

- MAP is fully aware of the need for development to keep villages 'alive and viable' and create affordable homes and decent rental accommodation for local people. However, MAP is also committed to consider the impact of any proposed developments in Porth-y-rhyd and to ensure that any kind of development is in character with the village and is built on a site where there are no issues.
- Although MAP debates applications individually when they are submitted, it also looks at the broader picture and tries to determine the true impact all developments combined (if granted permission) would have on the village.
- MAP appreciates the challenge facing Forward Planning Officers to identify suitable sites for developments in order to reach targets set.
- MAP realises that Forward Planning has been given a brief to ensure that all villages are allocated a quota - a reasonable argument to be commended as it would avoid the danger of a massive 'carbuncle' of a development being forced on one village. In theory this is all well and good provided that there are suitable sites available. That unfortunately is not the case in Porth-y-rhyd – a village on the valley floor, within designated Flood Zones and with a pipeline traversing across it. It is, therefore, a far more challenging task.

These are the recommendations for Porth-y-rhyd:

- Change of boundary to include land near Tŷ Cynheidre for development.
- Site SuV20/h1 Land adjacent to Llwyn Henri
- Wernfraith Although this site has been de-allocated in the Revised LDP 2018 – 2033 it remains an allocated site in the current LDP 2006-2018. Our understanding is that when the Revised LDP will come into force Wernfraith will be classified as a Windfall Site.

Residents are of the opinion that this is the time to draw the attention of the Planning Authority to important issues and concerns. It was decided to compile a report on their behalf summarizing all concerns, comments and opinions expressed by the deadline of April 14th and hopefully have the opportunity to respond to specific details relating to SuV20/h1 and the change of boundary once information is available to the public.

MAP appreciates the opportunity to participate in this Consultation.

1. CHANGE OF BOUNDARY

It appears that a change of boundary is recommended to include a field below Tŷ Cynheidre. We understand that no information is available at this stage in the process as to the kind of development intended, the number of dwellings or the type of homes. It is therefore difficult to respond to this change in boundary without having all the relevant details. Perhaps a different type of building will be proposed – a farm building?

MAP's attention was drawn to the fact that another pipeline crosses this field.

This pipeline is wider than the usual water supply pipes. Is there a need to ensure a buffer zone on either side of the pipeline? If so, what measurements would that entail?

Will the fact that a pipeline crosses this field affect the Viability and Deliverability?

As there is no information available at this stage in the process to enable MAP to respond in a fair and professional way there is only one option open to us which is to **OPPOSE**.

2. Candidate Site SuV20/h1 Part of SR/139/002 & CA0894* Have not seen this reference before.

It is stated in the draft that there is no Relevant Planning History to this proposed site but the residents believe it is vitally important to look back on the planning history of this site.

2012

This field referred to as ALT/159/006/N was submitted at the Deposit LDP stage as one of seven alternative sites to be included in the Local Development Plan 2006 - 2018 (adopted in 2014). The site was 0.75 hectares with a proposed potential capacity for 15 units.

This was the conclusion reached at that time by an independent Planning Consultant:

In summary the site is linked but does not completely adjoin an existing cluster of development to the north of the core of the settlement. However, its development would represent the extension of this cluster further into the undeveloped adjoining open countryside. With no key services located at the cluster in question, this is not considered to be the most sustainable location for further development nor would it be in character with the general existing pattern of development of the village. In addition, the level of flood risk (which could be greater than perceived by the DAM) also seriously questions its deliverability.

See: Alternative Site Review Report for Llanddarog and Porth-y-rhyd May 2012.

The action group MAP acted on behalf of the residents presenting evidence on planning issues such as density, the change in character of the village, negative impact on neighbouring properties, problems with the then proposed entrance and increase in vehicles using the narrow winding old lane, strain on services, school had reached it's capacity, increase in commuting, loss of agricultural land, and loss of drainage field that would lead to more problems relating to surface water.

MAP's main concern was the fact that areas of the field were within flood zones B and C2 and that the main pipeline from Nantgaredig to Felindre skirted the site.

MAP still awaits an answer to a question asked in 2012:

What area needs to be kept clear of developments in order to create a buffer zone or corridor of protection?

