

**Ffurflen Sylwadau Newidiadau a gynigir yn sgil Materion a Godwyd
Cynllun Datblygu Lleol Diwygiedig Sir Gaerfyrddin 2018–2033**
Carmarthenshire Revised Local Development Plan 2018 – 2033
Matters Arising Changes Representation Form

Hoffem gael eich barn ar Newidiadau a gynygir yn sgil Materion a Godwyd Cynllun Datblygu Lleol Diwygiedig Sir Gaerfyrddin 2018–2033, ac ar y dogfennau sy'n cefnogi'r Cynllun (Atodiad yr ARC a'r ACI).

Dylid defnyddio'r ffurflen hon ar gyfer pob sylw (h.y. cefnogiad neu wrthwynebiadau). Mae fersiynau electronig a nodiadau canllaw ar gael yn www.carmarthenshire.gov.wales. Os ydych yn cyflwyno copi papur, atodwch daflenni ychwanegol yn ôl yr angen.

Dylid cyflwyno unrhyw sylwadau fel rhan o'r ymgynghoriad ar Newidiadau Materion a Godwyd Cynllun Datblygu Lleol Diwygiedig Sir Gaerfyrddin 2018–2033. Dim ond sylwadau a gyflwynir yn briodol fydd yn cael eu cyflwyno i'w harchwilio a'u hystyried fel rhan o'r broses Archwilio.

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 Pendyrfyniadau Cynllunio ac Amgylchedd Cymru (PCAC).

Mae'n rhaid derbyn eich sylwadau erbyn 11:59yh ar y 26 o Fehefin 2026.

Dychwelwch ffurflenni at: Rheolwr Polisi Strategol a Chreu Lleoedd, Lle a Chynaliadwyedd, Adran Lle, Seilwaith a

We would like your views on the **Matters Arising Changes Carmarthenshire Revised Local Development Plan 2018–2033**, and also on documents which support the Plan (HRA & ISA Addendum).

This form should be used for all representations (i.e. support 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 should be made as part of the consultation on the **Matters Arising Changes Carmarthenshire Revised Local Development Plan 2018–2033**. Only duly made representations will be submitted for examination and considered as part of the Examination process.

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 Planning and Environment Decisions Wales (PEDW).

Your representations must be received by 11.59pm on the 26th of June 2026.

Please return forms to: Strategic Policy and Placemaking Manager, Place and Sustainability, Department of Place

Datblygu Economaidd, Neuadd Y Sir,
Caerfyrddin, SA31 1JP.

Infrastructure and Economic Development,
County Hall, Carmarthen, SA31 1JP.

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

Mr C Jones

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

Director

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

JCR Planning Ltd.

Cyfeiriad
Address

Unit 3 Cross Hands
Business Workshops,
Heol Parc Mawr,
Cross Hands,
Llanelli,
Carmarthenshire,
SA14 6RE.

Rhif ffôn
Telephone no

E-bost
Email address

Llofnodwyd
Signed

Dyddiad
Date

25th June 2026

RHAN B: Eich sylw

PART B: Your representation

Eich enw / sefydliad
Your name / organisation

JCR Planning Ltd.

1. Ar ba Newidiadau a gynygir yn sgil Materion a Godwyd (neu ddogfennau ategol) rydych yn rhoi sylwadau?

1. Which Matters Arising Changes (or supporting documents) are you commenting on?	
Rhif(au) MAC MAC number(s)	
Cyfeiriad(au) Map MAC Map MAC reference(s)	
Os yw eich sylw yn perthyn i ddogfen ategol (yr ARC neu ACI), rhowch enw'r ddogfen a chyfeirnod(au) yr adran a/neu rif y paragraff yma. If your representation relates to a supporting document (HRA or ISA) 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>	
Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol. I think the LDP is sound and meets procedural requirements.	
Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid. I think the LDP is unsound and should be changed.	X
Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni. I think that the procedural requirements have not been met.	
3. Rhestrwch eich sylwadau isod. <i>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.</i> 3. 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.

This representation comprises a generic objection to the MACs and HRA and calls for the progression of the Revised Carmarthenshire Local Development Plan (LDP) 2018 – 2033 to be paused.

It is submitted that the plan cannot currently meet the statutory 'tests of soundness', specifically regarding Test 2 (Appropriateness) and Test 3 (Deliverability), until the outstanding Habitats Regulations Assessment (HRA) issues concerning Special Areas of Conservation (SAC) nutrient failures are fully resolved, with absolute legal and scientific certainty.

Proceeding with the LDP under the current climate of regulatory uncertainty, potentially means the adoption of a fundamentally flawed and legally vulnerable document. The current trajectory of the LDP will result in significant land use vulnerabilities and considerable economic risk.

Under Regulation 63 of the *Conservation of Habitats and Species Regulations 2017*, the Council, and by extension PEDW during examination, must act as the "competent authority." The law mandates that a land use plan can only be given effect if it has been established that it will not adversely affect the integrity of a European site, either alone or in combination with other plans or projects.

This representation is made within the context of:-

- i) the Precautionary Principle: The European Court of Justice (ECJ) case law dictates that an appropriate assessment cannot rely on speculative, future, or unproven mitigation measures.
- ii) the Carmarthenshire Context: Significant portions of the LDP's growth allocations fall within the nitrate affected river catchments.

As the strategic framework to definitively offset these nutrients is not yet fully operational, the HRA accompanying this LDP cannot eliminate reasonable scientific doubt. Therefore, the plan fails the fundamental legal threshold required by the Habitats Regulations.

An HRA must account for in-combination effects - allocating thousands of new homes and commercial sites while river systems are failing their nutrient targets, and while marine catchments face strict requirements for nitrate neutrality, creates an irreconcilable statutory conflict.

Advancing a plan that relies on 'speculative' or as yet unproven mitigation strategies, fails the precautionary principle enshrined in environmental law and leaves the LDP highly vulnerable to successful judicial review.

At the recent 'LDP2 Exploratory Meeting' convened by Pembrokeshire County Council, evidence was presented which suggested that a policy framework for dealing with nitrates would be available by the spring of 2027. For the sake of a few months, would it not be prudent to await this framework, in order to obtain a full and complete understanding of the expected costs for each affected housing site, which will have implications for affordable housing provision viability, etc.?

To be declared "sound", an LDP must be realistic and deliverable. Currently, a significant portion of the proposed housing sites are in the south of the county and are impeded by nutrient-sensitive river catchments.

The LDP therefore fails on the following tests of soundness. The LDP cannot be deemed 'appropriate' if many of its core housing and employment allocations conflict directly with statutory environmental duties. By allocating growth in areas where wastewater treatment works lack the capacity or mechanism to strip nutrients to permissible levels, there is a considerable risk of further ecological degradation of protected waters.

In terms of 'deliverability' and to be deemed 'sound', the LDP must be realistic and deliverable over the plan period. The '*nutrient budget calculator*' is a tool that merely quantifies the problem - it does not provide a universal panacea. In the absence of functional, catchment-wide strategic mitigation, such as integrated wetlands or sewerage infrastructure upgrades, subsequent residential planning applications, within these affected catchments will likely fail the 'Appropriate Assessment' stage. Transferring these unresolved issues to developers at the planning application stage will completely stall delivery, rendering the LDP's housing strategy undeliverable.

A procedural pause is considered necessary, at least until the Welsh Government working group(s) has published its findings. A failure to temporarily pause matters may result in post-adoption legal challenge and would exacerbate market uncertainty. It is important to ensure that the Welsh Government working group findings are properly integrated with the LDP's infrastructure delivery plan.

In conclusion, the Inspectors are respectfully requested to exercise their procedural authority to pause the LDP process until a definitive, strategic mitigation mechanism can be implemented and a revised HRA, compatible with achieving nutrient neutrality/reduction across the affected SAC catchment, is in place.

Progressing the LDP while nitrate SAC issues remain unresolved is a high-risk option that impacts legal soundness and ecological responsibility.

The fundamental development plan principle of providing informed guidance and certainty for developers will regrettably be significantly undermined.

<i>Ticiwch yma os ydych chi'n cyflwyno deunydd ychwanegol i gefnogi eich sylw.</i> Tick here if you are submitting additional material to support your representation.	

4. Ymddangosiad mewn unrhyw Sesiynau Gwrando yn y dyfodol <i>Mater i'r Arolygwyr yw penderfynu a oes angen cynnal Sesiwn Wrando yn y dyfodol o ganlyniad i ystyried sylwadau ar y Newidiadau sy'n Codi. Dim ond y personau sy'n cyflwyno gwrthwynebiadau fydd â'r hawl i fynychu unrhyw Sesiynau Gwrando pellach</i> 4. Appearance at any future Hearing Sessions It is for the Inspectors to determine whether a future Hearing Session is necessary as a result of the consideration of representations on the Matters Arising Changes. Only those persons making objections will have the right to attend any further Hearing Sessions	
<i>Nid wyf am siarad mewn gwrandawladau cyhoeddus posibl yn y dyfodol ac rwy'n fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygwyr</i> I do not want to speak at potential future public hearings and am happy for my written representations to be considered by the Inspectors.	

<i>Rwyf am siarad mewn gwrandawiadau cyhoeddus posibl yn y dyfodol.</i> I want to speak at potential future public hearings.	X
5. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed. 5. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.	
<i>Rwy'n dymuno cael fy nghlywed yn Gymraeg.</i> I wish to be heard in Welsh.	
<i>Rwy'n dymuno cael fy nghlywed yn Saesneg.</i> I wish to be heard in English.	X

Nodiadau cyfarwyddyd

Guidance notes

Mae Cynllun Datblygu Lleol Sir Gaerfyrddin yn cael 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'.

The Carmarthenshire Revised Local Development Plan (LDP) is being 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'.

Fydd methu adnabod prawf ddim yn golygu na chaiff eich sylwadau eu hystyried, cyhyd â'i fod yn perthyn i'r MAC's neu'r dogfennau atodol. Dylech gynnwys eich holl sylwadau ar y ffurflen, gan ddefnyddio dogfennau ychwanegol a thystiolaeth ategol lle bod angen.

Os ydych yn gwrthwyneubu am fwy nag un MAC, nid yw bob tro yn angenrheidiol i lenwi ffurflenni ar wahân ar gyfer pob darn o'ch sylw.

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.

Failing to identify a test will not mean that your comments will not be considered, providing it relates to the MAC's or the supporting documents. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.

If you want to object to more than one MAC, it is not always necessary to complete separate forms for each part of your representation.

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.