

**At sylw:** Ian R Llewelyn

Rheolwr Polisi Strategol a Chreu Lleoedd

**Mae MAP yn diolch am y cyfle i ymateb i'r ddogfen ddiwygiedig ac yn cyflwyno'r sylwadau canlynol sy'n ymwneud â safle Clwstwr 1 – SuV20/h1 - y tir ger Llwyn Henri, Porth-y-rhyd.**

Sylweddolwn mai un o'r gofynion wrth fynd ati i lunio CDLl yw gofalu bod pob pentref yn derbyn ei gwota o dai.

Sylweddolwn hefyd mai tasg digon heriol yw dod o hyd i safleoedd addas ym Mhorth-y-rhyd gan bod y pentref ar orlifdir a phrif beipen Brianne-Felindre yn croesi'r caeau.

Mae safle SuV20/h1 wedi'i addasu a'i wrthod sawl gwaith dros y blynyddoedd ac erbyn hyn mae'n llawer llai o faint (0.512 hectar) ac argymhellir adeiladu 6 o anheddau yno. Argymhellir yn yr asesiad hefyd y bydd angen ystyried dyluniad y cynllun o ystyried ei leoliad fel na fyddai dyrannu rhan o'r safle ymgeisio yn cael effaith andwyol ar yr ardaloedd cyfagos.

Oblegid iddo gael ei docio, nid yw'r tir a ddyrannwyd ar gyfer datblygiad preswyl o fewn Parth Llifogydd. Bu pryder hefyd oherwydd bod prif beipen ddŵr Brianne-Felindre yn tramwyo'n agos at y safle ond cadarnhaodd DC y bydd clustogfa i warchod y beipen honno.

Dan amgylchiadau arferol felly, ni fyddai gwrthwynebiad.

Dyma ddatblygiad rhesymol ei faint ac addas i bentref – yn wir, yr union fath o ddatblygiad y dadleuodd MAP sydd ei angen i gadw pentrefi bach yn fyw

OND yn anffodus, yn sgil datblygiadau diweddar, rhaid edrych ar y pictiwr ehangach ac ystyried dau beth:

1. Y cynnydd syfrdanol o ran y cyflenwad tai ym Mhorth-y-rhyd
2. A'r honiad bod pentref Porth-y-rhyd eisoes wedi derbyn ei gwota.

### **1.Cynnydd yn nifer y tai ym Mhorth-y-rhyd**

Fel y gwyddoch yn Ebrill 2023 penderfynodd yr Adain Flaen-gynllunio ddad-ddyrannu safle Wernfraith. Y rheswm a roddwyd oedd bod ***'pryderon parthed danfonadwyedd y safle'*** ac felly ***'bod ansicrwydd ynghylch ei gyflaweni yn ddigon i beidio a'i gynnwys.'***

*(Gw: Tud 47 Tabl Asesiadau Safleoedd Llywodraeth Cymru)*

Roedd hyn yn newyddion i'w groesawu oherwydd gwrthwynebiad cryf y gymuned, problemau seilwaith yn y pentref ac anaddasrwydd y safle hwnnw.

Flwyddyn yn ddiweddarach, ar Ebrill 25ain 2024, rhoddodd aelodau Pwyllgor Cynllunio Sir Gaerfyrddin ganiatâd i godi 42 o anheddau ar y safle hwnnw.

Mae'n anodd i'r trigolion ddeall rhesymeg yr hyn a ddigwyddodd:

- ar y naill law yr Adain Flaen-gynllunio'n dad-ddyrannu'r safle am '*resymau dilys*'
- ac ar y llaw arall Brif Swyddog Datblygu'r Sir yn arwain aelodau'r Pwyllgor Cynllunio i gymeradwyo cais i godi 42 o dai ar yr union safle a ddad-ddyrannwyd.

Anodd derbyn hefyd y cynnydd yn nifer y tai – o'r 27 annedd a argymhellwyd yn y Gwrandawriad yn Ebrill 2014 i 42 o dai.

