

# REVISED CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN (2018-2033)

## Deposit Revised LDP Representation Supporting Document

### REPRESENTATION IN RESPECT OF HOUSING ALLOCATION (POLICY HOM1)

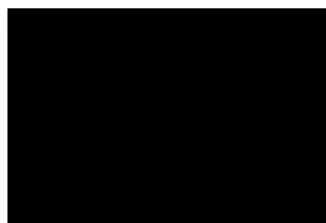
LAND AT SPRING GARDENS, WHITLAND, CARMARTHENSHIRE,  
SA34 0HL

21<sup>st</sup> March 2020



AERIAL PHOTOGRAPH SHOWING LOCATION OF PROPOSED CANDIDATE

SOURCE – Google maps)



Head of Planning  
Carmarthenshire County Council  
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Carmarthen  
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HAYSTON DEVELOPMENTS & PLANNING LTD is making an objection to the Deposit Revised Carmarthenshire Local Development Plan (DRLDP) (2018-2033) on behalf of our client, Mr Paul Evans.

In addition to a completed copy of the Deposit LDP Representation Form we provide this supporting statement setting out the merits of the proposal as a housing site allocation.

## **1.0 INTRODUCTION**

1.1 This supporting statement together with the completed Representation Form sets out our objections to the DRLDP and why we consider the document to be 'unsound'. The representation demonstrates that insufficient housing has been allocated to Whitland, and the Cluster Area that it serves and the DRLDP will therefore likely lead to an under-supply of housing.

1.2 We consider the proposed site to be well-related to the settlement, acceptable in visual impact terms and that suitable vehicular access can be provided. There are no constraints to the development of the site which can be brought forward in the short-medium term and usefully contribute to meeting the housing needs of the area. The proposed site should therefore be an allocated housing site under Policy HOM1 of the DRLDP.

1.3 This representation follows guidance provided by Carmarthenshire County Council in its 'guidance' set out on its Deposit LDP Representation Form. It supplements the information provided on that form. We have also had regard to the Planning Inspectorate Wales document on 'A Guide to the Examination of Local Development Plans.' This provides the requisite information for the Authority and the Inspectorate to assess the 'soundness' of the DRLDP and to consider the suitability of this proposed site as a housing allocation.

1.4 Section 2 of this report describes the site location and Whitland's strategic role in terms of the DRLDP aims. Section 3 describes the proposal. Section 4 assesses the evidence base in support of Whitland's growth and why the proposed housing supply for the Town will fail to achieve it. Section 5 assesses the suitability of the proposed site. Section 6 highlights why the DRLDP fails the tests of "soundness" because of an undersupply of housing for Whitland and the failure to consider the proposed site. Section 7 summarises the reasons why the site should be included in the Revised LDP.

1.5 Please find enclosed the following additional supporting information:-

- Drawing 01 – Location Plan – A3 @ Scale 1:2500
- Drawing 02 – Proposed Site Plan – A3 @ Scale 1:1000
- Appendix A – Sustainability Appraisal

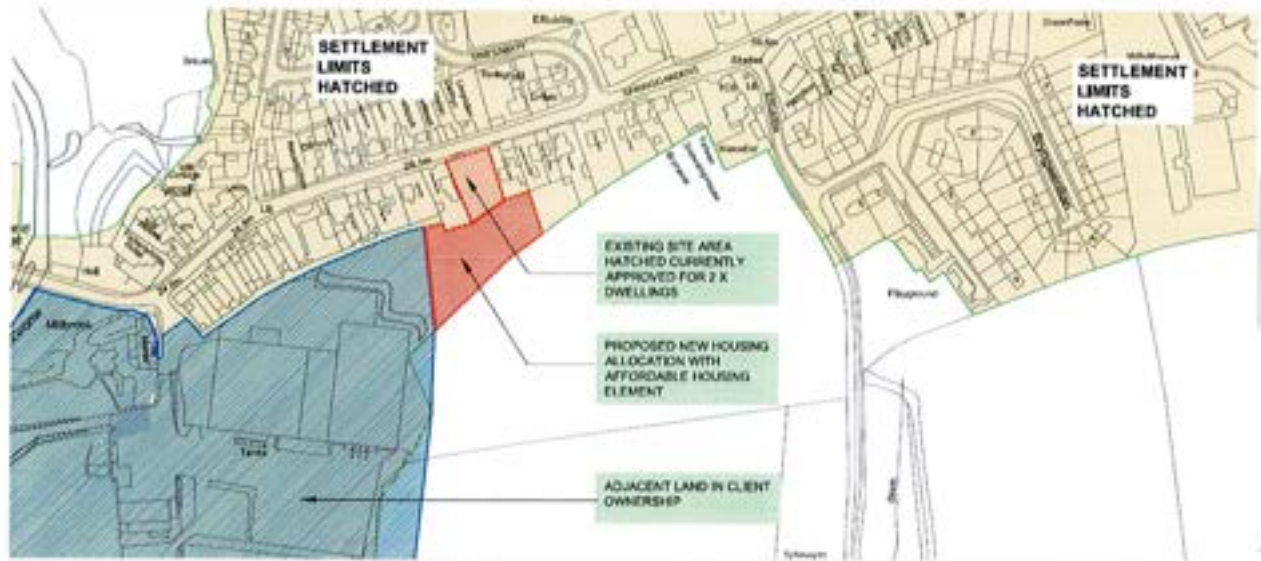
1.6 The layout is illustrative and shows a scheme of 9 units can be achieved on the site.



## 2.0 SITE DESCRIPTION AND LOCATION

2.1 The proposed site allocation is located in the centre of Whitland behind an existing housing site consented for two dwellings (W/28734) on the southern side of the B4328 which runs through the town linking at either end to the A40

2.2 The proposed site consists of a small parcel of agricultural land bounded by an existing employment site to the west, housing to the north and east and agricultural land to the south. The southern boundary of the site comprises a hedgerow which separates it from the larger fields which are accessed by a gap in the hedgerow. The site gently slopes down in a south-westerly direction.



