

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

27th February 2023

Dear Sir,

**Carmarthenshire Local Development Plan 2018 -2033**

**Public Consultation on Deposit Draft**

**Candidate Site SR/157/004 - Land at Cae Ffair, Culla Road, Trimsaran**

I am pleased to respond to the public consultation on the Deposit Draft (2nd edition) of the new Carmarthenshire Local Development Plan 2018 - 2033, specifically with respect to Candidate Site SR/157/004, Land at Cae Ffair, Culla Road, Trimsaran.

This representation reaffirms the submission I made to the consultation on candidate sites by virtue of my letter dated 6th February 2019. I note that all previous representations of the proposed LDP fall at this time and I, therefore, submit my views once more for consideration in the plan adoption process.

I am please to note from the latest information published by the County Council that the development limits for the settlement of Trimsaran will be expanded to include part of the site at Culla Road for development. I fully **SUPPORT** the extension of the development limit in this location but submit that the Planning Authority is missing an opportunity to optimise the potential of the area by limiting development to a ribbon arrangement along the road frontage.

I submit that an in-depth development of the larger site will be more conducive to the sustainable development of the settlement for the following reasons.

**Accessibility**

The land is situated immediately adjacent to the B4317 classified highway with easy access directly off the highway with good visibility in both directions. The B4317 is categorised as part of the primary road network. The site is also located close (approximately 200 metres) to the junction of the B4317 with the B4308 classified highway in the centre of the village and is, consequently well served by the local highway network. The B4308 is categorised as part of the core road network. Although situated at the end of the present development limit on Culla Road the land is located close to the village centre

and within easy walking distance of local facilities, including the primary school, pharmacy, convenience shops and public houses.

### **Local Amenity**

The development of the larger area of land for residential purposes will remove an area of dereliction adjacent to and opposite existing residential properties. It will lead to a general upgrading of the quality of the local environment at a key gateway to the settlement and enhance the perspective of the built environment by introducing balanced development at the gateway.

### **Brownfield Land**

Development of the larger area of land will bring land previously used for heavy industry, currently lying dormant and unsightly, back into productive use, reducing development pressure on green field sites. Restricting development to the road frontage could risk sterilising a larger area of land post-industrial land to the detriment of the future potential of the settlement.

### **Road Safety**

The entrance to the land is situated within the existing 30 mph speed restricted zone at the entrance to the settlement at Culla Road and within a length of the highway already served by street lighting.

### **Public Transport**

The site is situated close to existing public bus service route 197.

### **Summary**

I submit that the larger area of land is ideally suited to an in-depth development as opposed to a roadside only ribbon development. I believe that approximately 1.7 hectares is available for a sensitively designed development that could accommodate around 16 dwellings, subject to detailed and sensitive design. An in-depth development would be more conducive in my view to facilitating a mixed character development incorporating an element of affordable housing.

In fact, the Planning Inspector who conducted the Public Inquiry into the preparation of the Carmarthenshire Unitary Development Plan in 2004, having visited the site as part of his deliberations, recorded in his decision report that in his judgement the site in its current/ then condition ***“appears to have little beneficial use”*** (for recreation) and ***“I consider that there is the opportunity to provide a development in depth which would complement the housing development on the other side of Culla Road and provide the opportunity to improve this gateway to the village.”***

In my view it is regrettable that the County Council did not accept the view of the Planning Inspector at the time and include the site within its development plan, missing a real opportunity to enhance the environment of the village and meet, in part, identified housing need. The preparation of the new Local Development Plan presents a perfect opportunity to correct that shortcoming.

I note that in its published Site Assessment Table accompanying the Deposit Draft LDP the County Council has concluded that *"the appropriate developable element of the site cannot accommodate 5 or more dwellings"*. It is difficult to understand how this conclusion has been arrived at as the site clearly has the potential to accommodate an increased number of dwellings in a manner that will enhance the development and amenity of the area. This was the conclusion of the Planning Inspector in his deliberations in 2004 and surely this is the correct conclusion. I urge the County Council to reconsider its position on this matter and agree to extend the development limit to secure the maximum benefit for the community and local environment.

If the whole of the land is not allocated for development it is likely that part of it will remain in an unsightly condition, adversely affecting the amenity of the area and the enjoyment of local residents.

In my judgement the site performs very favourably in an objective sequential test when compared with other candidate sites.

Yours sincerely

A large black rectangular redaction box covering the signature area.

R. A. Sully





**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****Eich manylion/manylion eich cleient**  
**Your details / your client's details****Manylion yr asiant (os ydynt yn berthnasol)**  
**Agent's details (if relevant)****Enw**  
**Name**

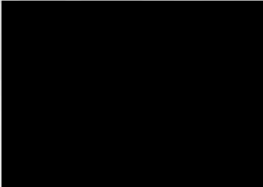
Robert Sully

**Teitl swydd (lle y bo'n berthnasol)**  
**Job title (where relevant)**

N/A

**Sefydliad (lle y bo'n berthnasol)**  
**Organisation (where relevant)**

N/A

**Cyfeiriad**  
**Address****Rhif ffôn**  
**Telephone no****E-bost**  
**Email address****Llofnodwyd**  
**Signed****Dyddiad**  
**Date**

27th February 2023

**RHAN B: Eich sylw****PART B: Your representation****Eich enw / sefydliad**  
**Your name / organisation**

N/A

**1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau?**

**1. Which part(s) of the Plan (or supporting documents) are you commenting on?**

<p><i>Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle</i> LDP policy or site allocation number(s)</p>	<p>Candidate Site SR/157/004 Land at Cae Ffair, Trimsaran</p>
<p><i>Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran</i> LDP paragraph or section number(s)</p>	
<p><i>Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol</i> LDP Proposals Map reference(s)</p>	
<p><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>	

**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.**

*I gael rhagor o wybodaeth am gadarnid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.*

**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.**

*For more information on soundness and procedural requirements, see the guidance notes.*

<p><i>Rwyf o'r fam bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol.</i> I think the LDP is sound and meets procedural requirements.</p>	<p>Yes</p>
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<p><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.</p>	<p>Limited change with respect to specific site.</p>
<p><i>Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.</i> I think that the procedural requirements have not been met.</p>	
<p><b>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff newydd?</b> <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> Tick <u>all</u> that apply.</p>	
<p><i>Dyraniad safle newydd</i> New site allocation</p>	
<p><i>Polisi newydd</i> New policy</p>	
<p><i>Paragraff neu destun ategol newydd</i> New paragraph or supporting text</p>	
<p><b>4. Os ydych am ychwanegu dyraniad safle newydd, a wnaethoch gyflwyno'r safle yn flaenorol fel safle cais? Os felly, a fyddech 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>	
<p><i>Enw'r safle</i> Site name</p>	<p>SR/157/004 Land at Cae Ffair, Trimsaran</p>
<p><i>Cyfeiriad y cais</i> Site reference</p>	



*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.*

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 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 ymiateb 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.

Please see attached letter.

*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.

Yes

*Rwyf am siarad mewn sesiwn gwrandawriad.*

I want to speak at a public hearing.

*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').

**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.

*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 cademid 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/broffion cademid 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 hystyried, cyhyd â'i fod yn perthyn i'r Newidiadau Canolfwyntiedig. Dylech gynnwys eich holl sylwadau ar y ffurflen, gan ddefnyddio doafennau vchwanegol*

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