Yn 2014 tybiai swyddogion cynllunio a'r arolygydd annibynnol bod 27 yn ormod a chytunwyd i argymhell graddoli :

*'One of the main considerations of this site would be in regard to the size of the development in relation to the settlement... the new site area would have an indicative number of 27 dwellings. By reducing the numbers within the site and utilising the phasing policy, which is provided within the LDP, the 27 dwellings would be phased over a number of years, lessening any impact on the village in terms of appearance and to the Welsh language which is widely spoken within the village.'* (Gwrandawriad 7 Ebrill 2014)

OND yn 2024, ni roddwyd ystyriaeth o gwbl i'r ardrawiad posib ar yr iaith Gymraeg ac ni chrybwyllwyd graddoli nac unrhyw fesur lliniaru arall, er bod cynnydd o 55% yn nifer y tai.

D.S Wrth hyrwyddo'r safle yn *Adran y Sylwadau Ychwanegol* dywedir mai ***'hwn yw un o'r ychydig gyfleoedd ym Mhorth-y-rhyd ar gyfer datblygiad newydd, yn enwedig o ystyried bod y dyraniad presennol wedi cael ei ddad-ddyrannu.'***

***'This site is one of few opportunities in Porth-y-rhyd for new development, particularly with the de-allocation of the existing LDP allocation.'***

Mae'n amlwg mai Wernfraith yw'r safle y cyfeirir ato, felly, mae'r gosodiad yn gamarweiniol. Nid yw'n cyfleu'r gwir sefyllfa oherwydd awgryma'r term '*dad-ddyrannu*' NA fydd y tir yn cael ei ddatblygu, ac wele 42 o dai yn cael eu hadeiladu yno.

Unwaith y bydd y datblygiad hwn gan Gwmni Jones Henllan Cyf. yn orffenedig bydd:

19 tŷ rhent (yn cynnwys 4 fflat un-llofft)

10 tŷ fforddiadwy

13 tŷ preifat

Mae'r ffaith bod cynnydd sylweddol yn y stoc dai yn arwain at gwestiwn arall:

## **2. Tybed a yw Porth-y-rhyd wedi derbyn mwy na'i gwota o dai yn barod?**

Pan ddyrannwyd safle Wernfraith yn 2014 tynnodd yr ymgynghorydd cynllunio annibynnol sylw at y ffaith bod Porth-y-rhyd wedi derbyn mwy na'i siâr o dai. Er bod mwy o wasanaethau allweddol a chyfleusterau yn Llanddarog, Porth-y-rhyd – y lleiaf cynaliadwy o'r ddau bentref - a glustnodwyd i dderbyn y nifer fwyaf o anheddau.

|              |            |    |               |
|--------------|------------|----|---------------|
| PORTH-Y-RHYD | Wernfraith | 27 |               |
|              | Glenfryn.  | 9  | CYFANSWM - 36 |

|            |                           |    |                |
|------------|---------------------------|----|----------------|
| LLANDDAROG | Safle gyferbyn â'r neuadd | 16 |                |
|            | Is-y-llan                 | 6  | CVYFANSWM - 22 |

Gwelir bod Porth-y-rhyd wedi gorfod derbyn 77% yn fwy o anheddau na Llanddarog.

Dadleuodd hefyd bod y dyraniadau ar gyfer Porth-y-rhyd *'yn uwch na'r lefel i gwrdd â'r angen am dai.'*

Diddorol cymharu'r argymhellion ar gyfer y ddau bentref yn y CDLI diwygiedig (2018 – 2033).

|              |                                            |    |               |
|--------------|--------------------------------------------|----|---------------|
| LLANDDAROG   | SuV19/h2/h1 ( Haulfan)                     | 10 |               |
|              | * SuV19/h1 ( Safle dros ffordd i'r neuadd) | 16 | CYFANSWM - 26 |
| PORTH-Y-RHYD | SuV20/h1 ( Safle ger Llwyn Henri)          | 6  |               |
|              | + Wernfraith                               | 42 | CYFANSWM: 48  |

Unwaith eto gwelir y pentref lleiaf cynaliadwy yn derbyn dyraniad gwirioneddol uwch - 84% yn fwy.