*Site location Plan (drawing 01 extract)*

2.3 The town sits on a slight slope above the River Taf and is bisected by the River Grown which drains into it. Development is relatively linear. On a north/south axis it follows North Road, crosses Market Street and continues along the B4328 past the Station over the River Taf to the village of Trevaughn. On a west/east axis it follows runs along Market Street which feeds into Spring Gardens. The road is parallel to the railway and River Taf to the south and the A40 to the north. Roundabouts at either end of the village link to the A40. Both the A40 and railway provide a link to Haverfordwest to the west and Carmarthen to the east and on to London via Swansea, Newport, Cardiff and Bristol. The Town is therefore strategically well located and served by road and public transport.

2.4 The DRLDP has retained a settlement hierarchy but sets it within a settlement framework grouped under six clusters. Whitland is identified as a tier 2 Service Centre within Cluster 6 which covers the west of the County. The Deposit Plan notes Whitland's key service centre role in terms of supporting the social, employment, education and localised retail offer for smaller settlements. It also notes the cluster's links to West Wales and the wider transport network via the A40 and the London – Fishguard railway route. The Plan's strategy is to distribute growth based on sustainability principles with development in Cluster 6 being focussed in Whitland and St Clears (Deposit Plan paragraph 10.28). A Service Village category allows for small scale employment, housing allocations for larger sites, affordable housing provision on sites of 5 or more units, small housing sites (under 5 homes) and windfall housing opportunities within development limits.





4.2 The DRLDP has allocated two housing sites for Whitland under Policy HMO1:

SeC19/h1 - Land at Park View, Trevaughan for 8 dwellings anticipated to come forward in phase 2 of 3 of the Plan: and

SeC19/h2 - Land at Whitland Creamery for 48 dwellings anticipated to come forward in phase 2 of the Plan.

The total housing land allocation for Whitland to 2033 is therefore 56 dwellings. The settlement boundary is drawn tightly around the built-up area leaving little scope for small sites and windfall development to add to the potential housing supply.

4.3 The current LDP accords Whitland the same status as the DRLDP in terms of settlement hierarchy identifying it as a service village. In the current plan land is allocated for 205 dwellings for the 15-year period from 2006 to 2021. The updated Topic Paper on Role and Function (January 2020) provides the main evidence base which "informs the considerations of spatial framework and growth distribution" (paragraph 1). The paper notes that Whitland fulfils a service centre role, is sustainably located by virtue of its transport links, and states that:

**"Given its strategic cross border location, it is an important town for the development of new housing and employment" (paragraph 6.236).**

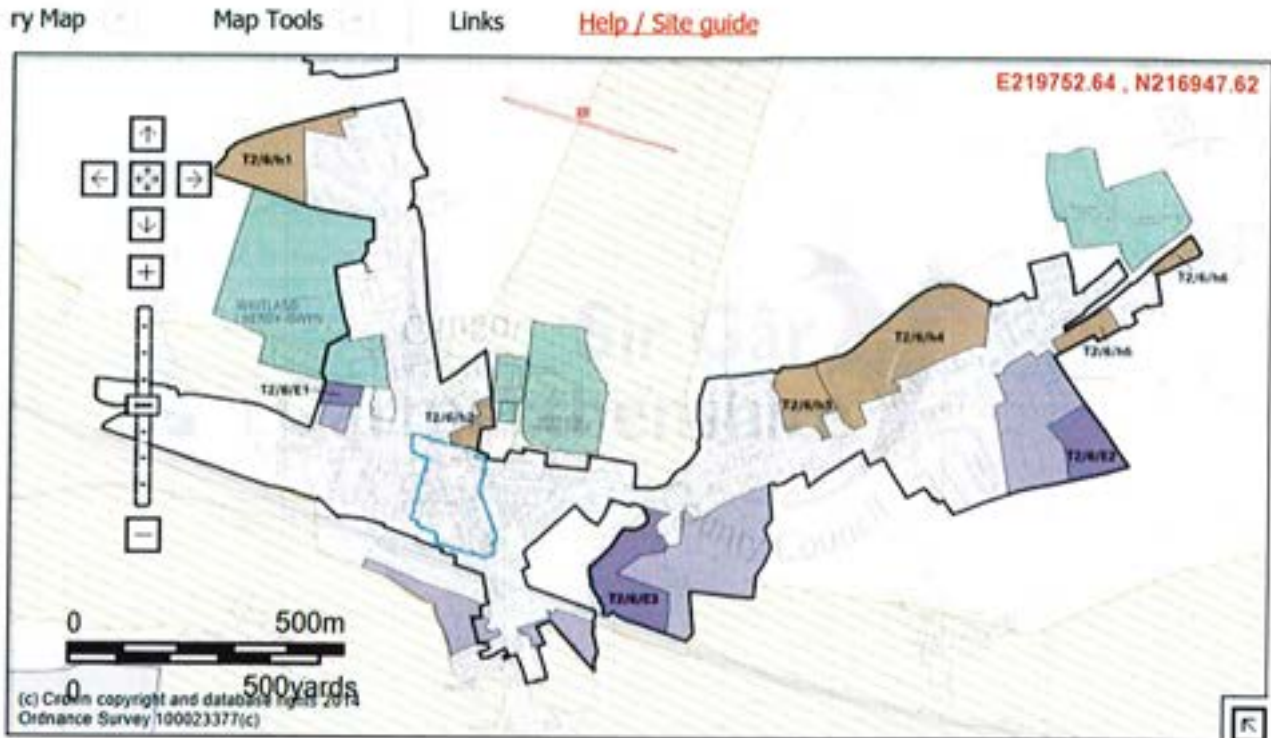
It notes that housing development has not taken place on all the current LDP allocated sites with 118 of the 205 units remaining undelivered. This suggests that 87 units were delivered from allocated sites over the plan period to date.

