

**Cynllun Datblygu Lleol Diwygiedig Sir Gaerfyrddin 2018 - 2033**  
Carmarthenshire Revised Local Development Plan 2018 - 2033

**Ffurflen Sylwadau 2il Cynllun Datblygu Lleol Diwygiedig Adneuo**  
2nd Deposit Revised LDP Representation Form

*Hoffem gael eich barn am yr 2il Cynllun Datblygu Lleol Diwygiedig Adneuo (Cynllun Datblygu Lleol) ac ar ddogfennau sy'n cefnogi'r Cynllun Datblygu Lleol.*

*Dylid defnyddio'r ffurflen hon ar gyfer pob sylw (h.y. sylwadau neu wrthwynebiadau) Mae fersiynau nodiadau cyfarwyddyd ar gael o [www.sirgar.llyw.cymru](http://www.sirgar.llyw.cymru). Os ydych yn cyflwyno copi papur, atodwch dudalennau ychwanegol lle bod angen.*

*Bydd angen i unrhyw sylwadau a wnaed i'r CDLI Adneuo 1af gael eu hailgyflwyno fel rhan o'r ymgynghoriad ar yr 2il Adnau CDLI. Dim ond sylwadau a wnaed yn briodol i'r 2il CDLI Diwygiedig Adneuo fydd yn cael eu cyflwyno yn yr Arholiad. Ni fydd sylwadau a wnaed i'r CDLI Adneuo 1af bellach yn cael eu hystyried ac **ni fydd** yn rhan o'r Arholiad.*

*Mae gan y ffurflen hon ddwy ran: Rhan A (Manylion personol) a Rhan B (eich sylw). Sylwer y bydd Rhan B ar gael i'r cyhoedd a chaiff ei hanfon at Yr Arolygiaeth Gynllunio.*

**Mae'n rhaid derbyn eich sylwadau erbyn 4:30pm ar y 14 o Ebrill 2023.**

*Dychwelwch ffurflenni at:*

*Rheolwr Blaen-gynllunio, Lle a Chynaliadwyedd, Adran Lle a Seilwaith, 3 Heol Spilman, Caerfyrddin, SA31 1LE*

We would like your views on the Revised Carmarthenshire Local Development Plan (LDP) 2nd Deposit, and also on documents which support the LDP.

This form should be used for all representations (i.e. comments or objections). Electronic versions and guidance notes are available at [www.carmarthenshire.gov.wales](http://www.carmarthenshire.gov.wales). If you are submitting a paper copy, attach additional sheets as necessary.

Any representations made to the 1<sup>st</sup> Deposit LDP will need to be resubmitted as part of the consultation on the 2<sup>nd</sup> Deposit LDP. Only duly made representations to the 2<sup>nd</sup> Deposit Revised LDP will be submitted for examination. Representations made to the 1<sup>st</sup> Deposit LDP will no longer be considered and will **not** form part of the Examination.

This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that Part B will be made publicly available and will be forwarded to the Planning Inspectorate.

**Your representations must be received by 4:30pm on the 14th April 2023.**

Please return forms to:

Forward Planning Manager, Place and Sustainability, Department of Sustainability and Infrastructure, 3 Spilman Street, Carmarthen, SA31 1LE.

**RHAN A: Manylion cysylltu****PART A: Contact details**

<b>Eich manylion/manylion eich cleient</b> <b>Your details / your client's details</b>		<b>Manylion yr asiant (os ydynt yn berthnasol)</b> <b>Agent's details (if relevant)</b>
<i>Enw</i> Name	Mr T. Pearce Mr R. Pearce	Emma Fortune
<i>Teitl swydd (lle y bo'n berthnasol)</i> Job title (where relevant)		Director
<i>Sefydliad (lle y bo'n berthnasol)</i> Organisation (where relevant)		CarneySweeney
<i>Cyfeiriad</i> Address		Brunel House, 2 Fitzalan Road, Cardiff, CF24 0EB
<i>Rhif ffôn</i> Telephone no		[REDACTED]
E-bost Email address		[REDACTED]
<i>Llofnodwyd</i> Signed	[REDACTED]	
<i>Dyddiad</i> Date	28.03.23	

**RHAN B: Eich sylw****PART B: Your representation**

<i>Eich enw / sefydliad</i> Your name / organisation	Emma Fortune / CarneySweeney	
<b>1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau?</b> <b>1. Which part(s) of the Plan (or supporting documents) are you commenting on?</b>		
<i>Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle</i>	Policy SP1 Policy SP3	

