

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. Os ydych yn cyflwyno copi papur, atodwch dudalennauychwanegol 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. If you are submitting a paper copy, attach additional sheets as necessary.

Any representations made to the 1st Deposit LDP will need to be resubmitted as part of the consultation on the 2nd Deposit LDP. Only duly made representations to the 2nd Deposit Revised LDP will be submitted for examination. Representations made to the 1st 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.

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	Mrs Jane Driver	
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	[REDACTED]	
Rhif ffôn Telephone no	[REDACTED]	
E-bost Email address	[REDACTED]	
Llofnodwyd Signed	[REDACTED]	
Dyddiad Date	03/04/23	
Eich enw / sefydliad Your name / organisation	Jane Driver	
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?		
Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle	SeC10/h4	

LDP policy or site allocation number(s)	
<i>Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran</i> LDP paragraph or section number(s)	SP 1,2,3,4,6,7,8,9, 11,12,13,14,15,16, 17,18,19
<i>Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol</i> LDP Proposals Map reference(s)	SeC10/h4
<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.</p> <p><i>I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.</i></p> <p>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.</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.	No
<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.	Yes
<i>Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.</i> I think that the procedural requirements have not been met.	Yes
<p>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff newydd? <i>Ticiwch bob un sy'n berthnasol.</i></p> <p>3. Would you like the LDP to include a <u>new</u> policy, site allocation or paragraph?</p>	

Tick <u>all</u> that apply.	
<i>Dyraniad safle newydd</i> New site allocation	local community services to enhance and support residents
<i>Polisi newydd</i> New policy	Reclassify as public or community space
<i>Paragraff neu destun ategol newydd</i> New paragraph or supporting text	See below
<p>4. Os ydych am ychwanegu dyraniad safle newydd, a wnaethoch gyflwyno'r safle yn flaenorol felsafle cais? Os felly, a fydddech cystal â rhoi enw a chyfeiriad y safle cais (os yw'n hysbys).</p> <p>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).</p>	
<i>Enw'r safle</i> Site name	Amman Valley Maternity Hospital
<i>Cyfeiriad y cais</i> Site reference	SeC10/h4
<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 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.</p>	

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/profion 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.

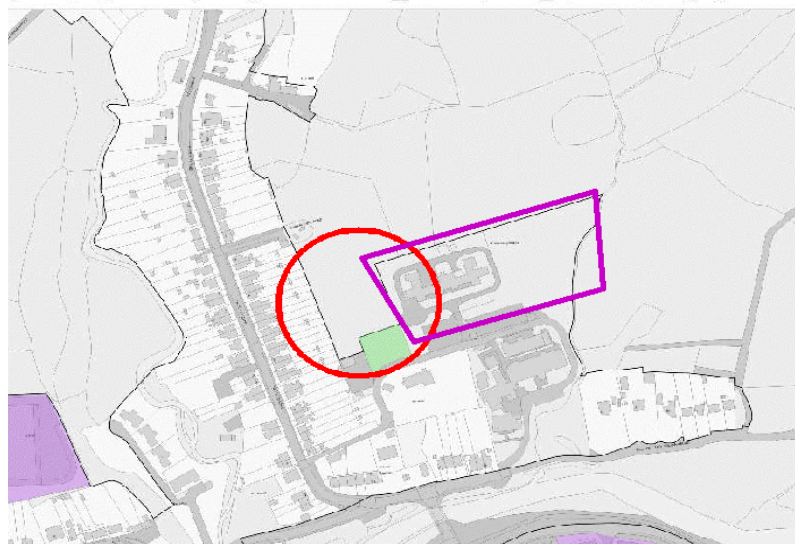
Remove this area from "housing development" because of the difficulty for potential developers to build roads from Tirycoed Road to the old maternity hospital. This is already a busy road with old, weight restricted bridges at either end.

Change the listed ground to the west of the old Maternity Hospital from "housing development" (See red circle on map) because of conservation and access restriction concerns.

This area qualifies for [SINC](#) status given that the rhos pasture and hedges are protected habitats and the **Marsh Fritillary Butterfly** is protected under UK law, listed under Schedule 5 of the Wildlife and Countryside Act, and the EU Habitats and Species Directive (Annex II).



I also object to the remaining development site (See purple box on map below) on conservation grounds and lack of access. These plans have been pushed for a number of years already and have always been refused. **The circumstances have not changed 700** people objected to a housing development on this site under the aegis of both the RLDP and the current PAC (S21.186). (See online petition) <https://www.change.org/p/no-to-the-housing-development-on-tirycoed> and door to door petition <https://thunderbolt.me.uk/Docs/Tirycoed%20Petition%20Redacted.rar>



Furthermore actual size of this site would support a great deal more homes than the 25 currently being proposed in PAC S21.186 . However we also object on the understanding that the current LDP cannot be met on the following grounds:

SP2 Retail and Town Centres

There are no large retail outlets, in Glanamman unless you travel to Ammanford. The Dentist and GP surgery are oversubscribed, there are no leisure facilities nearby and the local infrastructure is not able to cope with an influx of housing on this scale. The main road though Glanamman already struggles to cope with too much traffic causing queues through the village and consequently fumes from a steady flow of traffic passing through where a lot of houses are situated very close to the main road.