Consequently, the following 3 sites totalling 168 dwellings have been de-allocated in the RDLP (see proposals map extracts below):

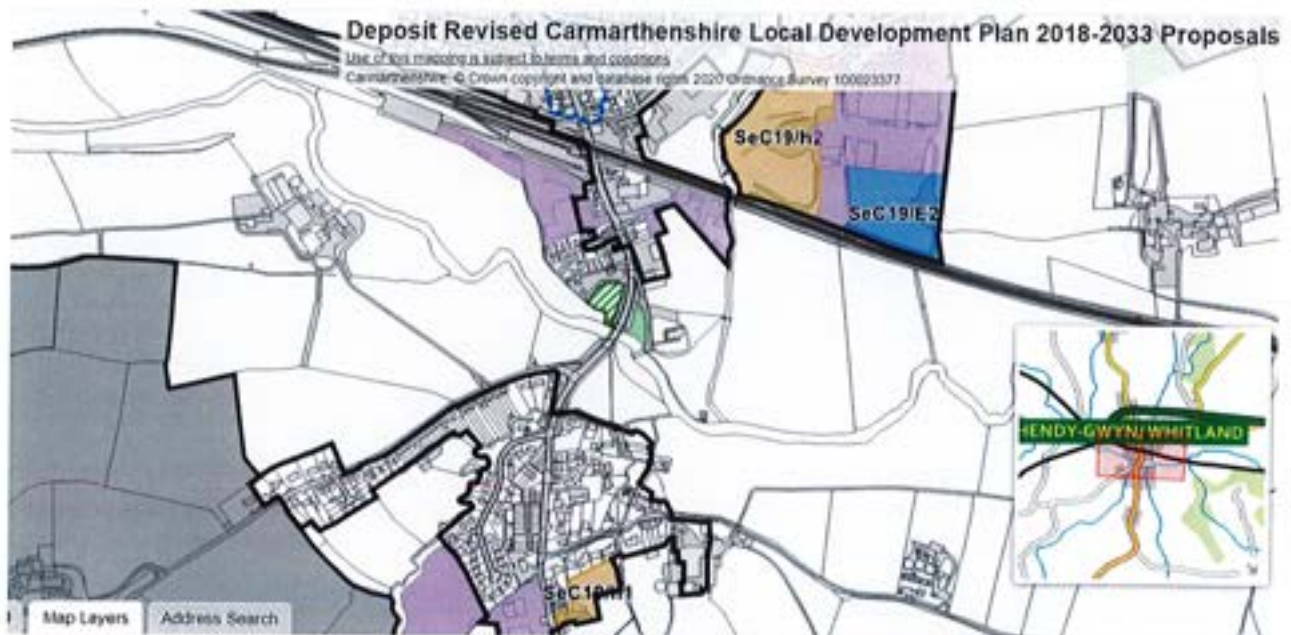
- T2/6/h1 - Lon Hywel allocated for 32 units
- T2/6/h3 – land adjacent to Maes Abaty allocated for 72 units
- T2/6/h4 – land adjacent to Spring Gardens for 64 dwellings

4.4 The topic paper suggests that the distribution of growth within the current adopted LDP is proportionate to its role and function. It then quotes the housing delivery rate as if to suggest that the two are directly linked i.e. that the delivery is proportionate and reflects the role and function of the town. However, Whitland may have underperformed in terms of housing delivery for a variety of reasons such as a landowner's unwillingness to sell, or that the early stage of the Plan corresponded with an economic slow-down following the financial crisis. Also, the size of the larger sites (72 and 64 units) may have put off developers, many of whom comprise small local building companies who do not have the capacity to deliver big housing projects. Notwithstanding that some sites remained undeveloped the 87 units that were delivered is substantially more than is proposed in the DRLDP.





**Current LDP (housing allocations shaded orange/brown) source: CCC website**



**Deposit Revised LDP with fewer housing allocations (shaded orange) source: CCC website**

4.5 The Role and Function Topic Paper also refers to the trend over recent years of low completions in Tier 2 (Service Centres) but states in paragraph 4.15 that:

*"Tier 2, however is anticipated to deliver more units in the next 5 years as 69.6% of the remaining units fall within the 5-year supply, where the development of sites in Burry Port,*



*Pembrey and Whitland are likely to start"*

4.6 Furthermore, Whitland is likely to increase in importance in the coming decade, given the recently published consultation on healthcare in the area. In all 3 of the final options put forward by the Hywel Dda University Health Board a new hospital is proposed between Narberth and St Clears on the A40 (<http://www.wales.nhs.uk/sitesplus/862/page/95315>). The new hospital would provide Accident and Emergency and major operations for patients across much of West Wales. The hospital will be a key driver for growth in Whitland which will provide a central location for workers to live, with the proposed site providing an important contribution to meeting that need.

4.7 Whitland has been identified as one of 10 key towns that support rural Carmarthenshire in a Report of the Carmarthenshire Rural Affairs Task Group – Moving Carmarthenshire Forward (June 2019) (MCF). Section 3 of the report provides findings and recommendations. It states that:

*"there is a need to ensure that appropriate housing is available for local need, which includes availability of affordable housing. In order to make our rural communities sustainable we need to enable younger and working age people to be able to live there. The current housing market is driving people out of their indigenous communities and preventing them from returning home. There needs to be a move in local planning policy from larger housing developments in our main towns to an approach which enables a suitable mix and proportion of development in our rural towns and communities to address local housing demand and need."*

4.8 The Carmarthenshire Rural Needs Study 2019 identified Whitland as having the second largest proportion of younger people (aged 15-44) (32%), many of whom will struggle to afford open market housing. Any development that includes a proportion of market and affordable housing, as proposed by our client, will ensure that some of that need can be met.

4.9 Recommendation 10 of the MCF specifically highlights the need for the Council to ensure that the revised Local Development Plan "enables appropriate scale residential and business development in smaller community areas as needed".

It recommended that the Council work with stakeholders and communities to develop plans for each settlement to deliver a long-term strategic vision to secure economic, cultural, social and environmental sustainability.

4.10 Unfortunately, the DRLDP timetable has not converged with the production of these settlement-based plans which have yet to be produced. Nevertheless, the implications are clear that the DRLDP should ensure that enough land is available for Whitland to grow in the future. The DRLDP fails in this regard providing less housing land than was historically the case and not enough to provide for future housing based on past trends, let alone to accommodate the Council's growth aspirations as part of the Ten Towns initiative.

4.11 The Council's own evidence demonstrates that it has consistently failed to provide an adequate housing supply. Planning Policy Wales- Edition 10 (December 2018) (PPW) sets the requirements with respect to land supply. It states that local planning authorities must ensure that sufficient land is genuinely available to provide a five-year supply of housing land measured against the development plan housing requirement (paragraph 4.2.15). Annual Joint Housing Land Availability Studies (JHLAS) assess whether authorities are meeting that requirement. Carmarthenshire County Council's most recent study for 2019 demonstrates that that over the life of the LDP, from its adoption in December 2014, the Plan failed to meet its housing supply in every year (see table below) with the situation worsening in 2018 and 2019.

### Appendix 3 – Previous Land Supply Data

Year	5 Year supply – Number of homes (TAN 1 categories)			Number of years supply	Supply beyond 5 years – Number of homes	
	U/C	1	2		3i	3ii
2011	262	242	1,756	4.4	7,321	60
2012	212	311	1,795	4.1	6,682	39
2013	176	354	2,640	5.3	5,923	39
2014	290	377	2,378	4.9	5,911	39

After 2015

Year	5 Year supply – Number of homes (TAN 1 categories)		Number of years supply	Supply beyond 5 years – Number of homes	
	1	2		3	4
2015	345	4467	3.7	0	6336
2016	250	5805	4.1	0	5342
2017	240	6108	4.2	0	4451
2018	171	5781	3.8	0	4443
2019	295	5441	3.5	4320	0

### Carmarthenshire County Council JHLAS 2019

4.12 During the LDP candidate site process eight potential housing sites in, or close to, Whitland were submitted for consideration. Of those eight sites only two were allocated for housing. A further two were considered too small to allocate and were recommended for inclusion within Whitland development limit (see table below). Larger sites were dismissed because of the scale and deliverability of development proposed (SR/163/001) and their suitability (SR/163/005).

Candidate Site ref	Size (Hectares)	Allocated in DRLDP	Comments from the Site Assessment Table (January 2020)
Candidate Site SR/163/001 Land at Brynmelin	4.55	No	The scale of the proposed development would be detriment to the character of the area, in addition to potential issues surrounding the deliverability of a site of this scale within Whitland. There is sufficient and more suitable land available within the settlement to accommodate new growth.
Candidate Site SR/163/002 Land opposite Llwyn Brain Farm, Tavernspite	0.27	No	The site does not comply with the provisions of the Preferred Strategy as it is divorced from the settlement and would result in development in the open countryside.
Candidate Site SR/163/003	0.2	Development Limit Limit	The site is partly located within a C1 flood risk zone, however it will be included within development limits owing to its central



Land adjacent Westgate, Westgate Street			location in the town.
Candidate Site SR/163/004 Land to the rear of Market Street	0.05	Development Limit	The site cannot accommodate 5 or more dwellings, however, it will be included within the development limits.
Candidate Site SR/163/005 Ty Newydd, Ael Y Bryn Farm	3.19	No	There is sufficient and more suitable land available within the settlement to accommodate new growth.
Candidate Site SR/163/008 Site B - Land at and adjacent to Whitland Creamery	1.31	Yes	The site is previously developed land and there are no adverse impacts to its development. Site to be allocated with reference SeC19/h2
Candidate Site SR/163/009 Site C - Land adjacent to Whitland Creamery Mixed use inc. Housing		Employment	Site to be allocated for proposed employment with reference SeC19/E2 (Land South of Former Creamery), to reflect its location in relation to the former Whitland Creamery
Candidate Site SR/163/010 Part of Park View, Trevaughan, Whitland		Yes	Part of the site it be allocated with reference SeC19/h1. This is to allow small scale development within the town.

4.13 Although the objection site was not submitted through the candidate sites process it is suitable and deliverable and has none of the constraints that resulted in the above sites being excluded from the DRLDP. The Sustainability Appraisal (Appendix A demonstrates that it meets all the criteria to be considered sustainable development. The site is also small and as such there would be none of the deliverability issues identified for larger sites. Section 5 provides a more detailed site assessment highlighting its suitability for development.

## **5.0 SITE ASSESSMENT**

5.1 The proposed allocation is an edge of settlement site immediately adjacent to housing land with planning permission for two dwellings. It is surrounded by development on three sides: proposed and existing housing to the north and east; and employment to the west. The only remaining previously developed sites that would be suitable for development are in our client's ownership. Two of the sites have been allocated: for housing (SeC19/h2) and employment (SeC19/E1), respectively. A third is subject of another representation in which it is proposed for a mixed-use comprising retail, commercial and employment. No residential development is proposed on that site because it site lies within a C1 flood risk zone and is not therefore considered by Natural Resources Wales to be suitable for housing. As a result, there is no further scope for previously developed land to deliver housing in Whitland. As such the site proposed under this representation is acceptable in terms of the sequential approach to identifying land set out in PPW, which favours previously developed land followed edge of settlement sites.

### ***Sustainability of Location***

5.2 Whitland is well connected by road and rail to both West and East Wales and on to England. It has been identified in the DRLDP as a service centre in recognition of its key role in supporting rural communities within Carmarthenshire and across the border into Pembrokeshire and is therefore considered to be a sustainable location for new development. Services available in the town include:

- Served by six bus routes: the 223; 224; 322; 351; 352 and 381 which variously connect the Town to Carmarthen, St Clears, Tenby, Kilgetty, Haverfordwest, Saundersfoot and Pendine.
- A railway station connects Whitland to Haverfordwest, Carmarthen and on to London.
- Ysgol Llys Hywelit (Primary School) and Dyffryn Taff (secondary school) are within 1 kilometre of the site.
- There's a large recreation ground and various sports clubs including bowling, rugby and cricket within easy walking distance.
- The retail centre is less than a kilometre distant with a variety of shops including a Coop store.
- There are a variety of employers from engineering companies to hi tech medical suppliers and in addition to existing industrial estates and employment sites the DRLDP has allocated land to enable the extension of two existing estates SeC19/E1 and SeC19/E2
- A doctor's surgery
- Pubs, restaurants and takeaways.
- A heritage centre and gardens (Hywel Dda)

### ***Landscape and Visual Impact***

5.3 The site is surrounded by development on three sides and delineated by the rear hedgerow boundary that extends from the employment site to the east along the rear of residential properties west of the site. The hedgerow forms a logical settlement boundary at this location as can be seen from the satellite and street map images below.





*Satellite image of the site source:googleearth*



*Google earth street view image of the site from Spring Gardens Road Front*

5.4 The proposed development would effectively infill the built envelope at this location. There would be no visual impact from Spring Gardens as road is residential in character and the site would lie behind the consented housing units. It is currently only partially visible from the road when standing directly opposite the site and only in glimpses by passing traffic. Views from the adjacent employment site would be largely screened by landscaped boundary treatments proposed along the western edge of the site and there are no public rights of way from which it would be visible.

5.5 The indicative layout in the proposed site plan (drawing 02) demonstrates that sufficient distance can be achieved between the proposed dwellings and those fronting Spring Gardens to ensure that the visual impact in terms of outlook would be acceptable and there would be no issues in terms of loss of privacy. From long distance views, the site would be



seen as a logical "shoe in" with existing development, rather than an extension into the open countryside.

5.6 A constraint check of the site indicates that the proposed site is not within any special landscape area or other designation and would not materially affect any heritage assets such as conservation areas and listed buildings.

5.7 LANDMAP, a landscape assessment tool produced by NRW which assesses landscape qualities against five different aspects. It identifies the geological, visual and historic landscape in the area as being of moderate importance. The only aspect that scores a high value is the cultural one because Whitland is thought to have been the place Hywel Dda wrote the first Welsh laws and because of Whitland Abbey. However, the mapped cultural aspect area extends mainly north of the site and its development would have no impact on the cultural significance of the area.

### ***Ecology***

5.8 The development would not fall within, or be likely to affect, a SAC, SPA or Ramsar site, a SSSI, LNR, RIGS, or SNCI.

5.9 The LANDMAP habitat aspect notes that the area generally is of moderate value comprising improved grassland. The site comprises Improved grassland which is generally considered to be of low ecological value. There are a couple of mature trees close to the western boundary of the site, but these should remain unaffected by the development. Any concerns at the detailed design stage regarding possible effects of development could be dealt with by an aboricultural survey and appropriate mitigation at that time. The existing southern boundary hedgerow would be retained.

5.10 A Phase 1 Habitat survey should be undertaken to establish the presence of any protected species and to determine the value of any habitat on the site.

5.11 Any development would incorporate the existing natural site features. Site surveys accompanying any planning application would also provide guidance for the final layout design, which could easily be adjusted to retain as many natural features as possible. Any possible loss of features could be minimised and mitigated/enhanced by additional/supplementary strategic planting and landscaping. Overall, it is considered that development of the site would offer potential to improve the biodiversity of the site in line with Welsh Government Guidance.

### ***Heritage Assets***

5.12 According to Carmarthenshire County Council's constraints map there are no heritage assets in the vicinity that would either be directly or indirectly affected by the development of the proposed site allocation. No part of the settlement is designated a conservation area and although there are some listed buildings in the locality, none are close to the proposed site allocation. As noted above LANDMAP describes the area as being of moderate importance in terms of historic landscape.

### ***Flood Risk***

5.13 The proposed site allocation would fall within Flood Risk Zone A which is at a low risk of flooding. In any formal application for development, appropriate drainage measures would be incorporated into the final scheme. For example, soakaways would be provided within the site to accommodate run-off from buildings and roads.



### **Access**

5.14 Access to the site would be from Spring Gardens. There is at present a dropped kerb and some work has been carried out on the access for the two consented dwellings. However, these would need to be revised if the proposed site is accepted. The indicative layout demonstrates that adequate parking can be provided to serve nine dwellings.

5.15 There is a 30mph limit along Spring Garden as it runs past the site and visibility at the proposed access point is good. There are pavements and street- lights from the site access in either direction, which allows for safe pedestrian access to the town, station and bus stops and as noted above the site is accessible by foot to all the towns services.

5.16 Development of nine units would only lead to a modest increase in traffic movements to and from the site and would be acceptable in terms of highway safety, although the suitability of access arrangements would require the appropriate assessment of the CCC Highways Department.

### **Services**

5.17 Services can easily and connected to the site. Subject to advice from the statutory utilities providers it is anticipated that there is capacity within existing systems regarding water supply and the sewerage and the treatment works, particularly given that no issues were raised with regard to the existing consent and that the Authority has allocated land for 48 dwellings a short distance from the site.

## **6.0 Soundness Tests**

6.1 The above sections have demonstrated the site is suitable for development and there are no significant constraints to bringing the site forward. This section identifies why the plan in its current form is unsound, with particular reference to section 4 of this report on housing delivery. The inclusion of the proposed site would go some way to rectifying the shortcomings of the Plan with regard to providing more housing land in Whitland.

6.2 The Local Development Plan Manual Edition 2 (August 2015) published by Welsh Government sets three tests or questions that need to be addressed in order to establish whether a Plan is sound. They are:

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

There are a series of sub-questions to help answer the key test questions. The most relevant to this report are:

- Does it seek to meet assessed needs and contribute to the achievement of sustainable development? (Test 2)
- Have the 'real' alternatives been properly considered? (Test 2)

6.3 Test 2: Is the plan appropriate in terms of meeting needs and contributing to sustainable development (Test 2) and will the plan deliver (Test 3)?

The DRLDP recognises the importance of Whitland to Western Carmarthenshire and the wider region because of its connectivity via the A40 and the railway. Its importance in serving rural Carmarthenshire is recognised in its identification as a service centre. However, the level of housing land allocated for the Town does not reflect its cross-border importance as a centre serving parts of South East Pembrokeshire. Also, it does not take account of likely growth arising from the proposed new hospital, or Whitland's identification as one of the ten rural towns to be the focus of growth over the Plan period. The amount of housing land allocated is only 27% (56/205x100%) of that which is allocated in the current LDP despite it being accorded the same status in the settlement hierarchy in both plans. Accepting that some of the housing allocations in the current LDP were not deliverable, the DRLDP should have included more smaller sites to compensate for their loss. Failure to do so means that the plan will not meet the needs of the area and therefore will not deliver the growth that the plan has identified as being necessary. Thus, it fails soundness tests 2 and 3 in this regard.

### 6.4 Have the 'real' alternatives been properly considered? (Test 2)

The Council's Development Limits Topic Paper (December 2018) provides the methodology the Council was supposed to adopt when reviewing development limits. Section 7.5 details how settlement limits should take account of the Plan's strategy and national guidance by amongst other things:

- directing development to settlements identified within the preferred strategy in a manner consistent with its strategic objectives, policies and provisions;
- relating development to opportunities in settlements to the growth required in the plan period;
- ensuring that the identified growth is appropriately distributed in accordance with the Preferred Strategy.

Section 8 details how development limits should be drawn to achieve the above aims including that they should:

- Where appropriate, follow physical features such hedgerows (8.2)
- Make provision for appropriate infill within, logical extensions to, or rounding off of defined settlements (8.4).

6.5 The DRLDP settlement boundary is drawn tightly around the built envelope of the town within which allocations for housing land provide for limited growth which is not commensurate with its role in the preferred strategy. There is no scope for appropriate infill, logical extensions or rounding off to compensate for the lack of allocated housing land. The proposed site is the only logical infill site that is not otherwise protected by open space designations, allocated or considered unsuitable because of delivery concerns. Failure to include the site in the settlement boundary at Deposit stage, or consider it as an alternative site, is contrary to the Council's own methodology and soundness test 2 with respect to alternative site consideration.

## 7.0 Conclusion

7.1 Whitland is a strategically important town because of its cross-border location and access to rail and road transport networks. It is also identified in the DRLDP strategy as being important to support the growth of surrounding rural communities. The town is likely to



increase in importance in the coming decade, given that a new hospital will be built nearby on the A40 between Narberth and St Clears. The DRLDP has failed to provide housing land proportionate to the Towns current and future role and will thus inhibit rather than encourage its growth.

7.2 For the above reasons and as set out in section 6 of this report the DRLDP fails soundness tests 1 and 2.

7.3 The proposed site provides a logical infill site which fits with the Council's development limit methodology and would make up for the short fall in housing supply in the proposed plan. There are no constraints that would affect its development and it is located within safe walking distance of services, employment and public transport. It would provide both market and affordable housing. The sustainability appraisal (Appendix A) demonstrates that the site meets all the sustainability criteria with the exception of previously developed land, although it is an edge of settlement site.

7.4 For all of the above reasons the development limit for Whitland should be revised and our Client's land allocated in the final version of the revised LDP.

7.5 It is anticipated that the development could proceed on the site within the first phase of the revised local plan period (2021-2024).

If any further information is required or alternative options/solutions need to be discussed please do not hesitate to contact Hayston Developments & Planning Ltd.

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PLANNER**

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DIRECTOR/PRINCIPAL PLANNER**



**RTPI**

mediation of space · making of place

# **APPENDICES**



Question	Data Source	Relevant SA Objective(s)	Blank Column for Comments (Please Feel Free to Detach and Complete for Your Site)
Q1. Is the site compatible against the location of future growth presented in the Deposit LDP?	LDP Deposit Plan	SA1	<p><b>Alternative formats are acceptable</b></p> <p>Yes. Whitland is identified in the Deposit Plan strategy as a tier 2 service centre serving cluster 6 which covers west Carmarthenshire. Service centres support the social, employment, education and localised retail offer for the smaller settlements in the area. The strategy notes that the cluster is well connected to the West Wales and the wider transport network via the A40, A477 and the London – Fishguard railway route (para 10.28). It's importance as a key rural town is recognised in its identification as one of the Ten Towns for which individual plans will be produced to secure their economic, cultural, social and environmental sustainability (paragraph 3.13 of the Deposit Plan).</p>
Q4. Is the site located within a flood risk zone as identified in the TAN 15 Development Advice Maps? (C1 or C2 Zone)	<p>Background information:  <a href="https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-developers/development-and-flood-risk/?lang=en">https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-developers/development-and-flood-risk/?lang=en</a>            Maps:  <a href="http://geodiscoverer/">http://geodiscoverer/</a>            Click and search for:  <input type="checkbox"/> TAN15 Zone C1  <input type="checkbox"/> TAN15 Zone C2</p>	SA4, SA5	No, the site is in Zone A which means it is considered to be at little or no risk of fluvial or coastal/tidal flooding.

Q5. Is the site located within or immediately adjacent to any sites designated for importance to nature conservation?	LDP Constraints Maps: <a href="https://carmarthenshire.org.uk/planning/local-plan/maps/carlidpconstraints">https://carmarthenshire.org.uk/planning/local-plan/maps/carlidpconstraints</a> Sites to be identified are: <input type="checkbox"/> Sites of Special Scientific Interest (SSSI) <input type="checkbox"/> Special Areas of Conservation (SAC) <input type="checkbox"/> Special Protection Areas (SPA) <input type="checkbox"/> National Nature Reserves (NNR) <input type="checkbox"/> Local Nature Reserves (LNR) <input type="checkbox"/> Common Land or registered village green	SA2	No
Q6. Is the site located within or immediately adjacent to any Scheduled Monuments?	LDP Constraints Maps: <a href="https://carmarthenshire.org.uk/planning/local-plan/maps/carlidpconstraints">https://carmarthenshire.org.uk/planning/local-plan/maps/carlidpconstraints</a>	SA8	No
Q8. Would the development of the site have a detrimental impact on the character and setting of the settlement or its features?	Full reference should be made to the LDP Site Assessment Methodology. Found here: <a href="https://www.carmarthenshire.gov.wales/home/council-services/planning/local">https://www.carmarthenshire.gov.wales/home/council-services/planning/local</a>	SA8 SA9	No. The site is immediately adjacent to the settlement boundary and to the rear of a site with consent for two dwellings. The settlement boundary to the east of the site follows a hedgerow which continues along the rear (south) of the site ending where it meets the allocated employment site that is part of the former Whitland Creamery. It is this feature that forms the natural edge of the village at this location and thus would make a more logical



<p>development-plan-2018-2033/development-of-an-evidence-base</p>	<p>settlement boundary than that which is proposed in the Deposit Plan.</p>	
<p>Q9. Will the proposal involve the re-use of suitable previously developed land and/or buildings?</p>	<p>Full reference should be made to the LDP Site Assessment Methodology. Found here: <a href="https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base">https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base</a></p>	<p>SA9, SA7 No.</p>
<p>Q12 Have any significant and evidenced highway issues been identified relating to the site?</p>	<p>Full reference should be made to the LDP Site Assessment Methodology. Found here: <a href="https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base">https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base</a></p>	<p>SA3 No.</p>
<p>Q13 Does the site have suitable access to public transport and/or active travel route?</p>	<p>LDP Constraints Maps: <a href="https://carmarthenshire.opus4.co.uk/planning/localplan/map/s/carlpdfconstraints">https://carmarthenshire.opus4.co.uk/planning/localplan/map/s/carlpdfconstraints</a></p>	<p>SA3, SA4, SA6, SA12, SA13, SA15 Yes. The site is less than 1 kilometre from Whitland Station which connects to Haverfordwest and Carmarthen and further to Cardiff and on to London. A bus stop opposite the station also provides services to Carmarthen, Haverfordwest, Kilgetty and Tenby. Spring Gardens has lit footways connecting to the Town Centre and station.</p>

Q14 Does the site have access to green space/ leisure/ recreational facilities that are within a reasonable distance?	LDP Proposals Maps: <a href="https://carmarthenshire.opus4.co.uk/planning/localplan/maps/carliddprop">https://carmarthenshire.opus4.co.uk/planning/localplan/maps/carliddprop</a>	SA12, SA15	Yes. There's a large recreation ground within less than 0.5 kilometres of the site.
Q15 Is the site within reasonable distance to: (a) Employment provision (b) Retail provision (c) Other services and facilities	Full reference should be made to the LDP Site Assessment Methodology. Found here: <a href="https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base">https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base</a>	SA6, SA10, SA14, SA15	<p>Yes. The western edge of the site shares a boundary with an existing employment site with land allocated for employment to the rear of it. There is another existing employment site approximately 0.5 kilometres to the east and there are bus and train services to Carmarthen the County Town.</p> <p>It lies within easy walking distance of the retail centre (approximately 0.6 kilometres). The Town Hall, a local pub and various sports clubs all lie within easy walking distance of the site (less than 1 kilometre).</p>
Q16 Is the site within a reasonable distance to education facilities?	Full reference should be made to the LDP Site Assessment Methodology. Found here: <a href="https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base">https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base</a>	SA13	Yes, Ysgol Llys Hywelit (Primary School) is within 0.4 kilometres of the site and Dyffryn Taff secondary school is within 1 kilometre.



Q17 Is the site located within or adjacent to a mineral buffer zone?	LDP Constraints Maps: <a href="https://carmarthenshire.opus4.co.uk/planning/localplan/maps/carlpcconstraints">https://carmarthenshire.opus4.co.uk/planning/localplan/maps/carlpcconstraints</a>	SA6	No
Q18 Is the site within or immediately adjacent to an AQMA?	LDP Constraints Maps: <a href="https://carmarthenshire.opus4.co.uk/planning/localplan/maps/carlpcconstraints">https://carmarthenshire.opus4.co.uk/planning/localplan/maps/carlpcconstraints</a>	SA3	No
Q19 Does the site contain high carbon soil e.g. peat?	A map of peat resources can be found here: <a href="https://www.bgs.ac.uk/mineralsuk/search/home.html">https://www.bgs.ac.uk/mineralsuk/search/home.html</a>	SA7	No
Q20 Does the site contain high quality agricultural land?	Maps: <a href="http://geodiscoverer/">http://geodiscoverer/</a> Click and search for: <input checked="" type="checkbox"/> Predictive Agricultural Land Classification	SA7	The small size of the field and the fact that is bounded development on three sides and a hedgerow to the rear make it unviable for farming.
Q21 Are there any significant concerns set out in the SFCA - Stage 1 which could impact on the delivery of the site?	The Stage 1 SFCA of all candidate sites can be accessed here: <a href="https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base">https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base</a>	SA4, SA5	No

Q22 Does the site have an available water connection?	Full reference should be made to the LDP Site Assessment Methodology. Found here: <a href="https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base">https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base</a>	SA5	Yes
Q23 Does the site have a suitable sewerage connection?	Full reference should be made to the LDP Site Assessment Methodology. Found here: <a href="https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base">https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base</a>	SA5	Yes
Q25 Does the location and/or scale of the site have the potential to have a detrimental impact on Welsh Language?	Full reference should be made to the LDP Site Assessment Methodology. Found here: <a href="https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base">https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/development-of-an-evidence-base</a>	SA11	No. The site is relatively small with an indicative layout for 9 dwellings. Although the site could be brought forward in the first phase of the Plan if there were any concerns over impact on language it could be pushed back to later phases.



## SUMMARY

Soltys Brewster Ecology were commissioned to undertake an updated ecological appraisal of the Former Dairy Crest Site located in Whitland, Carmarthenshire in September 2014, which was originally surveyed by Soltys Brewster Ecology (SBE) in September 2007. The site has been identified as a strategic regeneration site within the adopted Unitary Development Plan UDP (Ref: PDB13 Whitland Creamery) and as a site for Mixed Use redevelopment within the Deposit Local Development Plan LDP (Ref: T2/6/MU1) which is due to supersede the UDP in late 2014. To inform promotion of the site an assessment of the existing ecological constraints/ opportunities associated with any potential development was undertaken.

Desk based consultation confirmed that the site did not contain any statutory or non-statutory conservation designations. The application site does not hold records of protected fauna although there were numerous records of protected bird and mammal species in the local area (1km radius). A review of survey report produced in 2007 identified that the habitats within the application site had changed relatively little with the exception of the demolition of several buildings in the north of the site and a length of hedgerow along the eastern boundary. Scrub and ruderal habitats within the development site had also been subject to natural vegetative succession in the intervening years.

In terms of development potential, the areas of hard standing, bare earth and improved grassland were considered of little or no ecological interest and represent the most suitable parts of the site for development. The species poor hedgerows, semi improved grassland, tall ruderal habitat, scrub, riparian corridor, treelines and standard trees were considered of local ecological interest in the context of the site and are likely to provide resources for reptiles, birds and foraging and commuting mammals as well as contributing to local habitat connectivity. The hedgerows, riparian corridor and an appropriate 'buffer strip' should be retained as far as practicable and used to frame the development footprint. Where possible the retained hedgerow should not form part of the boundary of residential gardens created as part of any development to ensure they are protected from removal or damage by residents.

Any proposed street lighting should be designed/ oriented to avoid illuminating the retained vegetation and riparian corridor in consideration of their likely function as wildlife corridors, and both bird and mammal foraging and commuting habitats.

Given the itinerant nature of many bat species, 'reasonable avoidance measures' as part of proposed demolition work concerning the disused red brick commercial structures is recommended. Implementation of these measures could be controlled via a suitably worded planning condition.

A number of mature standard trees were considered to be category 2 bat trees due to their mature nature, size and ivy coverage preventing thorough examination from the ground. It is recommended that on a precautionary basis, if

## 7.0 CONCLUSION

- 7.1 This Statement has assessed the accessibility of this application site and established the likely impact of the redevelopment of the former Creamery in Whitland and the associated highway and transport consequences.
- 7.2 The report concludes that the proposed development is consistent with the national, regional and local planning and transport policies including the Local Plan. It will have no perceptible detrimental impact on surrounding junctions with minimal traffic generation especially if considering the past historic uses of the site.
- 7.3 It is therefore felt that there are no grounds in transportation terms for refusal of this application.



## 6.0 Summary and Conclusions

- 6.1 This Landscape and Visual Appraisal has examined the likely effects of the proposed Whitland former creamery site mix use development on landscape character and visual amenity within a 3km radius study area.
- 6.2 No statutory or non-statutory landscape designations fall within the 3km study area. Four SAMs are located within the study area, but two of the SAMs are located outside of the visual envelope. For the two SAMs that fall within the visual envelope, which includes the SAM located nearest to the site, it is concluded that the proposed mix used development would not adversely affect the setting the SAMs.
- 6.3 The site is located within the LANDMAP Visual and Sensory Aspect Area classified as Urban, which has a value of moderate/ low. Assessment of effects of the proposed mix use development on landscape character concluded that the effects would not be significant. The proposed mix use development located within the settlement boundary of Whitland would integrate into the urban character and would not result in a loss of the existing landscape qualities.
- 6.4 The visual envelope drawing (see Figure 4) shows that the proposed mix use development would be mostly visible from the central area of the study area. The majority of views would be concentrated to areas within close proximity to the site, which are influenced by the surrounding urban setting and the main communication routes that transect the study area. As distance increases away from the site, the visibility of the site reduces to elevated areas to the north and south within the study area. From these areas, the site would be viewed in context with Whitland, which includes industrial influences.
- 6.5 Three viewpoints were assessed within the study area, which ranged from locations within close proximity to the site and more distant views. From all the viewpoints assessed the significance of effects was concluded to be not significant. The site is located on pre-developed lowland and is likely to have visually screened or significantly filtered views by surrounding vegetation that includes surrounding vegetation. More distance views are likely to be reduced to roofscape views and would be viewed within the context of the wider settlement and against the back drop of larger scale industrial units.
- 6.6 Overall the site offers a good opportunity for the proposed mix use development without detrimental impacts on landscape character or visual amenity. Development on the proposed site is supported by the Carmarthenshire planning policy given that it is located within the settlement boundary of Whitland and that the site has been previously developed.

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

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

*Hoffem gael eich barn am y Cynllun Datblygu Lleol Diwygiedig Adneuo (Cynllun Datblygu Lleol) ac ar ddogfennau sy'n ceFnogi'r Cynllun Datblygu Lleol.*

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

*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.*

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.

*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.*

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.

***Mae'n rhaid derbyn eich sylwadau erbyn 4:30pm ar y 27 o Fawrth 2020.***

**Your representations must be received by 4:30pm on the 27th March 2020.**

*Dychwelwch ffurfienni at:*

Please return forms to:

*Rheolwr Blaen-gynllunio, Isadran Cynllunio, Adran Y Amgylchedd, 3 Heol Spilman, Caerfyrddin, SA31 1LE*

Forward Planning Manager, Planning Division, Environment Department, 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**

Paul Evans

Andrew Vaughan-Harries

<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)		Hayston Developments and Planning Ltd
<i>Cyfeiriad</i> Address		
<i>Rhif ffôn</i> Telephone no		
<i>E-bost</i> Email address		
<i>Llofnodwyd</i> Signed		
<i>Dyddiad</i> Date		
<b>RHAN B: Eich sylw</b> <b>PART B: Your representation</b>		
<i>Eich enw / sefydliad</i> Your name / organisation	Not applicable	
<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> LDP policy or site allocation number(s)		
<i>Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran</i> LDP paragraph or section number(s)		
<i>Cyfeiriad(au) Map Cynigion y Cynllun</i>	Whitland	



<p><i>Datblygu Lleol</i></p> <p>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></p> <p>If your representation relates to a supporting document' including the:</p> <p>Sustainability Appraisal), and/or</p> <p>Habitat Regulations Assessment</p> <p>insert the name of the document and section reference(s) and/or paragraph number here.</p>	
<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>	
<p><i>Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol.</i></p> <p>I think the LDP is sound and meets procedural requirements.</p>	
<p><i>Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid.</i></p> <p>I think the LDP is unsound and should be changed.</p>	✓
<p><i>Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.</i></p> <p>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 <u>newydd</u>?</b></p> <p><i>Ticiwch <u>bob un</u> 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>	
<p><i>Dyraniad safle newydd</i></p> <p>New site allocation</p>	✓



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 Whitland Creamery, Whitland (Area A)	
Cyfeiriad y cais Site reference	CA0446	
<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.</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>		
<p><b>5. Rhestrwch eich sylwadau isod.</b></p> <p>Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sydd eu hangen i gefnogi/cyflawnhau 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</p>		



ymgyngoriadau 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.

The following documents are attached:

Deposit Revised LDP Representation Supporting Document (21 March 2020)

Proposed candidate site Questionnaire.

*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.	
<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><b>7. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed.</b></p> <p><b>7. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.</b></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> <p>I wish to be heard in English.</p>	✓



## 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/broffion 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 hystyried, cyhyd â'i fod yn perthyn i'r*

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



*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.*

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.