

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 dudalennau ychwanegol lle bod angen.

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

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

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

Dychwelwch ffurflenni at:

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

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

This form should be used for all representations (i.e. comments or objections). Electronic versions and guidance notes are available at www.carmarthenshire.gov.wales. 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.

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

Kedrick Davies

Teitl swydd (lle y bo'n berthnasol)
Job title (where relevant)*Sefydliad (lle y bo'n berthnasol)*
Organisation (where relevant)*Cyfeiriad*
AddressPyllaucoediog, Taliaris,
Llandeilo, SA19 7NF*Rhif ffôn*
Telephone noE-bost
Email address*Llofnodwyd*
Signed*Dyddiad*
Date

9th March 2023

RHAN B: Eich sylw**PART B: Your representation***Eich enw / sefydliad*
Your name / organisation**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*Betws/Ammanford
Development Limits

LDP policy or site allocation number(s)	
<i>Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran</i> LDP paragraph or section number(s)	SD3, SD1 Development Limits 11.75 and associated proposals map for the area
<i>Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol</i> LDP Proposals Map reference(s)	Development Limits for Ammanford/Betws
<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.	NO
<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.	
<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.	
<p>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff <u>newydd</u>?</p> <p><i>Ticiwch <u>bob un</u> sy'n berthnasol.</i></p>	

3. Would you like the LDP to include a new policy, site allocation or paragraph?

Tick all that apply.

Dyraniad safle newydd

New site allocation

Polisi newydd

New policy

Paragraff neu destun ategol newydd

New paragraph or supporting text

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).

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).

Enw'r safle

Site name

Land adjacent Colonel Road/Waungron Road Betws, Ammanford

Cyfeiriad y cais

Site reference

Land area to form part of the Development Limits for Betws/Ammanford so as to facilitate development of no more than two dwellings

Os ydych am awgrymu safle newydd, dylech atodi cynllun o'r safle yn nodi ffiniau'r safle rydych am eu cynnwys yn y Cynllun a rhoi manylion am ei ddefnydd arfaethedig. Dylech ystyried a oes angen i'r ffurflen sylwadau hon gael ei hategu gan arfarniad o gynaliadwyedd. Lle bo gan newidiadau arfaethedig i Gynllun Datblygu effeithiau cynaliadwyedd sylweddol, bydd angen i chi ddarparu'r wybodaeth berthnasol ar gyfer arfarnu cynaliadwyedd. Mae'n rhaid i'r wybodaeth hon fod yn gyson â chwmpas a lefel manylder yr arfarniad o gynaliadwyedd a gynhaliwyd gan yr Awdurdod. Dylai hefyd gyfeirio at yr un wybodaeth waelodlin wrth amlygu effeithiau sylweddol tebygol y polisi arfaethedig neu safle newydd.

If you want to suggest a new site, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. You should consider whether it is necessary for this comments form to be accompanied by a sustainability appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

5. Rhestrwch eich sylwadau isod.

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

The land has been identified as forming part of the settlement of Betws, Ammanford for in excess of 30+ years and there has been no material change in terms of its relationship to the settlement.

The land is currently within the development limits and allocated for housing (GA3/h15) in the current LDP with the number of units based on an approved planning application for 6 dwellings which was extant at that time. It has been subject to a number of planning applications, E/25557, E30908 etc plus the most recent E/37271. The latter one was subject to a non-determination appeal (App/M6825/A/19/3236012). A considerable amount of time and funds has been spent looking at ecological and arboricultural matters in order to devise an acceptable solution for the allocated site. A scheme was drafted which was not dissimilar to a previous permission but that application (E/37271) became subject to a non-determination appeal that was eventually dismissed by the Inspector (see attached appeal decision). In terms of the trees and ecological matters the Inspector concluded that these did not preclude the development of part of the site subject to a revised approach. Since the appeal decision we have appointed a new architect to consider the site and housing design for a smaller number of units (2 dwellings) with a "softer touch" approach with minimal ground reconfiguration. That application will be submitted shortly given the principle of development would be in accord with the current LDP. Details of the new revised scheme will be provided to the LDP Inspector shortly.