Evidence was presented at the time including a Petition signed by over 300 residents (95% of the residents).

Site Assessment Methodology, Sustainability Appraisal / Strategic Environmental Assessment etc were carried out and following a robust and rational site selection process the boundary was drawn to exclude the site. At the Hearing it was confirmed by the LPA that alternative site ALT 159/006/N 'Land east of Llwyn Henry' is within a TAN 15 DAM Flood Zone as argued by MAP. Following the Hearing chaired by an Independent Planning Inspector the site was turned down.

- The site has been through the Site Assessment Methodology and the consideration of the site has been included within the Assessment of Site paper. It is considered that the site failed Phase 2b of that methodology for the following reasons:*

- *Development of the site would have a detrimental impact on the character and setting of the settlement or its features (including views and glimpses both into and out of the settlement.)*
- *In order for this development to take place, it would mean a considerable amount of new vehicular traffic on the minor road which leads to the site. Similar the Council's response during the UDP examination the carriageway would need to be widened to facilitate the development of the land for housing. As a result the land is both unnecessary and unsuitable for allocation.*

The upper field was also submitted for consideration as an alternative site in 2012 - ALT/159/007/N. The site size of 1.2 hectares had a potential capacity for 24+ units.

The Independent Planning Consultant stated: *'In summary, its development would extend the aforesaid cluster in a manner that would alter the current pattern of development and be of a scale that would represent an unsympathetic encroachment into the open countryside. In addition, clear access constraints question its deliverability.'*

Forward Planning Dept. proposed the site be refused based on numerous planning issues and that was also the decision of the Independent planning Inspector at the Hearing. (April 2014)
The Council confirmed that the site had been refused based on a robust and rational process.

2018 – SR/159/002

A new proposal was submitted in 2018 – 2019. The lower field (ALT/ 159/006/N now SuV20/h1) was combined with the upper field (ALT/159/007/N) to create one large site – the lower field of 0.7 hectares and the larger upper field of 1.1 h. The proposal was for 32 houses. Access would now be at the bottom of the lane, thus avoiding the use of existing narrow lane. It also meant that the number of dwellings would more than double.

See: Candidate Site Supporting Statement dated July 2018 (JCR)

There was overwhelming opposition to this proposal and relief when it was REFUSED.

2020

- The north-eastern upper field enclosure is no longer included. in the Revised Local Development Plan 2028 - 2033
- A portion of the lower south - western field that extends along the B4310 has also been excluded. Only part of the lower field is allocated for housing.
- Forward-Planning Dept. has identified 6 dwellings as being indicative for the site.
(Exact housing figures for the site will be determined when a detailed planning application is submitted).

The fact that the upper field has been excluded is welcomed as is the fact that there will be no building on the flood zone areas. A development of six dwellings also seems far more reasonable in a village the size of Porth-y-rhyd. We must stress that MAP is **not** opposed to developments but is concerned when developments are proposed on unsuitable sites where the impact will have a detrimental effect especially regarding surface water and sewerage problems.

However, as this is the exact same field that was categorically refused in 2014 following a Public Hearing and regarded as an unsuitable site for development, MAP objected.

2023 - SuV20/h1

It is impossible for MAP to respond as we would have wished to SuV20/h1 as no detailed information is available to date regarding the plan of the site, the proposed entrance, the type of

houses or the exact number of dwellings. It is confirmed that the site can accommodate 5 or more dwellings. What exactly does this mean? 6 / 10 / or more?

The Applicant has provided *'sufficient evidence to show that the development is deliverable and financially viable'* (See Point 28. Viability and Deliverability) and that was all the requirement at the current stage in the process. This document is not in the public domain.

It was agreed that MAP would compile a report summarizing the arguments and evidence of the residents and respond again to the detailed information available once that is in the public domain. .

1. Encroaching onto open land.

This proposed development would be encroaching onto open land. It is not a 'natural extension'. That was one of the main arguments in 2014 that led to it's refusal.

'Its development would represent the extension of this cluster further into the undeveloped adjoining open countryside'.