Mae risg hefyd y gall y nifer o anheddau gynyddu ar safle SuV20/h1 gan mai nifer 'dangosol' yn unig yw'r 6.

A oes risg y bydd datblygwr yn hawlio cynnydd yn y nifer o anheddau gan ddadlau bod angen gwneud y defnydd gorau o'r tir?

MAC 057 AP2/9

*PSD 14 : Dwysedd Tai*

*'Ym mhob achos rhaid i ddatblygiadau tai wneud y defnydd mwyaf effeithlon o dir yn unol ag egwyddorion cynaliadwyedd a chreu lleoedd.'*

Gwelsom ddwysedd yn cynyddu'n sylweddol ac erbyn heddiw ystyrir 22- 25 uned yr hectar yn isel. Nid yw'n anarferol gweld dwysedd o 35 yr hectar ac mae sawl esiampl yn uwch eto gyda 36.6 uned yr hectar ar stad Parc y Gelli Foelgastell a 42 yr hectar yn Heol Bryn Bedw.

Er bod y safle hwn bellach yn llai na'r 0.75 hectar gwreiddiol (0.514h) ni fydd nifer yr anheddau yn cael ei benderfynu nes y cyflwynir cais cynllunio . Gall y cyfanswm uchod o 48 fod yn uwch eto.

O ganlyniad gofynnwn yn garedig i chwi ail edrych ar y sefyllfa stoc dai yn y pentref ac ystyried o ddifrif a yw Porth-y-rhyd eisoes wedi derbyn ei gwota.

Pentref ar orlifdir yw Porth-y-rhyd a chyfeiriwyd sawl gwaith yn y gorffennol at y problemau sy'n bodoli oherwydd llifogydd, dŵr ffo a system garthffosiaeth ddiffygiol.

Deallwn *'nad yw DC WW wedi gwneud unrhyw sylwadau anffafriol mewn perthynas â'r dyraniad tai arfaethedig'* ac na fydd angen gwneud hynny nes bydd cais cynllunio gerbron ond fel y gwyddoch o'r dystiolaeth a gyflwynwyd i'r adran gynllunio dros y blynyddoedd mae problemau llifogydd a phroblemau yn sgil system garthffosiaeth sy'n gwegian. Erbyn hyn mae problemau wedi amlygu yn Llanddarog hefyd a'r unig ffordd mae'r system yn ymdopi yw bod gwastraff heb ei drin yn cael ei ollwng i'r Gwendraeth Fach a bod tanceri yn gwagu'r system bob tro mae cawodydd trwm o law. O'r diwedd mae DC a'r Cyngor Sir wedi trafod y posibilïad o gydweithio i geisio datrys rhai o'r problemau hyn ond y gwir yw bod angen buddsoddiad

sylweddol i uwchraddio'r system bresennol. Ym marn y trigolion dylid datrys y problemau cyn caniatáu rhagor o anheddau.

### I gloi:

Er mor resymol yw'r argymhellion y tro hwn parthed safle SuV20/h1, gofynnwn yn garedig i chwi ystyried y canlynol os gwelwch yn dda:

- Yn sgil y newid dramatig yn y ddarparieth dai yma ym Mhorth-y-rhyd, a gytunwch bod angen ail edrych ar yr angen am gartrefi yn y pentref?
- Oes tystiolaeth ddigonol bod gwir angen datblygu rhagor o safleoedd yn y pentref i gwrdd â'r galw yn lleol gan bod 42 o gartrefi yn cael eu hadeiladu ar safle Wernfraith?
- Pam bod y pentref lleiaf cynaliadwy unwaith eto'n cael cwota uwch?
- Onid yw'r pentref bellach wedi derbyn ei gwota?
- A ydych chi'n cytuno y dylid datrys y problemau sy'n bodoli gyda llifogydd a'r isadeiledd cyn caniatáu rhagor o ddatblygu yn y pentref?