SP3 Sustainable Distribution – Settlement Framework

There are very few services available in this location and this development would put huge strain on existing ones. We constantly suffer from disrupted water supplies due to the ageing and an inadequate water supply system, which would be overwhelmed by the additional capacity needed.

SP4 A Sustainable Approach to Providing New Homes

There is not an “appropriate number” of homes being suggested for this site. Although 25 dwellings are currently being requested, it is very clear that the site has capacity for at least 100. That would be a massive burden on the local infrastructure and facilities. The access road is not suitable for such volumes of traffic and there are already huge issues with water supply and drainage which cannot be addressed.

SP9 Infrastructure

Those already living in Tirycoed Rd have already had to pay for the upgrading of their electricity supply due to its lack of capacity and overall the local infrastructure is very poor.

SP12 Placemaking and Sustainable Places

Placemaking should be holistic and inclusive and rightly be at the heart of any planning decision. Furthermore any development should; comply with Welsh Government policy on sustainable places

<https://research.senedd.wales/research-articles/making-sustainable-places-what-role-can-the-planning-system-play/>, and take account of the Well-being of Future Generations (Wales)

Act 2015 and be predicated on

- Making the best use of resources;
- Facilitating accessible and healthy environments;
- Creating and sustaining communities; and
- Maximizing environmental protection and limiting environmental impact.

My concern is that this proposed housing development will fail to meet most of those expectations. There are dangers that this development will destroy established habitat and endangered species, it will cause light pollution and it will adversely affect community cohesion into which it is being placed.

SP13 Rural Development

This proposed site is located in an area of outstanding natural beauty where wildlife currently thrives. Allowing such a large development on such precious land is absolutely against current rural development policy

<https://research.senedd.wales/research-articles/the-rural-development-plan-for-wales/> which is predicated on “*the sustainable management of natural resources and climate action*”

SP14 Maintaining and Enhancing the Natural Environment

Housing development will destroy our *unique and bio diverse landscape and our protected habitats and lead to loss of biodiversity*. This development will lead to the de-wilding of the site and the subsequent loss of the Marsh Fritillary Butterfly, Devils Bit Scabious and winter visitors such as snipe and woodcock.

Devils Bit Scabious- Christian Fischer, CC BY-SA 3.0 <<https://creativecommons.org/licenses/by-sa/3.0/>>, via Wikimedia Commons

Previous planning applications have absolutely failed to address the issue of habitat destruction (Which the developers have been actively engaged in). Endangered species will be displaced and lost and riparian corridors will be blocked preventing otters (which are low in Wales) from travelling.

SP15 Protection and Enhancement of the Built and Historic Environment

The appropriate use of this redundant building is certainly not to allow its demolition and replacement with a totally unsuitable housing development. Absolutely no consideration has been given to the wishes of the local community nor the protection of this historic site.

SP16 Climate Change

There has been no carbon audit of potential housing development on this site. It has been estimated (Drexler et al 2021, NERR094) that the current carbon stocks (rhos pasture, shrubs and hedges) on the site (ca 2ha) are 220 T C which will be cut by 84.75 T C to 135.25 T C after housing development. The carbon emissions (Berners-Lee 2010) as a result of development (25 houses plus roads, paths, drives, parking bays) will be approximately 3000 T CO₂ and there will be a sequestration reduction of 0.125 T C yr (NERR094).

The destruction of Rhos pasture, trees and grassy marshland on this site would be an absolute disaster for the local environment. Paving over huge areas for roads and paths will create **hard standing that will cause rain water to surge onto surrounding roads and properties, causing flooding.** Previous planning applications have had few mitigating measures for renewable energy, carbon negative building materials or energy conservation schemes.

SP19 Waste Management

Safeguarding resources would not be achievable if planning permission were granted for this site. The loss of trees and pasture would contribute to Climate Change while the amount of **carbon** that would be released during the construction phase alone would be damaging to the environment.

Could I request that CCC reclassify the development site as community or public space¹ and refer CCC to your obligations under the aegis of the **placemaking guide** 2020.

(<https://dcfw.org/wp-content/themes/dcfw-child/assets/PlacemakingGuideDigitalENG.pdf>)

The importance of community space was highlighted in a recent supreme court ruling - **Hilary Term (2023) UKSC 8 on appeal from (2020) EWCA civ 1751- (R (on the application of Day) (Appellant) v Shropshire Council (Respondent) (landmarkchambers.co.uk))** where the court ruled in favour of the local community.