Report of the Planning Consultant in 2014 (JCR)

2. Loss of agricultural land

In the section dealing with Environmental Consideration it is stated in Point 20 that the site does not contain high quality agricultural land (Grade 1, 2 or 3a.) but the local residents fear that yet another agricultural field will disappear under concrete – a field that would be of agricultural value to future generations. There has been so much discussion since Brexit of the importance of farming and producing food locally. Should we not pause to consider which is the best option? To build on this field and lose a drainage field in the process or to preserve it for agricultural use for years to come and retain an important natural surface water drainage field?

3. Green areas

There is so much talk today about the importance of green areas to support people's physical and mental well-being. [Well-being of Future Generations \(Wales\) Act 2015](#) .

Should we not be protecting our green areas?

The Gwendraeth Valley was an industrial area and there is an abundance of brown-field sites within a short distance from this site which could accommodate the council's targets for housing. Why not concentrate on all these available areas before setting sights on the green fields? Not only is it unsustainable but it's unacceptable that agricultural land is sacrificed.

What about all those empty buildings and shops in Rhydaman, Llanelli and Caerfyrddin?

Surely there are more suitable options for development across Carmarthenshire as a whole.

4. Impact on neighbouring properties

This proposed development would have an impact on the neighbouring properties.

Policy GP1 / LDP stresses the importance that a development is compatible to its surroundings:

'the importance that developments are compatible with their surroundings in terms of scale, height, massing, and general topography of locality... must not adversely affect local amenity in terms of visual impact, loss of light and privacy, disturbance and traffic movement...'

This particular field is on a steep slope – the land rising suddenly from the level of the B4310 road below. What type of dwellings will be built there? Will they be bungalows or three storey houses?

Will the roofs of the new properties tower over existing properties?

- *Development of the site would have a detrimental impact on the character and setting of the settlement or its features (including views and glimpses both into and out of the settlement.) Forward Planning statement in 2014.*

Two bungalows are sited adjacent to the site. Those living there are presently able to enjoy the view of the open countryside. However, it would not only be a case of loss of vista, privacy and light. There is a possibility that the properties could devalue overnight once dwellings are built directly in front of them.

All other properties on the old lane are of a linear pattern.

5. Loss of drainage field

Not only will developing this field be a loss of agricultural land but also mean that yet another important drainage field will be lost. This would exacerbate existing serious problems with surface water in this part of the village.

All surface water flows from the developed area along the old lane and from surrounding area into this field. Very often large pools will appear on the field and once the field is saturated that surface water floods onto the B4310. Enclosed photos show this field after 4 hours of heavy rainfall on April 11th 2023.

The recommendation today is to refrain from developing not only sites within Flood Zones but land adjacent to Flood Zones.

The message is loud and clear. These fields are the important natural drainage areas and without them surface water problems will intensify.

We understand that a developer is expected to deal with surface water on site but from past experiences in this village that is definitely not the case!

6. Flood Zones

At the Public Hearing (HS19) in April 2014 the Independent Planning Inspector requested that the Planning Authority confirm whether or not this particular field was within designated Flood Zones as MAP argued.

LPA to confirm whether alternative site ALT/159/006/N 'Land east of Llwyn Henry Farm' is within a TAN 15 DAM Flood Zone. This was done.

The map in Appendix 3 indicates the TAN 15 DAM Flood Zone maps for ALT/159/006/N

The southern and western sections of the site lie within Zone B, with a part of the site within Zone C2.

Nothing has changed. The lower section of the field lies within designated Flood Zones B and C2. Although this portion of the field is not included in this revised site, MAP hopes that consideration will be given to the argument presented.

7. Pipeline

MAP is concerned about the proximity of this proposed allocation to the strategic main water pipeline from Nantgaredig Pumping Station to Felindre Water Treatment Works.

The Planning Consultant agreed back in 2014 that the pipeline 'skirts the site'.

MAP is aware that there should be a defined area of land on either side of the pipeline as a Buffer Zone or Corridor of Protection to protect the pipeline from damage.

Is it your opinion that the development of site SuV20/h1 would impinge on said Protection Corridor?

8. Proposed Entrance:

Minor adjustments have been made to try and overcome some of the hurdles faced last time e.g. a new entrance proposed. It is now suggested that an opening be created to access the proposed site from the initial section of the lane near the junction thus avoiding site vehicles utilising the narrow one-track lane which is 10 – 12 feet in places.

This plan may have solved the issue regarding said lane to some extent, however, proposing a new access at this location raises further concerns.

A different entrance definitely does not erase all the other serious issues.

This is not an ideal location for an entrance. The B4310 is a busy road especially twice daily during peak times and visibility in both directions is poor.

The road from Glenfryn/ Derwen Deg towards the village square is narrow and winding with a sharp bend to cross the bridge. As a terrace of properties to the right hand side of the road towards the A40 junction have no off road parking spaces or garages, there is no option but to park cars on the roadside.

It is important to be aware of other possible developments (as well as housing developments) that would have an impact on traffic in the future. Should funding become available SWTRA will review Phase 2 of the plan to close or adapt junctions between Crosshands and Caerfyrddin – the Foelgastell Junction in both directions and the Llanddarog Junction from the direction of Caerfyrddin - resulting in a massive increase in vehicles travelling through Porth-y-rhyd. All commuters from the neighbouring villages of Llanddarog, Llangyndeyrn, Cwm Mawr, Mynydd Cerrig, Foelgastell and Drefach will be using the B4310.

This is a quotation from a letter received from SWTRA.

'the closure of, or modifications to existing junctions will clearly result in traffic having to divert along minor roads and the implications of this needs to be fully taken into account.'

It is also important to keep in mind that each time an incident occurs on the A40 between Caerfyrddin and Crosshands traffic is diverted through Porth-y-rhyd. This occurs often.

9. Surface water problems

One of the main concerns regarding developments on unsuitable sites in the village is the impact on existing surface water problems.

There is a history of flooding in the village dating back many years. An elderly resident in her 90's used to describe an incident that happened in her childhood. Her recollection was vivid - of a river flowing towards the square and how the residents in those properties had to open the back door for the water to flow through as there was no other option.

Shortly after work began on the development known as Clôs y Wennol a 'lake' appeared surrounding two of the dwellings in Cwm Cati. The Fire Brigade officer exclaimed that there was absolutely nowhere the water could flow to. That was not the only time problems occurred as a result of surface water. Elderly residents in Cwm Cati had to call on their neighbours on numerous

occasions following heavy rainfall to help them mop up, clean and protect their properties.

Some fields are prone to ponding and large ponds appear following heavy rainfall on both this field and the Wernfraith proposed site.

Enclosed photos testify to the result of building on a Flood Zone and on a natural drainage field in the centre of the village. Other photos show the flooding that happened in 2009.

Residents are so fortunate that another site on a flood plain was turned down as an allocation for the LDP in 2019 as serious issues would have ensued. It was such a relief!

Surface water problems have existed in the area of this proposed development for years. All surface water flows from the sloped area behind and from the development along the old lane into this field which lies within flood zones. A portion to the southern side lies within zone C2 and an extensive area within zone B. Anecdotal evidence will confirm that this field is often saturated with a pond forming in the lower corner.

Where will all the surface water flow to once the field is under concrete?

Further along the road by the A40 junction to Caerfyrddin there is another development that has caused severe surface water problems. This nightmare for neighbouring householders came as the result of negligence and the lack of planning and monitoring as culverts and ditches were blocked and built on.

MAP has a file of correspondence recording twenty years of misery as this development which began in the 1990's is still ongoing and has not been adopted by the County Council.

As one resident noted : "It is true that a developer will claim to be able to sort out the problems on site but, as history has proven, in reality this is not the case and residents are left to their own devices to cope with the negative impact and consequences"

10. Sewerage System

There has been a lot of publicity recently about discharging raw sewerage into rivers. According to Welsh Water data this occurred at Pontfaen 77 times in 2021. This number of course does not include those incidences when raw sewerage seeped accidentally onto fields and gardens as seen in the photos.

- The Pump at Pontfaen which pumps the waste to the treatment plant in Cwmisfael is unable to cope with the extra capacity although it was upgraded a few years ago. That is not surprising when one considers the increase in dwellings and the increase in volume of surface water flowing off concreted fields post developments.
- 40 dwellings have been built in the village since c.2000 – **an increase of 43%**
- All these properties were built but no upgraded work carried out to improve the system.
- How is the system expected to cope with further developments in Porth-y-rhyd and Llanddarog?

It must be remembered that **both** villages are on the same system!

- We appreciate that the Planning Authority carefully assess each individual application. However, it is felt that there is a need to view the wider picture.
- There is a plan to develop a site of 42 dwellings at Wernfraith - an alternative site allocated in the LDP 2006 – 2018. If this plan goes ahead there will be catastrophic impacts to the village in terms of the sewerage system and surface water.

- A small cluster of dwellings is now proposed for site SuV20/h1 and possibly for a site near Tŷ Cynheidre. It's imperative to count all proposed numbers of dwellings in order to fully appreciate the strain that will be on the present system – a system that is NOT coping at present.

Porth-y-rhyd	Wernfraith	42	
	SuV20/h1	6	6? 10? 14?
	Cynheidre	5 ?	
Llanddarog	SuV19/h1	16	(0.903 hectar)
	SuV19/h2	15	(0.863 hectar)

The total (minimum) is 84 dwellings but could be far higher.

Imagine the strain on an already ineffective system.

And what about Windfall Sites? It's impossible to even hazard a guess at this stage!

Do you recall Porth-y-rhyd under threat sixty years ago back in 1963 when the Swansea Water Corporation wanted to drown the village?

Is there not a danger that the village will be drowned in 2023?

MAP contacted Welsh Water and as anticipated it was confirmed that upgrading work was required in most Welsh rural areas. Unfortunately there is no funding to carry out the improvements in the near future.

What will the situation be in the meantime?

Weather patterns are changing and will become more extreme in the future. We and future generations will have to cope with the impact. It will be too late to change things once fields have disappeared under concrete.

The experts are in agreement that it is unwise to build on land adjacent to Flood Zones as these are of vital importance with drainage.

The message is crystal clear in the letter sent to all Planning Authorities in Wales by Julie James AS (November 23rd 2021)

Given the immediate and serious challenges posed by the climate emergency, a 'business as usual' approach ... is no longer a viable option. Taking meaningful action to address climate change will mean taking difficult and sometimes unpopular decisions. The planning system is at the forefront of responding to the climate emergency and ensuring the well-being of current and future generations. The decisions local planning authorities make today will have a profound effect on how we adapt to climate change now and in the future. It is particularly important that we protect homes from flooding, when we know the devastating impact it can have on health and well-being.

MAP appreciates the willingness of the Applicant to change and adapt plans.

MAP appreciates the decisions and recommendations made by Forward Planning officers .

HOWEVER

- **despite the fact that the upper field has now been excluded**
- **despite the fact that an attempt has been made to avoid the designated flood zone area**
- **and although the number of dwellings now proposed is more in line with what would be expected in a villages**

the residents' concerns regarding the surface water and sewerage system OUTWEIGH the above amendments.

- There is a strong feeling of opposition in the village as this field has been REFUSED in the past based on sound planning arguments and following a robust and rational site selection process.
- It was agreed that MAP register an **OBJECTION** to the inclusion of candidate site SuV20/h1 and kindly request that a representative / representatives be present at a Hearing Session during the Public Examination when this proposed site is discussed.

3. WERNFRAITH

In the Additional Comments section it is stated: *This site is one of few opportunities in Porth-y-rhyd for new development, particularly with the **de-allocation** of the existing LDP allocation.*

It was so ironic to read this knowing full well that an application will shortly be submitted by the developers POBOL Group and Jones Henllan to build 42 dwellings on this site at Wernfraith Farm.

MAP has scrutinized the developers' plans for this site.

The impact will be horrendous!

In the meantime the residents participated in the Pre Application Consultation (PAC). 165 letters of **OBJECTION** were handed in to Evans Banks in addition to several emails sent.

It is the intention of the residents to **OPPOSE** this proposed development once a planning application is submitted.