mawr SPG Area is identified on the proposals map. Reference should be made to the adopted CMM SAC SPG, together with Policies H1 and SP7 and Appendix 2 of this Plan.

6.6.43 In providing certainty and spatial focus, policy EQ7 does not advocate a rigid/blanket approach to calculating the amount of 'chargeable' development. Reference should be made to the SPG, particularly in terms of 'in kind' contributions.'

2.27 Regard is also afforded to the following relevant LDP policies:

- SP14 Protection and Enhancement of the Natural Environment;
- EQ4 Biodiversity;
- EQ5 Corridors, Networks and Features of Distinctiveness.

2.28 In elaborating upon 2.25 and 2.26 above, this SPG provides the mechanism to secure developer contributions to fund habitat management within the SPG area set out in Appendix 1. All chargeable development (see 5.7) that is given planning permission within the SPG area will be subject to the provisions of the contribution levy set out in Section 5 of this SPG.

2.29 Furthermore, all land use allocations potentially subject to the provisions of this SPG are identified within the relevant appendices of the LDP written statement.

2.30 The Council recognises that the provisions of this SPG must take priority over all other planning obligations within the SPG area. This reflects the duties placed upon it as a Competent Authority under the Conservation of Habitats and Species Regulations 2010. In applying the principle of prioritisation and in order to achieve the objectives of the SPG, the Council will (in appropriate instances) negotiate any agreed level of contribution on a case by case basis. Reference should be made to the LDP Planning Obligations SPG for further information on the wider use of obligations within the County.

3.0 CAEAU MYNYDD MAWR SAC CONDITION AND CONSERVATION OBJECTIVES

- 3.1** The SAC has been designated as it contains habitats and species that are rare or threatened within a European context namely:
- Marsh Fritillary butterfly, for which this is considered to be one of the best areas in the United Kingdom;
 - *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils for which the area is considered to support a significant presence.
- 3.2** The SAC lies at the centre of a wider area that sustains one of Wales' most important marsh fritillary populations. The butterfly functions in a meta-population – a group of local (smaller) populations connected by migrating individuals. The marsh fritillary requires large areas of continuous or closely connected marshy grassland in order to survive in the long term. The food plant on which the eggs are laid, and on which larvae feed is devil's bit scabious (*Succisa pratensis*), these plants need to be abundant throughout the habitat in order to support the butterfly. The marshy grassland that supports the butterfly and its food plant will also include species such as purple moor grass, sweet vernal grass, greater bird's foot trefoil, whorled caraway, sneezewort, ragged robin and wild angelica.
- 3.3** While the marsh fritillary population in and around the Caeau Mynydd Mawr SAC is one of the most important in the United Kingdom it is threatened by loss of habitat as a result of development, and also by the deterioration in the condition of its habitat due to inappropriate management. Over-grazing results in the loss of the food plant, and under grazing in scrub encroachment which similarly results in a loss of the food plant.
- 3.4** The conservation objectives for the SAC seek to establish 50ha of habitat within management, however this SPG provides a framework for sufficient land to be managed in order to seek to provide a minimum 100ha of suitable habitat.
- 3.5** The site location plan of the SAC is set out in Appendix 2.

4.0 JUSTIFICATION AND SUPPORTING EVIDENCE

Overview

- 4.1** Cross Hands and a number of the surrounding settlements through the Strategic Sustainable Settlement Framework form part of the Ammanford/Cross Hands Growth Area as defined within the LDP. Its identification forms an important element of the plan's sustainable settlement strategy providing a focus for the provision of growth within County both in terms of housing and employment land. The Cross Hands area also sustains one of Wales' most important populations of the marsh fritillary butterfly a species that requires large areas of continuous or closely connected habitat to survive in the long term. Caeau Mynydd Mawr SAC lies at the centre of this area and the marsh fritillary is a feature of this SAC.
- 4.2** As part of the statutory responsibility of the Council, under the Conservation of Habitats and Species Regulations 2010 as the relevant "competent authority", development proposals shown (at the detailed assessment stage) to have an adverse significant affect upon the qualifying interest (or features), conservation objectives and integrity (in relation to the site's ability to support its objectives) of the SAC – alone or in combination with other plans or projects – which do not provide for, or are unable to achieve an acceptable standard of mitigation should not be permitted.
- 4.3** This SPG resources an integrated management scheme to provide the required mitigation. Whilst providing this mitigation, the SPG also satisfies the tests set out in WG circular 13/97 and implements the recommendations of the Plan level LDP HRA undertaken.
- 4.4** Further clarification on the policy and practical justification of seeking developer contributions to resource this SPG is provided in Section 2.

