

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

Patricia Eagle

Teitl swydd (lle y bo'n berthnasol)
Job title (where relevant)**Sefydliad (lle y bo'n berthnasol)**
Organisation (where relevant)**Cyfeiriad**
Address**Rhif ffôn**
Telephone no**E-bost**
Email address**Llofnodwyd**
Signed**Dyddiad**
Date

12/04/2023

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

Patricia Eagle (neighbouring resident)

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**

HOM1: Housing Allocations - Cluster 5; site ref: SeC/h1

LDP policy or site allocation number(s)	"Llandeilo Northern Quarter"
<i>Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran</i> LDP paragraph or section number(s)	HOM1: Housing Allocations
<i>Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol</i> LDP Proposals Map reference(s)	SEC/h1
<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.	
2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod p'un a gredwch fod y Cynllun yn gadarn ai peidio, ac a yw'n bodloni'r gofynion gweithdrefnol. <i>I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.</i> 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. <i>For more information on soundness and procedural requirements, see the guidance notes.</i>	
<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.	
<i>Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.</i> I think that the procedural requirements have not been met.	In relation to SeC16/h1, the Cluster 5 assessment notes (in "additional comments"

	below box 29) that the proposal has already been changed, and indicates that "additional information will be sought as the LDP goes towards examination". This effectively means that no public consultation will be possible on that further information (as part of LDP deposit process) or on any further changes to the proposal.
3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff newydd? <u>newydd?</u> Ticiwch <u>bob un</u> sy'n berthnasol. 3. Would you like the LDP to include a <u>new</u> policy, site allocation or paragraph? Tick <u>all</u> 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

Cyfeiriad y cais
Site reference

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/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.

The proposal is potentially neither "acceptable" nor "deliverable" in terms of its impacts on neighbouring existing developments and, in particular, local highways.

1) Question 10 in the Site Allocation Assessment for Sec16/h1 asserts that the site is "accessible from the existing public highway". This is true, but only in a very narrow sense that the site can be accessed by an existing road. It says nothing of the nature and character of that single road access - Parc Pencrug.

Parc Pencrug is a narrow and twisting cul-de-sac that currently serves around 50 homes. It cannot be widened, owing to the proximity of existing buildings and the topology of the hillside. Access onto Parc Pencrug is via a tight-radius roundabout on Llys Pencrug; any attempt to re-work that junction would necessitate the loss of mature trees with significant amenity value, and would be to the detriment of the existing character of the Pencrug development.

Furthermore, Parc Pencrug is steep with a gradient of around 15% over a 100m length. There have been several incidents since the existing development was completed of vehicles skidding and losing control on this gradient, causing damage to both buildings and parked cars.

The current proposed development site - SeC16/h1 - would add around 50% to the number of homes served by Parc Pencrug. On this basis, it can be estimated that there would also be a 50% increase in traffic volumes on the road once any development is completed. It is far from clear that the road as currently configured could handle this increase. And given the intrinsic nature of the constraints on the road - existing buildings and site topology - this factor cannot safely be set aside now as something to be considered later as part of specific development proposals at the planning application stage.

The highways impacts of the construction phase of any development need also to be considered at this stage. Not only would this phase involve the direct construction of housing, but the Site Assessment also indicates that there would be a need for significant upgrades to the water and sewerage networks (see "Additional Comments" under Q26). It is clear that Parc Pencrug is not suitable for any significant volume of construction traffic.

2) These comments address the direct proposal (Sec16/h1) contained in the draft Second Deposit Plan. But in reality that proposal cannot be meaningfully considered in isolation from the planning history of the wider area and further proposals that might (re)emerge in the future.

The current proposal site was subsumed within a much larger site (T2/2/h1) in the First Deposit Plan, which would have involved nearly ten times the number of new homes. This earlier plan is still recognised in the Site Assessment for the current reduced proposal both in terms of its name - "Llandeilo Northern Quarter" - and in an explicit reference to Supplementary Planning Guidance for the wider

development adopted in 2009. This strongly indicates that the current proposal cannot be considered in isolation - in effect, as a windfall addition to the existing Pencrug neighbourhood - but has to be treated as a first phase of a much wider plan (potentially to be brought forward either outside the allocations in the current LDP or in a future LDP).

These potential future plans may appear to be outwith the scope of any assessment of the 2nd Deposit Plan that is the immediate subject of the current consultation/examination. But the continued existence of the wider-site SPG gives the lie to this, not least because any planning application for the "narrow" site would still have to reflect that wider-site SPG.

Significantly, the 2009 SPG presented as a supposed "benefit" from the development that it would improve the "legibility and permeability" of the highways network specifically by removing cul-de-sacs. The indicative site layouts identified a connection from a new junction at Rhosmaen Street, along the "main street" grade road through the new development, and then onto Parc Pencrug (and thence to Carmarthen Road). This would - as a matter of deliberate policy - lead to a massive increase in traffic flows along Parc Pencrug, both from traffic generated by the development itself and from wider cut-through access.

For the reasons discussed above in terms of potential impacts from the current "narrow" development, this much larger increase in traffic would clearly be inappropriate in terms of its impacts on neighbouring developments.

The 2009 SPG makes passing reference to the role of pinch-points and design details to reduce the impact of rat-running. But even if these are effective in terms of reducing vehicle speeds, they would in practice do nothing to reduce traffic volumes.

Forward-thinking local authorities across the UK are increasingly looking to remove through-connections in residential areas - at the top-end through Low Traffic Neighbourhoods and on a simpler scale through the closing off of individual roads with impermeable gates and barriers. It would be sadly ironic if Carmarthenshire chose to head in the opposite direction of opening residential neighbourhoods up to new through-traffic, where they are currently self-contained.

On these bases, the proposal for site SeC16/h1 cannot be considered divorced from its history, and can be appropriate only if the existing 2009 SPG for the wider site is formally revoked and rescinded by Carmarthenshire County Council.

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

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

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

Ar y cam hwn, gallwch wneud sylwadau'n ysgrifenedig yn unig (gelwir y rhain yn

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

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

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

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

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



Rwyf am siarad mewn sesiwn gwrandawriad.

I want to speak at a public hearing.

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

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

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

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

Rwy'n dymuno cael fy nghlywed yn Gymraeg.

I wish to be heard in Welsh.

Rwy'n dymuno cael fy nghlywed yn Saesneg.

I wish to be heard in English.

Nodiadau cyfarwyddyd

Guidance notes

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

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

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

Darperir rhagor o wybodaeth am y profion 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

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.