Diolch yn fawr,

Grŵp Llywio MAP

F.A.O : Ian R Llewelyn  
Strategic Policy and Placemaking Manager

**MAP is responding to Cluster 1 proposed allocation - SuV20/h1 – land adjacent to Llwyn Henri, Porth-y-rhyd.**

Residents appreciate that Forward Planning, when drawing up the LDP, expects all villages to accept their quotas.

Residents also appreciate just how challenging a task it is for Forward Planning officers to identify suitable sites for development in Porth-y-rhyd as the village lies within a Flood Zone and the Brianne-Felindre pipeline traverses the fields.

This proposed site has been ‘adapted and rejected’ several times over the years and is now a far smaller site of 0.514 hectares recommended for 6 dwellings. According to the Additional Comments in the Site assessment *‘consideration will be given to design of the scheme given its location, however the allocation of part of the site would not adversely impact the surrounding areas.’*

Excluding a portion of the land within the designated flood zone area and allowing a buffer zone to protect the Brianne-Felindre pipeline has overcome further obstacles.

Under normal circumstances, there would be no opposition.

The proposed allocation for a small development is a reasonable proposal – the kind of small - scale development that MAP has been advocating over the years to keep villages viable and alive.

HOWEVER, in light of recent developments, one needs to look at the wider picture and consider the following:

1. The dramatic increase in the housing stock in Porth-y-rhyd
2. The claim that Porth-y-rhyd has already exceeded its expected quota.

**1.The dramatic increase in the housing stock**

In April 2023, Forward Planning decided to de-allocate Wernfraith site. The reason given for the decision was that there was doubt as to its deliverability. (*See: Page 47 Site Assessment Table.*) This decision to de-allocate the Wernfraith site was welcomed by residents, who strongly opposed development there because of inadequate infrastructure, a failing sewerage system, and the site’s unsuitability.

MAP could not have anticipated that a planning decision with such far-reaching consequences would be made by Carmarthenshire County Council exactly a year later as on April 25<sup>th</sup> 2024, the Carmarthenshire Planning Committee granted an application for 42 dwellings to be built on the Wernfraith site – the exact same site that Forward Planning had turned down as an allocation in the revised LDP.

I'm sure one can appreciate just how difficult it is for the ordinary lay person to understand that:

- on the one hand Forward Planning de-allocated the site '*for sound reasons,*'
- whilst on the other hand the Carmarthenshire Chief Development Officer led the Planning Committee to approve an application for the development of 42 dwellings on that site

It was also disappointing to see such an increase in the number of dwellings permitted on the Wernfraith site - from the 27 dwellings recommended at the 2014 Hearing to 42 dwellings approved.

In 2014, planning officers and an independent inspector agreed to Phasing as it was felt that the indicative 27 dwellings was too high.

*'One of the main considerations of this site would be in regard to the size of the development in relation to the settlement... the new site area would have an indicative number of 27 dwellings. By reducing the numbers within the site and utilising the phasing policy, which is provided within the LDP, the 27 dwellings would be phased over a number of years, lessening any impact on the village in terms of appearance and to the Welsh language which is widely spoken within the village.'* (Hearing 7 April 2014)

In 2024, no consideration was given at all to the impact of the development (42 dwellings) on the Welsh language and there was no mention of Phasing or any other mitigating measure even though there was a further increase of 55% in the number of dwellings.

N.B.

When promoting the site adjacent to Llwyn Henri farm as an allocation for the revised LDP, Forward Planning states that ***'this is one of few opportunities in Porth-y-hyd for new development, particularly with the de-allocation of the existing LDP allocation.'***

As the site referred to is Wernfraith, this is a misleading statement. It does not give the true picture at all as the term '*de-allocated*' in this context implies that the site is no longer available for development - yet 42 dwellings are currently being built on that same site.

Once Jones Henllan Ltd. completes the development, the following 42 dwellings will be available for purchase or rental thus increasing the housing stock in the village.