Previous Planning Solutions

- 4.5** Precedents have been set, both in terms of agreements negotiated and at planning appeals. For the following residential schemes development the sums agreed were £1,000 per open market dwelling.
- Land at rear of 14-20 Heol Y Parc, Cefneithin;
 - Carmarthen Road, Cross Hands;
 - Cross Hands West;
 - Cross Hands East.
- 4.6** Although the above approaches relate to the provisions required in the determination of individual planning applications, they are important for noting particularly because the appropriateness of securing planning obligations for habitat management have been tested and the Appropriate Assessment requirements met. Reference can also be made to the SPG prepared by the Council to elaborate upon and clarify the policies and provisions of the Carmarthenshire Unitary Development Plan (UDP) in relation to the Caeau Mynydd Mawr SAC. This was adopted by the Council in February 2014.

Habitat Management Specification

4.7 The habitat management specification report commissioned to support the preparation of this SPG undertakes to:

- (a) Provide the criteria by which land acquired through this SPG will be managed to continue to provide Marsh Fritillary habitat, if it is already present;
- (b) Provide criteria by which land acquired through the SPG will be restored to create the opportunity for suitable and good condition habitat to become established;
- (c) To provide a framework to measure the success of the habitat management scheme.

This allows developers to gain an appreciation on what their contributions will be committed towards resourcing.

4.8 In order to comply with EU regulations, the habitat management objective is to provide 50 hectares of managed habitat with at least 10 hectares in good condition over the period of the LDP for the metapopulation of the Caeau Mynydd Mawr SAC. The SPG however seeks to provide for a minimum of 100ha of habitat within the SPG area. In terms of baseline information: the core landscape area, as defined through this SPG, contains approximately 1578.50 hectares that could be suitable for marsh fritillary based on the 2005 Phase 1 habitat mapping. However, the 2010 habitat quality mapping demonstrated that only 272.6 hectares were considered as capable of supporting breeding habitat and 147ha of this were in poor condition, demonstrating the need for proactive policy intervention. They also clarify that there is still a large amount of potential or suitable habitat land available within the overall SPG area of 5,600 ha and it therefore mediates the potential acquirement costs of land parcels as there is a limited premium on potential manageable land. This aids the deliverability potential of the SPG in affordability as well as practical terms.

4.9 The management and monitoring of the land acquired under the SPG is implemented by a project officer and associated governance structure whilst there is also considerable scope for partnership working with the local community. Further reference should be given to Section 6 (monitoring) in this regard.

4.10 There are a number of management options available and are grazing based, using appropriate breeds of cattle or ponies in conjunction with scrub clearance to maintain the appropriate vegetation structure for marsh fritillary. In habitat patches that are not currently in good condition other management techniques will need to be employed subject to survey results.

4.11 The management is resourced by developer contributions and delivered through this SPG. The cost implications for each management initiative will be unique however they could include a mixture of both capital and revenue expenditure. An example is set out below in terms of a parcel of land newly acquired for management. Reference should be made to Section 5 of this SPG for information on how such overheads/cost headings have been factored into the SPG developer contribution tariff rates.

- Acquiring of land and associated costs (eg legal fees);
- Delivery of appropriate management option;
- Administration and monitoring;
- On costs – salaries, office etc.