Furthermore the importance of having access to community space was a frequent theme highlighted in a consultation report on connected communities

https://www.gov.wales/sites/default/files/consultations/2019-03/summary-of-responses_2.pdf

This site could provide so much benefit if it were used for well-being, conservation and recreation (given the increasing number of people suffering with mental illnesses maybe a well-being centre, a conservation area with pond, and board-walks for recreation and conservation interpretation). *This site is adjacent to the most important breeding ground for the Marsh Fritillary Butterfly in the Amman Valley.* Please note CCC's obligations with regards to **placemaking charter** (<http://dcfw.org/placemaking/placemaking-charter/>) to provide spaces to promote prosperity, health, happiness, and **well-being** in the widest sense.

This would meet the current requirements on the following grounds:

SP1 Strategic Growth

The installation of Health and conservation facilities would be far more beneficial to the community than housing. This site is within easy reach of local Schools, so could be used as an outdoor education centre for children and adults alike.

SP2 Retail and Town Centres

Having a Community lead facility on this site benefits everyone.

SP3 Sustainable Distribution – Settlement Framework

Our suggested project (The Tirycoed Well-being Centre) not only uses the existing building foundation as its base, but will also be managed sustainably, the exact opposite of the current proposals.

SP6 Strategic sites

This project will *invest in the local Community and provide much needed facilities for all*, rather than benefiting already very rich people. This inward development will also create local sustainable jobs, benefit local business and bring a much needed boost to the local economy.

SP7 Employment and the Economy

This project will invest in the local Community and provide much need facilities for all, rather than benefiting the Developers. This inward development will also create local sustainable jobs, benefit local business and bring a much needed boost to the local economy. It will also serve as a Community hub, allowing people to meet and interact, something a housing estate will actively discourage.

SP8 Welsh Language and Culture

Our plan will bring the local community together and enhance its integration, keeping the Welsh language alive, rather than causing its demise due to the influx of non-Welsh speaking people.

SP9 Infrastructure

This site could be both built and managed to meet the needs of our local Community as required by the conditions of this section of the RLDP.

SP12 Placemaking and Sustainable Places

Our proposal would fully comply with the **placemaking charter** (<http://dcfw.org/placemaking/placemaking-charter/>) and we would endeavour to provide spaces to promote prosperity, health, happiness, and **well-being** in the widest sense. Furthermore we would endeavour to ensure the site was both sustainably managed (possibly with help from [INCC](#)) and built to enhance and improve the local biodiversity, with all the benefits this would bring.

SP13 Rural Development

This site absolutely fulfils the requirements of this section of the RLDP. It actively improves and enhances the available facilities accessible to the local Community, while adding and improving local facilities for all.

SP14 Maintaining and Enhancing the Natural Environment

Habitat conservation is at the heart of this proposal will include. Improving the landscape naturally, by using cattle to graze the Rhos pasture, establishing ponds and encouraging natural regeneration, meeting this requirement of the RLDP.

SP15 Protection and Enhancement of the Built and Historic Environment

The current proposal to simply destroy the existing building on this site will be revisited. Any required works will be carried out sympathetically and in an environmentally sensitive way.

SP16 Climate Change

By using sustainable methods this proposal is *protecting valuable natural assets*. There would be no need to destroy vast areas of natural land, as would be the case if a housing development was allowed.

SP18 Mineral Resources

This proposal would actively promote improvements to the environment encouraging carbon sequestration and improving the local landscape to the benefit of the environment.

SP19 Waste Management

Solar and wind power for this community site could be self sufficient for its energy and thus reducing reliance in **carbon** generation.

References

Berners-Lee, M. 'What's the Carbon Footprint ofBuilding a House'. The Guardian, 2010, Environment - Green Living Blog.

Drexler, S, A Gensior, and A Don. 'Carbon Sequestration in Hedgerow Biomass and Soil in the Temperate Climate Zone'. Regional Environmental Change 21, no. article number 74 (2021): 157-

NERR094. 'Carbon Storage and Sequestration by Habitat: A Review of the Evidence (Second Edition)'. Natural England, 2021.

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

<p>Tick here if you are submitting additional material to support your representation.</p>	
<p>6. Os ydych yn gwrthwynebu'r Cynllun Datblygu Lleol, ydych am siarad mewn sesiwn gwrandawriad yr Archwiliad cyhoeddus?</p> <p><i>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.</i></p> <p>6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?</p> <p>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.</p>	
<p><i>Nid wyf am siarad mewn sesiwn gwrandawriad ac rwyf yn fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygydd.</i></p> <p>I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.</p>	
<p><i>Rwyf am siarad mewn sesiwn gwrandawriad.</i></p> <p>I want to speak at a public hearing.</p>	
<p><i>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').</i></p> <p>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').</p>	
<p>7. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed.</p> <p>7. If you wish to speak, it would be helpful if you could indicate in which language you would liketo be heard.</p>	
<p><i>Rwy'n dymuno cael fy nghlywed yn Gymraeg.</i></p> <p>I wish to be heard in Welsh.</p>	
<p><i>Rwy'n dymuno cael fy nghlywed yn Saesneg.</i></p>	

I wish to be heard in English.	
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*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'.

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

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

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.