LDP policy or site allocation number(s)	Policy SD1 Policy HOM1 (Site Allocation SuV61/h1) Policy HOM2 Policy AHOM1 Policy SP16
<i>Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran</i> LDP paragraph or section number(s)	
<i>Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol</i> LDP Proposals Map reference(s)	
<i>Os yw eich sylw yn perthyn i ddogfen ategol (e.e. y Gwerthusiad o Gynaliadwyedd), rhowch yr enw(au) a'r cyfeiriad(au) i mewn yma.</i> If your representation relates to a supporting document' including the: Sustainability Appraisal), and/or Habitat Regulations Assessment insert the name of the document and section reference(s) and/or paragraph number here.	
<p><b>2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod p'un a gredwch fod y Cynllun yn gadarn ai peidio, ac a yw'n bodloni'r gofynion gweithdrefnol.</b></p> <p><i>I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.</i></p> <p><b>2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.</b></p> <p><i>For more information on soundness and procedural requirements, see the guidance notes.</i></p>	
<i>Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol.</i> I think the LDP is sound and meets procedural requirements.	X
<i>Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid.</i> I think the LDP is unsound and should be changed.	
<i>Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.</i>	

I think that the procedural requirements have not been met.		
<p><b>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff newydd?</b></p> <p><i>Ticiwch bob un sy'n berthnasol.</i></p> <p><b>3. Would you like the LDP to include a <u>new</u> policy, site allocation or paragraph?</b></p> <p>Tick <u>all</u> that apply.</p>		
Dyraniad safle newydd New site allocation		X
Polisi newydd New policy		
Paragraff neu destun ategol newydd New paragraph or supporting text		
<p><b>4. Os ydych am ychwanegu dyraniad safle newydd, a wnaethoch gyflwyno'r safle yn flaenorol fel safle cais? Os felly, a fydddech cystal â rhoi enw a chyfeiriad y safle cais (os yw'n hysbys).</b></p> <p><b>4. If you want to add a new site allocation, have you previously submitted the site as a Candidate Site? If so, please give the Candidate Site name and reference (if known).</b></p>		
Enw'r safle Site name	Land adjacent to Crofters Rest, Pendine	
Cyfeiriad y cais Site reference	SR/126/001	
<p><i>Os ydych am awgrymu safle newydd, dylech atodi cynllun o'r safle yn nodi ffiniau'r safle rydych am eu cynnwys yn y Cynllun a rhoi manylion am ei ddefnydd arfaethedig. Dylech ystyried a oes angen i'r ffurflen sylwadau hon gael ei hategu gan arfarniad o gynaliadwyedd. Lle bo gan newidiadau arfaethedig i Gynllun Datblygu effeithiau cynaliadwyedd sylweddol, bydd angen i chi ddarparu'r wybodaeth berthnasol ar gyfer arfarnu cynaliadwyedd. Mae'n rhaid i'r wybodaeth hon fod yn gyson â chwmpas a lefel manylder yr arfarniad o gynaliadwyedd a gynhaliwyd gan yr Awdurdod. Dylai hefyd gyfeirio at yr un wybodaeth waelodlin wrth amlygu effeithiau sylweddol tebygol y polisi arfaethedig neu safle newydd.</i></p> <p>If you want to suggest a new site, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. You should consider whether it is necessary for this comments form to be accompanied by a sustainability appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be</p>		

consistent with the scope and level of detail of the sustainability appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

### **5. Rhestrwch eich sylwadau isod.**

*Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sydd eu hangen i gefnogi/cyfiawnhau eich sylw. Nodwch pa brawf/proffion cadernid mae'r Cynllun Datblygu Lleol yn eu bodloni neu nad yw'n eu bodloni a pham (gweler y nodiadau cyfarwyddyd i gael rhagor o wybodaeth). Bydd hyn yn helpu'r Awdurdod a'r Arolygydd i ddeall y materion y byddwch yn eu codi. Dim ond os bydd yr Arolygydd yn eich gwahodd i fynd i'r afael â materion y bydd yn eu codi y byddwch yn gallu cyflwyno rhagor o wybodaeth i'r archwiliad. Sylwer na fydd yr Arolygydd wedi gallu gweld unrhyw sylwadau y gallech fod wedi'u gwneud mewn ymateb i ymgynghoriadau blaenorol.*

### **5. Please set out your comments below.**

Include all the information, evidence and supporting information necessary to support / justify your representation. Please indicate which soundness test(s) the LDP meets or does not meet, and why (see guidance notes for more information). This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

### **Policy SP1: Strategic Growth**

We support Policy SP1 which includes provision for 9,704 new homes to meet the identified housing requirement of 8,822 and consider this to be an achievable level of growth for the County.