- 4.12** Using the data reviewed and the experiences recorded on other schemes, the proposed management options have been set out depending on the nature of the existing habitat. At this stage the management options are simplistic and are only intended as a guide. As each new site/ area is brought in to the SPG management area, it will require its own specific management plan depending on the prevailing conditions, resources available and proximity to other sites already under management. Reference should be made to Section 5 of this SPG for information on how such overheads/cost headings have been factored into the SPG developer contribution tariff rates. Guidance on prevailing conditions can be gleaned from paragraph 3.3.1. of the Caeau Mynydd Mawr Habitat Management Specification Report compiled by JACOBS in December 2012.
- 4.13** A series of management options (as clarified within the SPG Habitat Specification Report) are set out below. The SPG delivers these interventions which are managed on a day to day basis by the project officer.
1. Livestock Grazing;
 2. Removal of intensive grazing, followed by scrub clearance followed by low intensity livestock grazing;
 3. Mowing and scrub clearance followed by low intensity stock grazing;
 4. Seeding and/or plug planting devil's bit scabious with 3 month stock grazing.
- 4.14** The monitoring and review of this SPG is essential for ensuring ongoing compliance with the Conservation of Habitats and Species Regulations 2010 as well as the requirements set out in PPW and Circular 13/97 in relation to the tests for the use of planning obligations. Further information on the monitoring and management of this SPG and resultant management projects is provided in Section 6.

The Supplementary Planning Guidance Area

- 4.15** The SPG area denotes the area from which contributions will be secured and where habitat management will be delivered. The defining of this area has been informed by robust evidence in that it is underpinned by meta population theory and habitat mapping work undertaken in the area and has also benefitted from planning and technical inputs. **The SPG area identified on the LDP proposals map and is set out in Appendix 1 of this SPG.**
- 4.16** The SPG Area Report commissioned to support the preparation of this SPG provides a full account of how the area has been defined. This includes a review of key considerations, what data has been used and how the baseline data has been manipulated. Regard should be given to the references set out in Section 4 of the JACOBS report for more information on the science that underpins the identification of the SPG area.
- 4.17** The SPG area (Appendix 1) encompasses approximately 5600ha of land within which developer contributions are being secured to deliver the objectives of this SPG and thus contribute to sustaining the long term future of the marsh fritillary butterfly and, therefore, the Caeau Mynydd Mawr SAC. It should be noted that the area includes some sizable development allocations (including housing, employment and development brief/mixed use)
- 4.18** Whilst not all of this area will attract development proposals or indeed be suitable as management land, the extent of the area is important as it provides a measure of flexibility (in terms of the amount and diversity of potential habitat available). It also assists in keeping land values for potential habitat management sites at a reasonable

rate whilst maintaining higher values on development allocations thus aiding their viability.

- 4.19** Developers should note that the committing of contributions is not time bound and (except for certain exceptions) they are likely to be committed on delivering off site rather than on site management options/mitigation. Contributions go towards funding the implementation of specific management options within the defined geographic area set out within the SPG area. The SPG area clarifies the spatial relationship and land use planning relevance that exists between development and ecological management within this SPG. Applicants can determine with certainty that if their site is located within the SPT area, and falls into the levy schedule, then the Council will seek a contribution. The certainty provided by this SPG also confirms that contributions will be committed to management schemes within that same area.