19 social rented homes (including 4 one-bedroom flats)

10 affordable homes

13 market homes

The fact that there is a substantial increase in housing provision leads to the question:

## **2.Has the village of Porth-y-rhyd already reached / exceeded its quota?**

When Wernfraith site was allocated in 2014 an independent consultant argued that Porth-y-rhyd, the least sustainable settlement, had the greater number of proposed new residential dwellings (LDP 2008 – 2018), although it was the neighbouring settlement Llanddarog which had the greatest number of key services and facilities.

|              |                    |    |           |
|--------------|--------------------|----|-----------|
| PORTH-Y-RHYD | Wernfraith         | 27 | TOTAL: 36 |
|              | Glenfryn           | 9  |           |
| LLANDDAROG   | Site opposite hall | 16 | TOTAL: 22 |
|              | Is-y-Llan          | 6  |           |

Porth-y-rhyd was allocated 77% more dwellings than Llanddarog. The consultant also drew attention to the fact that *'the allocations for Porth-y-rhyd exceeded the settlement's level of housing need.'*

It's interesting to compare the allocations recommended for both villages in this revised LDP.

These are the recommendations for the revised LDP (2018-2033)

|              |                                         |    |            |
|--------------|-----------------------------------------|----|------------|
| LLANDDAROG   | SuV19/h2/h1 (Haulfan)                   | 10 | TOTAL: 26  |
|              | SuV19/h1 (site opposite village hall)   | 16 |            |
| PORTH-Y-RHYD | SuV20/h1 (site adjacent to Llwyn Henri) | 6  | TOTAL : 48 |
|              | Wernfraith site                         | 42 |            |

Again, the least sustainable of both settlements has a far higher allocation - 84% - a village where there are existing infrastructure issues and a village which lies within a flood plain.

There is also a risk that the indicative number of 6 dwellings recommended for SuV20/h1 will increase during the planning process.

Is there not a risk that the developer/s would argue the need for an increase in the number of dwellings to make best use of land?

MAC 057 AP2/9

PSD 14: Housing Density

*'In all cases housing developments must make the most efficient use of land in accordance with sustainable, placemaking principles.'*

Development densities have risen significantly: 25 units per hectare is now considered low, while densities of 35 per hectare are not unusual, with examples of 36.6 at Parc y Gelli, Foelgastell, and 42 at Heol Bryn Bedw.

Although the site area has been reduced from 0.75 ha to 0.52 ha, the final number of dwellings will not be confirmed until a developer submits a planning application and as a result the above total of 48 dwellings could increase.

We therefore, ask that you kindly look again at the current housing stock in the village and consider whether or not Porth-y-rhyd has already reached / exceeded its expected quota.

It has been widely documented, that as Porth-y-rhyd lies within a flood zone there are issues with flooding, surface water and the failing sewerage system.

We acknowledge that DCWW does not comment fully at this stage in the process and that

***‘DCWW has not provided any adverse comments relating to the proposed housing allocation’.*** However, as you will be aware, Porth-y-rhyd residents have submitted evidence to the planning authority over many years showing persistent flooding and sewerage problems. Similar issues have also arisen in Llanddarog, and during wet weather the existing system appears to cope only by discharging untreated sewage into the Gwendraeth Fach river and by using tankers to empty the system.

Finally, DCWW and the County Council are discussing possible joint action to address some of these issues, but there is no denying that the system clearly requires significant investment and upgrading. The residents are of the opinion that this should be done before approving further developments.

### **To conclude:**

Although the recommendation for site SuV20/h1 appears reasonable (6 dwellings), MAP kindly requests on behalf of the residents, that you consider the following questions:

- In view of the recent dramatic change in housing provision in Porth-y-rhyd would you agree that there is a need to look again at the settlement's level of housing need?
- Is there sufficient evidence to claim that there is a need for more dwellings when taking into consideration that 42 units will be provided on the Wernfraith site to meet the local need?
- Why is it that the least sustainable village once again has a higher quota of dwellings?
- Has not the village of Porth-y-rhyd already reached the expected quota?
- Would you agree that there are serious issues (flooding and infrastructure) that need to be resolved before further developments are approved?

Diolch yn fawr.

MAP Steering Group