We would reiterate the importance of enabling appropriate levels of growth in smaller sustainable villages, such as Pendine, in addition to larger key settlements, to ensure these housing targets for the Plan period can be achieved.

### **Policy SP3: Sustainable Distribution – Settlement Framework**

The categorisation of Pendine as a 'Tier 3 Sustainable Village' within the Settlement Framework is supported. We agree that locations in this tier are suitable for housing allocations, as per paragraph 11.74 of the Written Statement.

In terms of the distribution of growth in Carmarthenshire, we support the notion at paragraph 11.72, which recognises that much of the County is rural and housing is needed in these locations, not just in the larger top tier settlements. Accordingly, the Plan should enable and encourage incremental growth of smaller sustainable villages, such as Pendine, to support their local population and economy.

Increased housing supply should be supported in locations where people already live, to ensure that local people have the opportunity to buy homes and continue to live in these areas, rather than needing to move elsewhere within or outside the

County. This will be crucial to address one of Carmarthenshire's key issues: ageing population and out-migration of younger and working age people.

### **Policy SD1: Development Limits**

We wholly support the alterations proposed to the development limit boundary of Pendine, which now includes Curtilage of Nieuport Farmhouse (Candidate Site Ref: SR/126/004); the western part of Land adjacent to Crofters Rest (Candidate Site Ref: SR/126/001); and a small area of Land rear of St Margarets Park (Candidate Site Ref: SR/126/002), to form a slightly larger housing allocation at Nieuport Yard (ref: SuV61/h1).

The inclusion of these sites ensures that the organic growth of Pendine can be supported through deliverable, viable and policy-compliant housing schemes, which will contribute towards meeting the RLDP's objectives. The above sites (as well as additional adjacent land) lie within the ownership of the site promoter, Mr T. Pearce, and represent logical extensions to the existing built form of Pendine. We therefore support that these sites present valuable opportunities for a suitable level of growth within this 'sustainable village' (Tier 3 as per Policy SP3).

Notwithstanding the above, we propose that the development limit should be extended further to also include the remaining part of Land adjacent to Crofters Rest, to encompass the full site as per the candidate site submission originally submitted in 2018 (ref: SR/126/001).

Inclusion of the full extent of the Land adjacent to Crofters Rest presents an opportunity to provide a modest amount of additional housing. The site is also entirely within the site promoter's ownership, thereby eliminating any land ownership constraints to delivery.

The total site is a rectangular parcel of land comprising approximately 0.5ha, which is currently arable/general agricultural land.

The site is relatively free from physical constraints, with a flat topography. There is an existing hedgerow bounding the site to the north, separating the site from the B4314 road. Other than this hedgerow, the site is free from other landscape constraints. The site is not subject to any statutory nature conservation or archaeological designations, nor tree preservation orders. The site does not lie within a defined flood plain (TAN 15 Development Advice Maps).

We note that the site is located within a Special Landscape Area, however so is the majority of the built settlement of Pendine. Considering this, together with the partial inclusion of the site within the amended development limits, the landscape designation is not considered to unacceptably constrain the future development of the whole site at Crofters Rest.

As demonstrated for the western part of the site (now proposed to be included within the settlement) the access track off B4314 can suitably be extended eastwards to accommodate further housing. Inclusion of this land would represent a logical extension to Pendine that would provide symmetry with the existing housing located immediately north of B4314 (detached bungalows) yet would not extend the built settlement any further eastwards than the existing situation to the north.

The site lies in close proximity to existing residential development in Pendine and is therefore assumed to be capable of providing appropriate services and utilities connections.

In our view, the extension of the development limit to include the remaining land adjacent to Crofters Rest within the forthcoming LDP, represents a viable and deliverable opportunity to provide an appropriate range and choice of housing to meet small scale additional growth within Pendine. The allocation of the full extent of the site would also provide additional flexibility as to the size and range of units that could be offered on site, to meet local demand in a sustainable manner.