Deliverability

- 4.20** The Council recognises that the provisions of this SPG represent a long term commitment which will be subject to ongoing monitoring and review.
- 4.21** This guidance supplements the adopted LDP (notably policies GP3 and EQ7) in order to provide a framework for developers and the Council to agree the necessary contributions required within an open and transparent manner. The SPG also prioritises the provisions of this SPG and its requirements in relation to contributions when negotiating other contributions within the SPG area. This ensures compliance with the requirements placed upon the Council under the Conservation of Habitats and Species Regulations 2010 and the associated LDP policies. In applying the principle of prioritisation and in order to achieve the objectives of the SPG, the Council will (in appropriate instances) negotiate any agreed level of contribution on a case by case basis.
- 4.22** It is unlikely that conditions will suffice in most instances as they are unlikely to satisfy the provisions of the Habitat Regulations (including 'in combination' matters) however their use will always be explored in the first instance (PPW 3.7.10) and they may prove useful for any 'on site' conservation/mitigation measures. The Council and developers will agree on the potential value of any 'on site' mitigation as part of negotiating contributions. The levy schedule in Section 5 does allow for offsetting (or part offsetting) of contributions in lieu of on-site mitigation which can be conditioned within a planning permission.
- 4.23** Constructive negotiation in terms of developer contributions will need to be undertaken by all parties. Such negotiations should be informed by the provisions of this SPG. Reference should be given to Section 5 where the levy schedule is set out and a flow chart provided.
- 4.24** Adequate long term resourcing of the SPG is critical. This reflects the fact that mitigation needs to be in place before development commences and because there will be ongoing revenue costs associated with the delivery of the SPG from its adoption to the end of the LDP eg salaries or managing land. Such considerations have informed the developer contribution tariff and associated supporting evidence.
- 4.25** Whilst the SPG needs to be suitably resourced, it is accepted that in some instances (e.g. larger developments) developers are unlikely to be able to provide the total sums of agreed contributions to the Council upon commencement. Financial modelling by virtue of a cash flow analysis will form an important part of the Council's management of the SPG. This analysis will inform any negotiations with regards to

the phasing of contributions, as will the overall monitoring framework in terms of the progress being made in increasing the suitable habitat within the SPG area.

- 4.26** The Council recognises that the majority of resources must be committed towards delivering land management so as to increase the habitat in good condition. The focus is therefore on agreeing reasonable sums in terms of land acquisition/management agreements and avoiding ransom issues. In this regard, this SPG manages hope/premium value aspirations on potential management land to be acquired by promoting flexibility. This flexibility is built into the SPG so that it is not unduly restricted by land purchase/acquirement in order to deliver management. An allowance has been made for funds to be allocated to securing long term lease and management agreements alongside land purchase to provide this flexibility and as shown in para 4.18 the sheer size of the SPG area will mediate hope value for potential management land. Further comfort in deliverability terms is provided by the fact that funds have already been secured from prior planning applications granted permission (see para 4.5) and as such the project officer post funding is in place.
- 4.27** The delivery of this SPG is fundamentally important for planning and conservation reasons. The levy schedule (Section 5) confirms the instances where the Council will seek a contribution as part of the granting of planning permission.

5.0 DEVELOPER CONTRIBUTION

- 5.1 Given that the policy and practical cases for seeking contributions are firmly established, this section provides guidance on the level of contributions that will be sought by the Council and confirms the various classifications of development that are privy to the provisions of the SPG levy.
- 5.2 The levy schedule is developed from, and supported by, the Payment Justification Paper developed by the Council in partnership with Natural Resources Wales (NRW). This paper sets out a land management cost for typical hectare where planning permission is granted. This evidence is based upon land valuations within the SPG area with independent advice provided by chartered surveyors.
- 5.3 **Figure 1 overleaf** confirms the amount of developer contributions that the Council will seek to secure. The schedule also confirms the specific classifications of development that will be subject to the provisions of the levy. A flow chart has been developed to provide added clarity for all parties.
- 5.4 **Where established through negotiation and the production of evidence to the satisfaction of the Council**, consideration will be given to the phasing of contributions. Such phasing (including timing of contributions) will be set out within the legal agreements and will be negotiated by the Council on a case by case basis.
- 5.5 Suitable evidence in terms of 'in kind' contributions (eg land/retention of connectivity corridors) will also need to be confirmed to the satisfaction of the Council if these are to be used to offset/part offset the financial sums owed.
- 5.6 The Council's requirements in relation to developer contributions are underpinned by evidence in terms of operating principles and payment calculations resulting in a concluding total cost per hectare of delivering the required mitigation. Reference should be made to the Payment Justification Paper (see para 5.2 above).
- 5.7 The below classifications of development are subject to the provisions of the levy set out in future 1 overleaf and are thus 'chargeable':-
- **Housing**
 - **Commercial/ Retail**
 - **Employment**
 - **Education/Community**
 - **Transport/highways infrastructure**

The above list is not exhaustive and does not preclude the Council seeking contributions from other development proposals within the SPG area

- 5.8 The provisions of this SPG does not preclude the Council from undertaking TLSE or AA with regards to planning applications within the SPG area as and where it considers them appropriate.
- 5.9 The SPG contribution set out in the legal agreement will not include any legal fees owed to the Council or incurred by the applicant. In terms of what to submit and when, it is advisable that applicants liaise with the Council in advance of submitting a planning application. In order to validate the application and underpin the legal agreement, the Council will require the necessary legal documentation to be made available at submission (eg proof of title). A range of useful contacts is set out in Appendix 3 – including the Council's Legal Department. A template/exemplar legal

agreement is available for viewing and reference should also be made to the LDP Developer Contributions SPG.

Figure 1 – Flowchart for Levy Schedule

- 1 Is the development proposal situated within the SPG area set out in Appendix 1 of this SPG ? Y/N

If N then the development is not subject to the provisions of this SPG. If Y then please proceed to stage 2 below.
- 2 Does the development fall into any of the below classifications ? Y/N.

If N then the development is not subject to the provisions of this SPG. If Y then the development is chargeable at the stated rate.
 - **Housing:** £1,043 per dwelling.
 - **Commercial/Retail:** Site area pro rata with equivalent of 30 dwellings per hectare – i.e £31,290 per ha.
 - **Employment:** Site area pro rata with equivalent of 30 dwellings per hectare – i.e £31,290 per ha.
 - **Education/Community:** Site area pro rata with equivalent of 30 dwellings per hectare – i.e £31,290 per ha.
 - **Transport/highways infrastructure:** Site area pro rata with equivalent of 30 dwellings per hectare – i.e £31,290 per ha.

The above list is not exhaustive and does not preclude the Council seeking contributions from other development proposals within the SPG area
- 3 In the instance of housing development, calculate a residual figure for the number of 'chargeable' dwellings proposed as agreed with the Council.
4. In the instance of 'other' development, calculate a residual figure for the amount of 'chargeable' land take/site area proposed as agreed with the Council.
5. In the instance where an in kind/site specific mitigation scheme has been agreed with the Council, quantify (in monetary terms) the amount of financial contribution that will be offset from that owing to the Council as a result. **Subtract this sum to form a residual overall chargeable total at this point*.*
- 6 What is the total amount of 'chargeable' development?
 - Housing (number of chargeable units x 1,043) = £
 - Other (chargeable site area pro rata where 1ha is £31,290) = £
7. Total financial contribution required (i.e. the sum owed to the Council and to be included within the legal agreement). £

The contribution sum identified in 7 above does not include any legal fees owed to the Council or incurred by the applicant