Accompanying this submission we have included the Inspector's appeal decision and copies of the Ecological and arboricultural reports upon which the Inspector reached his appeal decision on application E/37271.

Having spent so much time and funds on this scheme it was disappointing to see that the replacement Draft LDP has removed the land from the development limits. At the candidate site stage the LPA indicated in the Initial Assessment that "The location of the site relates to a settlement identified as a principal centre within the Preferred Strategy. Specific consideration will be given to its inclusion or otherwise as part of the preparation of the Deposit LDP."

As a consequence I wrote to the LPA seeking a detailed and specific explanation of why the land is being removed from the development limits given there has been no material change in circumstances?

In response the LPA replied as following;

"The site has been assessed in accordance with the Site Assessment Methodology and it was considered that there are sufficient and more suitable sites available to meet the housing needs of the area. This is due to the site's characteristics, namely its sloping topography, the fact that it is densely vegetated and that development on the site could negatively impact upon trees subject to Tree Preservation Orders.

As you are aware, the Deposit LDP is now subject to consultation and so this would be the opportunity for you to object to the site's exclusion. This can be done through our website.

I should also point out that the current LDP remains to be the Local Authority's adopted plan until the Revised LDP is adopted and supersedes it; this is anticipated to take place next year. In the meantime, you could submit an application for an appropriate scheme for the site and this would be measured against the provision of the current adopted plan."

In response I would state that within the community of Betws/Ammanford there are very few opportunities for residents to develop a bespoke self-build house to meet their family needs. Historically, Betws has been a popular location for self build properties and with land being available there is no reason to assume that will not continue to be the case. The inclusion of this area within the development limits for such a modest proposal does not undermine the strategic aims of the Revised LDP but does provide some much needed choice within an area that has been acknowledged as falling within the development limits for many years.

It is acknowledged that it would no longer be appropriate to consider the site as a housing allocation site as the approach being taken to respond to the site and have full regard to the planning appeal Inspectors view will reduce the

number of units to two dwellings. In terms of the protected trees and ecological matters the planning appeal Inspector concluded that these did not preclude the development of part of the site subject to a revised design approach. For the LPA therefore, to object to part of this land being developed on such grounds cannot be supported by the evidence. Within Wales the topography does inevitably mean that some development will take place on sloping sites but that is indeed often a key characteristic of development in the Principality and is not a legitimate reason to resist development.

It should also be noted that in terms of a sustainable location the land is ideally placed given the locality as identified in the accompanying sustainability report. Furthermore, the planning appeal Inspector made reference to section 3 and 5 of the Well Being of Future Generations (Wales) Act 2015 and acknowledged the well-being benefits of development in this area through the provision of new housing with good access to footpaths and the countryside. Those well-being attributes enhanced by the proximity of public transport services.

In the light of my submission I respectfully request that consideration be given to the continued inclusion of the land within the development limits for Betws/Ammanford.

<p><i>Ticiwch yma os ydych chi'n cyflwyno deunydd ychwanegol i gefnogi eich sylw.</i></p> <p>Tick here if you are submitting additional material to support your representation.</p>	<p>YES</p>
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6. Os ydych yn gwrthwynebu'r Cynllun Datblygu Lleol, ydych am siarad mewn sesiwn gwrandawriad yr Archwiliad cyhoeddus?

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

sesiwn gwrandawriad. Sylwer hefyd y bydd yr Arolygydd yn pennu'r weithdrefn fwyaf priodol ar gyfer darparu ar gyfer y rhain sydd eisiau rhoi tystiolaeth lafar.

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

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

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

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

Rwyf am siarad mewn sesiwn gwrandawriad.

I want to speak at a public hearing.

YES

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

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

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

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

Rwy'n dymuno cael fy nghlywed yn Gymraeg.

I wish to be heard in Welsh.

Rwy'n dymuno cael fy nghlywed yn Saesneg.

I wish to be heard in English.

YES

Nodiadau cyfarwyddyd

Guidance notes

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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