### **Policy HOM1: Housing Allocations**

In particular, we support the allocation of site ref: SuV61/h1 - Land at Nieuport Yard, for the delivery of 10 units. Part of the site already benefits from an implemented planning permission for 5 units (planning permission ref: 2/21251).

### **Policy HOM2: Housing within Development Limits**

We support Policy HOM2, which notes that whilst sites capable of delivering 5 or more dwellings are allocated for housing, there are smaller unallocated sites within the settlement limits throughout the County which may be available for the delivery of small scale housing development. We support that proposals on such sites should be permitted provided they accord with the relevant RLDP policies.

### **Policy AHOM1: Provision of Affordable Homes**

We support the RLDP objectives for delivery of affordable housing in meeting the needs of Carmarthenshire. We note that on-site AH contributions will be sought on developments of 10 or more dwellings, based on a percentage that rises incrementally depending on the total number of dwellings proposed. Policy AHOM1 states that: "*The affordable housing target percentage noted is a target to be used as a starting point for affordable housing negotiations.*" We would agree that among other considerations, viability should be taken into account when negotiating the amount of affordable housing contribution that should be sought for any given scheme, to ensure the deliverability of market housing schemes.

Policy AHOM1 also notes that: "*Where adjacent and related residential proposals result in combined numbers meeting or exceeding the above thresholds, the council will seek an element of affordable housing based on applying the above target percentages to the aggregate number of dwellings.*" Again, we would reiterate that this policy should be applied with careful consideration of the overall viability of housing developments between the LPA and developers.

### **Policy SP16: Climate Change**

We support this policy and recognise the importance of the Council's wider goals to address climate change, including reducing greenhouse gas emissions. However we would suggest that, in terms of Policy SP16, the design requirements

for small-scale housing developments should be no more onerous than the relevant Building Regulations requirements, in order to ensure that proposals remain deliverable and viable to meet the identified housing need over the Plan period.

*Ticiwch yma os ydych chi'n cyflwyno deunydd ychwanegol i gefnogi eich sylw.*

Tick here if you are submitting additional material to support your representation.

**6. Os ydych yn gwrthwynebu'r Cynllun Datblygu Lleol, ydych am siarad mewn sesiwn gwrandawriad yr Archwiliad cyhoeddus?**

*Ar y cam hwn, gallwch wneud sylwadau'n ysgrifenedig yn unig (gelwir y rhain yn 'sylwadau ysgrifenedig'). Fodd bynnag, gall pawb sydd am newid y Cynllun ymddangos gerbron yr Arolygydd a siarad mewn 'sesiwn gwrandawriad' yn ystod yr Archwiliad cyhoeddus. Ond dylech gofio y bydd yr Arolygydd yn rhoi'r un pwys ar eich sylwadau ysgrifenedig ar y ffurflen hon â'r rheiny a wneir ar lafar mewn sesiwn gwrandawriad. Sylwer hefyd y bydd yr Arolygydd yn pennu'r weithdrefn fwyaf priodol ar gyfer darparu ar gyfer y rhain sydd eisiau rhoi tystiolaeth lafar.*

**6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?**

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

*Nid wyf am siarad mewn sesiwn gwrandawriad ac rwyf yn fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygydd.*

I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.

*Rwyf am siarad mewn sesiwn gwrandawriad.*

I want to speak at a public hearing.

X

*Os ydych chi eisiau cyfranogi mewn gwrandawriad, nodwch isod am beth rydych chi eisiau siarad (e.e. 'Safle Tai ym Mhen y Graig' neu 'Y targed tai cyffredinol').*

If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').



We would like to reserve the right to attend a public hearing should any amendments be made to the current proposed allocation of Land at Nieuport Farm, Pendine (ref: SuV61/h1) or to the development limits of Pendine village as currently drafted within the 2nd Deposit Plan.

**7. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed.**

**7. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.**

*Rwy'n dymuno cael fy nghlywed yn Gymraeg.*

I wish to be heard in Welsh.

*Rwy'n dymuno cael fy nghlywed yn Saesneg.*

I wish to be heard in English.