6.0 MONITORING AND MANAGEMENT

Measuring success

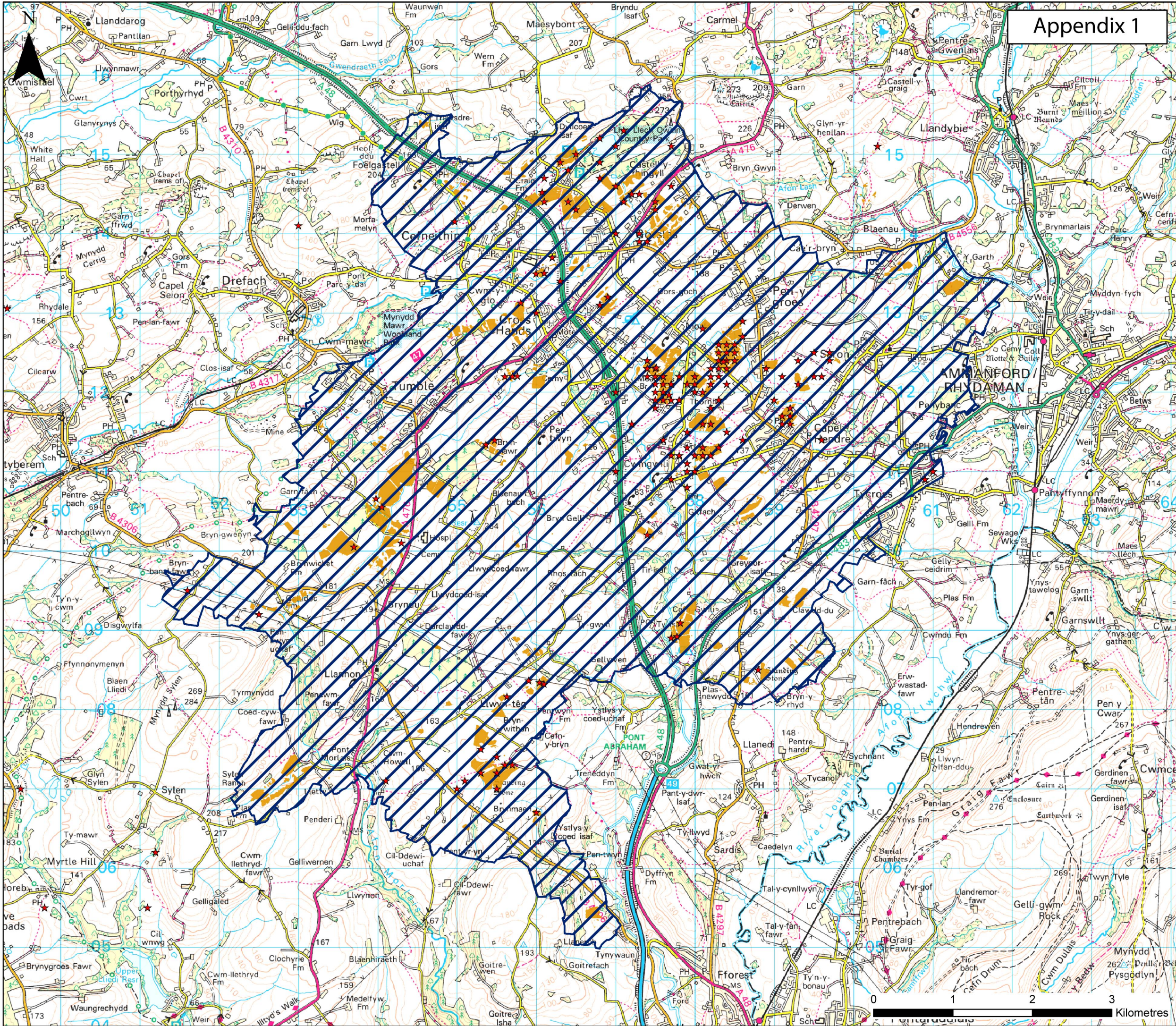
- 6.1** The monitoring and review of this SPG is essential for ensuring ongoing compliance with the Conservation of Habitats and Species Regulations 2010 (as amended) as well as the requirements set out in PPW and Circular 13/97 in relation to the tests for the use of planning obligations.
- 6.2** Detailed evidence on monitoring the success of habitat management, including a methodology for quantifying success, has been developed by the Council. Ongoing liaison is being undertaken with NRW as part of a collaborative approach towards developing monitoring and management best practice.
- 6.3** As the competent Authority, the Council gives a commitment to monitor. This allows for an evaluation of the success of the SPG in terms of the amount of land brought into appropriate management and will also allow for input from a planning point of view in terms of implementation, practicalities and feedback from developers (particularly in terms of the levy and the SPG area). This will also include an update of key evidence that underpins the SPG and its charge tariff (including a review of management/land costs and a refresh of the payment justification paper). A full review will be undertaken in accordance with the monitoring framework of the LDP.
- 6.4** Progress reports will also be considered by the Steering Group (see below).

Management

- 6.5** The Council commits to monitor and account for the receipt and allocation of developer contributions into dedicated SPG financial ledgers.
- 6.6** The setting up of the Caeau Mynydd Mawr SAC partnership and the employment of a project officer is key to successful the delivery of the SPG. The officer is funded by developer contributions secured via the SPG.
- 6.7** The work of the project officer is steered by the Steering Group and associated partnerships.
- 6.8** This SPG sets out the Council's acknowledgement of the importance of developing partnerships. Consideration will be given to third and private sector involvement as well as the considerable potential that this project presents in terms of education and awareness raising of nature conservation issues. It is considered that the project has the potential to act as a pilot for habitat management techniques and best practice.
- 6.9** The management and monitoring for the land acquired and managed under the SPG will be carried out by the constituted Steering Group.

Further information

- 6.10** For further information please contact the Forward Planning Section, Planning Division, Carmarthenshire County Council, 7/8 Spilman Street, Carmarthen, SA31 1JY. forward.planning@carmarthenshire.gov.uk. 01267 228818.
- 6.11** Reference should also be made to Appendix 3 – useful contacts.



Appendix 1



- Legend**
- SPG Boundary**
Final refined area
 - 2010 Carmarthenshire CC Habitat Mapping**
Suitable Habitat (GC, SS,SU,SO,PR)
 - Marsh Fritillary records 1990 - current

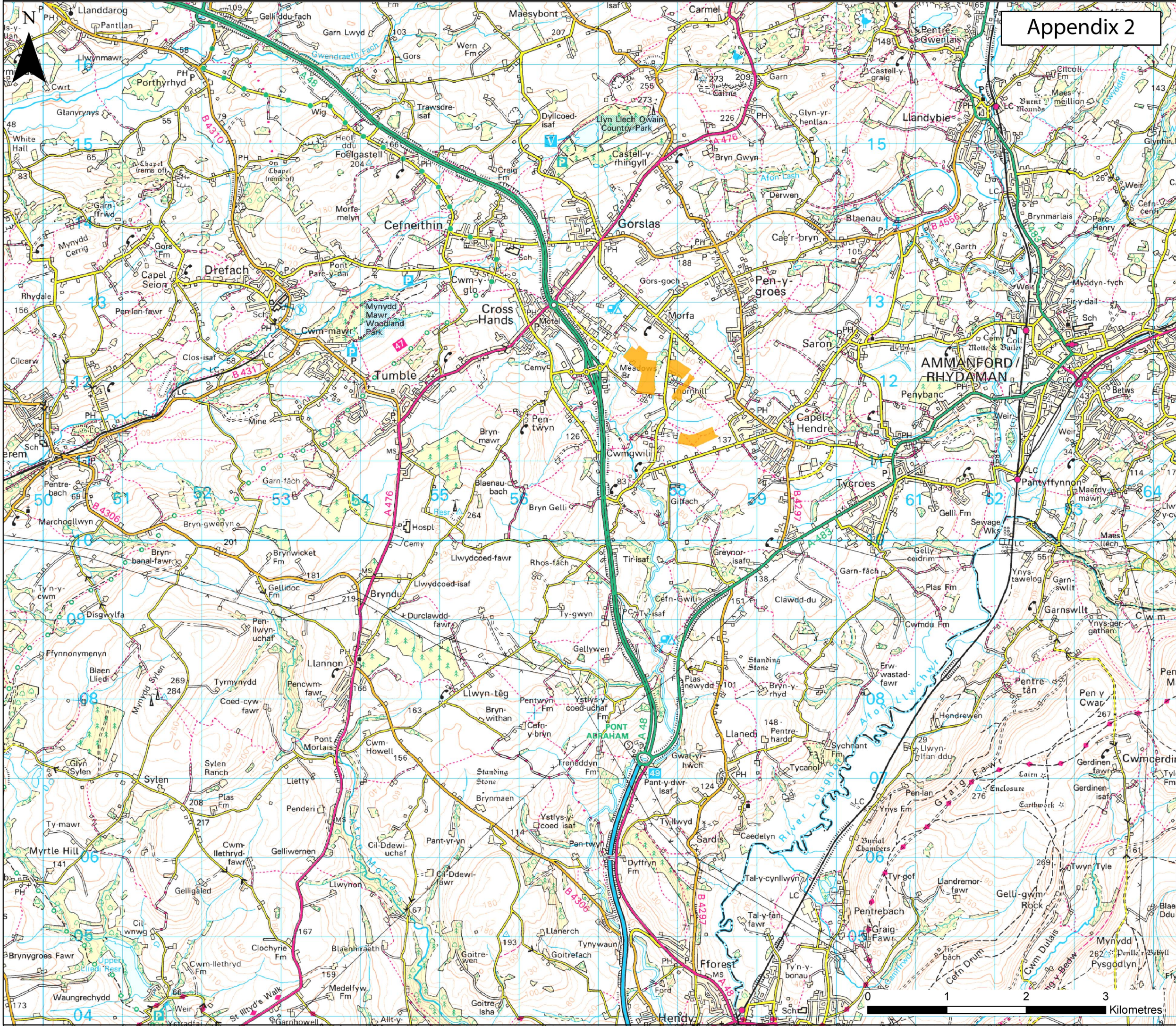
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C	10.12.12	Final	IP	WB	WB	HMW
B	28.09.12	Final Draft	IP	WB	WB	HMW
A	10.08.12	Draft	IP	IP	WB	WB
Rev.	Rev. Date	Purpose of revision	Drawn	Checked	Reviewed	Approved

This drawing is not to be used in whole or part other than for the intended purpose and project as defined on this drawing. Refer to the contract for full terms and conditions.



Caeau Mynydd Mawr SAC Supplementary Planning Guidance		
Drawing Title	Illustration of the overlap of the SPG area marsh fritillary records and areas of suitable marsh fritillary habitat	
Drawing Status	Final	
Scale	1:45,000 @ A3	DO NOT SCALE
Drawing No.	Figure 10	C



Appendix 2



Legend

Special Area of Conservation

- Caeau Mynydd Mawr SAC

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Rev.	Rev. Date	Purpose of revision	Drawn	Checked	Reviewed	Approved
C	10.12.12	Final	IP	WB	WB	HMW
B	28.09.12	Final Draft	IP	WB	WB	HMW
A	10.08.12	Draft	IP	IP	WB	WB

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Caeau Mynydd Mawr SAC
Supplementary Planning Guidance

Drawing Title
Location of the Caeau Mynydd Mawr SAC

Drawing Status
Final

Scale
1:45,000 @ A3 DO NOT SCALE

Drawing No.
Figure 1 C

JACOBS
Churchill House, Churchill Way, Cardiff, CF10 2HH
Tel: +44(0)29 2035 3200 Fax: +44(0)29 2035 3222

APPENDIX 3 – USEFUL CONTACTS

CCC Forward Planning Section, Planning Division, Carmarthenshire County Council, 7/8 Spilman Street, Carmarthen, SA31 1JY.
forward.planning@carmarthenshire.gov.uk. 01267 228818.

CCC Development Management (South) Section: Planning Services
Ty Elwyn, Llanelli, Carmarthenshire, SA15 3AP.
planning@carmarthenshire.gov.uk 01554 742172

CCC Development Management (east) Section: Planning Services
Civic Offices, Crescent Road, Llandeilo, SA19 6HW.
planning@carmarthenshire.gov.uk 01558 825396

CCC Legal Services. County Hall, Carmarthen, SA31 1JP.
CELegalServices@carmarthenshire.gov.uk 01267 224024

The Carmarthenshire County Council Website has a full range of contacts and sets out the supporting evidence for this SPG.