X

## Nodiadau cyfarwyddyd

### Guidance notes

*Caiff Cynllun Datblygu Lleol Sir Gaerfyrddin ei archwilio gan Arolygydd annibynnol a benodir gan Lywodraeth Cymru. Gwaith yr Arolygydd yw ystyried a yw'r Cynllun yn bodloni **gofynion gweithdrefnol** ac a yw'n **gadarn**.*

*'Gellir ystyried 'Cadarn' yn y cyd-destun hwn o fewn ei ystyr arferol o 'dangos barnu da' a 'gellir ymddiried ynddo'. Y cwestiynau neu'r 'profion' y bydd yr Arolygydd yn eu hystyried wrth benderfynu a yw'r Cynllun yn gadarn yw:*

- 1. Ydy'r cynllun yn ffitio? (h.y. a yw'n gyson â chynlluniau eraill?)*
- 2. Ydy'r cynllun yn briodol? (h.y. a yw'n briodol ar gyfer yr ardal yng ngoleuni'r dystiolaeth?)*
- 3. A fydd y cynllun yn cyflawni? h.y. a yw'n debygol o fod yn effeithiol?)*

*Darperir rhagor o wybodaeth am y profion cadernid a gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.*

*Os ydych yn gwrthwynebu, dylech ddweud pam rydych yn credu bod y Cynllun yn ansad a sut y dylid newid y Cynllun er mwyn ei wneud yn gadarn.*

*Lle cynigiwch newid i'r Cynllun, byddai o gymorth esbonio pa brawf/brofion cadernid y credwch y mae'r Cynllun yn eu methu. Os yw eich sylw yn perthyn i'r ffordd gafodd y Cynllun ei baratoi neu'r ffordd yr ymgynghorwyd arno, mae'n debygol y bydd eich sylwadau yn perthyn i 'ofynion gweithdrefnol'.*

*Fydd methu adnabod prawf ddim yn golygu na chaiff eich sylwadau eu*

The Carmarthenshire Revised Local Development Plan (LDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound.

'Sound' may be considered in this context within its ordinary meaning of 'showing good judgement' and 'able to be trusted'. The questions or 'tests' which the Inspector will consider in deciding whether the Plan is sound are:

1. Does the plan fit? (i.e. is it consistent with other plans?)
2. Is the plan appropriate? (i.e. is it appropriate for the area in the light of the evidence?)
3. Will the plan deliver? (i.e. is it likely to be effective?)

More information on the soundness tests and procedural requirements is provided in the Planning Inspectorate's LDP Examinations Procedural Guidance.

If you are making an objection, you should say why you think the Plan is unsound and how the Plan should be changed to make it sound.

Where you propose a change to the Plan it would be helpful to make clear which test(s) of soundness you believe the Plan fails. If your comment relates to the way in which the Plan has been prepared or consulted on, it is likely that your comments will relate to 'procedural requirements'.

Failing to identify a test will not mean that your comments will not be considered, providing it relates to the

*hystyried, cyhyd â'i fod yn perthyn i'r Newidiadau Canolbwyntiedig. Dylech gynnwys eich holl sylwadau ar y ffurflen, gan ddefnyddio dogfennau ychwanegol a thystiolaeth ategol lle bod angen.*

*Os ydych yn ceisio am fwy nag un newid i'r Cynllun, nid yw bob tro yn angenrheidiol i lenwi ffurflenni ar wahân ar gyfer pob darn o'ch sylw. Fodd bynnag, gallai fod yn ddefnyddiol o bosibl i ddefnyddio dwy ffurflen ar wahân os ydych yn dymuno siarad mewn gwrandawriad am rai gwrthwynebiadau ond nid rhai eraill.*

*Pan fydd grŵp yn rhannu barn gyffredin ar sut mae'n dymuno i'r Cynllun gael ei newid, byddai'n ddefnyddiol i'r grŵp hwnnw anfon ffurflen unigol gyda'u sylwadau, yn hytrach na bod nifer fawr o unigolion yn anfon ffurflenni ar wahân yn ailadrodd yr un pwynt. Mewn achosion o'r fath, dylai'r grŵp nodi faint o bobl mae'n eu cynrychioli a sut gafodd y sylw ei awdurdodi. Dylid nodi cynrychiolydd y grŵp (neu'r prif ddeisebydd) yn glir.*

Plan or its supporting documents. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.

If you seek more than one change to the Plan, it is not always necessary to complete separate forms for each part of your representation. It may, however, be helpful to use two separate forms if you wish to speak at a hearing about some objections but not others.

Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified.