

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 dudalennauchwanegol 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)

<i>Enw</i> Name	Dr John Studley	
<i>Teitl swydd (lle y bo'n berthnasol)</i> Job title (where relevant)	Secretary of Tirycoed Campaign Group and Independent Environmental Anthropologist	
<i>Sefydliad (lle y bo'n berthnasol)</i> Organisation (where relevant)	Tirycoed Campaign Group – comprising 45 people and 684 objectors in a petition I oversaw – I sought the permission of the TCG to represent them –nobody objected	
<i>Cyfeiriad</i> Address	[REDACTED]	
<i>Rhif ffôn</i> Telephone no	[REDACTED]	
<i>E-bost</i> Email address	[REDACTED]	
<i>Llofnodwyd</i> Signed	[REDACTED]	
<i>Dyddiad</i> Date	29/03/23	

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

Your name / organisation

Dr John Studley – Sec Tirycoed Campaign Group (with the help of Mark Vickers)

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?	
<i>Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle</i> LDP policy or site allocation number(s)	SP 1,3,7,8,9,11, 12 , 14 ,15,16,17
<i>Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran</i> LDP paragraph or section number(s)	SP 1,2,3,4,6,7,8,9, 11,12,13,14,15,16, 17,18,19
<i>Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol</i> LDP Proposals Map reference(s)	Map Reference -bbox [51.809101,-3.925159] [51.808981,-3.923050]
<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.	
<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.	No
<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.	Yes
<p>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff <u>newydd</u>?</p>	

Ticiwch bob un sy'n berthnasol.

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

The
Tirycoed
Well-being
Centre (for
well-being,
conservation
and
recreation

Polisi newydd
New policy

Reclassify
as public or
community
space

Paragraff neu destun ategol newydd
New paragraph or supporting text

See below 5
-3 and 4

4. Os ydych am ychwanegu dyraniad safle newydd, a wnaethoch gyflwyno'r safle yn flaenorol felsafle cais? Os felly, a fyddech 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

Amman Valley Maternity Hospital

Cyfeiriad y cais
Site reference

Map Reference -bbox
[51.809101,-3.925159] [51.808981,-3.923050]

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.

1. We (the Tirycoed Campaign Group) support the removal of the ground to the west of the old Maternity Hospital from "housing development" (See red circle on map) on conservation and access restriction grounds.

In terms of conservation the area qualifies for [SINC](#) status given that the rhos pasture and hedges which are protected habitats¹. The habitats are currently supporting or capable of supporting the following species; bats², dormice³, hedgehogs⁴, badgers⁵, otters⁶, newts⁷, lizards⁸, herons⁹, eels¹⁰ (in Nant Llwyd), water voles¹¹, Marsh Fritillary Butterflies¹², Scabious spp (Succisa pratensis in particular)¹³, Purple Moor Grass (Molinia caerulea)¹⁴, Brambles (Rubrus fruticosus) and Bracken (Pteridium aquilinum).

1 <https://naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/types-of-protected-areas-of-land-and-sea/?lang=en>

2 All bat species (and their breeding sites) are protected under schedule 5 of the Wildlife & Countryside Act 1981 and since 2007 the effective protection for bats now comes from Schedule 2 of the Conservation (Natural Habitats &c) Regulations 1994, and in the EU under Article 12 of the Habitats Directive, which means that capture, killing, deliberate disturbance and destruction of their breeding sites and resting places is prohibited.

3 Dormice (Muscardinus avellanarius) are protected under the aegis of the Wildlife and Countryside Act 1981 – schedule 5, a conservation priority species in the UK (Environment Wales 2016 Act) and a European Protected Species (Habitats Directive 92/43/EEC – schedule 2). Schedule 2 states it is an offence to destroy their habitat (breeding site or resting place).

4 Hedgehogs (Erinaceinae europaeus) are listed on Schedule 6 of the Wildlife and Countryside Act 1981 and the Wild Mammal Protection Act 1996.

5 Badgers and their setts are legally protected from intentional cruelty and from the results of lawful human activities (The Protection of

Badgers Act 1992)

6 Otters (*Lutra lutra*) are strictly protected by the Wildlife and Countryside Act 1981 and the EU Habitats Directive (92/43/EEC – Annex 4) and a priority species for maintaining biodiversity (Environment (Wales) Act 2016).

7 All newt species are protected under the aegis of the Wildlife and Conservation Act 1981 and the Great Crested Newt (*Triturus cristatus*) is a priority species (Environment (Wales) Act 2016) and a EU protected species (Habitats Directive 92/43/EEC- Annex 4)

8 The common Lizard (*Zootoca vivipara*) is protected under the aegis of the Wildlife and Conservation Act 1981 and a priority species (Environment (Wales) Act 2016) and the UK post 2010 Biodiversity Framework.

9 The heron is a protected species under the Wildlife and Countryside Act 1981, with fines or prison sentences available for anyone killing or attempting to kill one

10 Eels are protected as an endangered species by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)

11 The water vole is fully protected under Schedule 5 of the Wildlife and Countryside Act 1981 and is a priority conservation species.

12 Marsh Fritillary Butterflies are protected under schedule 5 of the Wildlife and Countryside Act 1981 and Wildlife (NI) order 1985, a priority species (Environment (Wales) Act 2016), and an EU protected species (Habitats Directive 92/43/EEC – Annex 2).

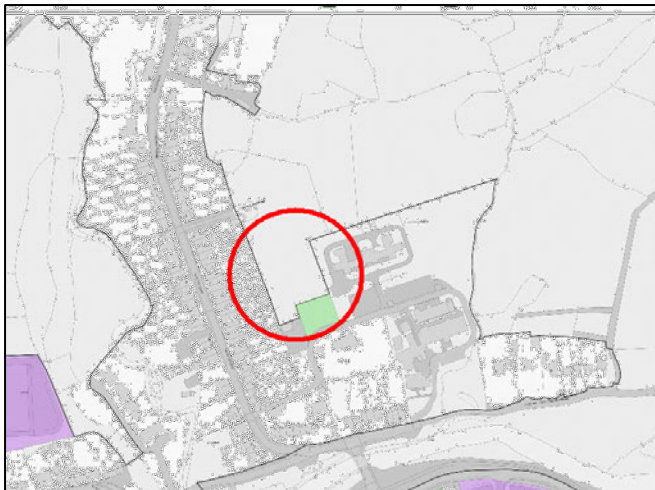
13 Important food for Marsh Fritillary Butterfly caterpillars



Marsh Fritillary Butterfly - Charles J. Sharp, CC BY-SA 4.0 <<https://creativecommons.org/licenses/by-sa/4.0/>>, via Wikimedia Commons

More on the importance of conservation in this area can be found at

<https://thunderbolt.me.uk/Docs/DrStudley-Objection-Rev3.pdf> which were submitted under the aegis of PA E/38266, but applies equally to the RLDP

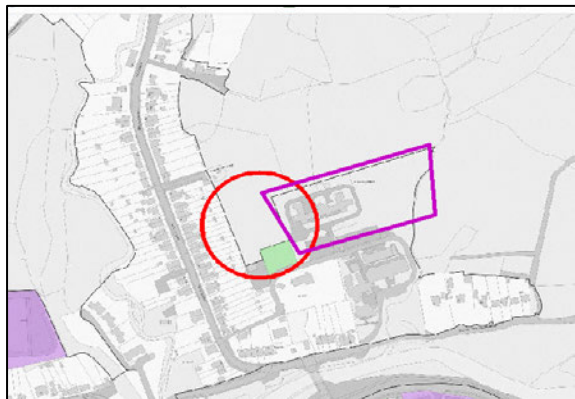


We also support the removal of this area from “housing development” because it would make it difficult for potential developers to build roads from Tirycod Road to the old maternity hospital. It was removed because CCC considered the area was undeliverable and was aware of the extent of opposition against its inclusion (Neil Bateman pers. comm 27/2/23). **Tirycod Road is already a single track road for much of the day (See [photo gallery](#)) and is potentially very hazardous for pedestrians and equestrians. In both petitions (Daffyd Wyn and TCG) local residents cited traffic issues as a main reason for objecting to PAs PACs and LDPs. The prospect of up to 50 new cars is not tenable.**

2. We object to possible housing development on the remaining development site (See purple box on map below) on conservation grounds and lack of access. **The management of**

Amman Valley Hospital have stated to us that they would not support any housing development on the old maternity hospital site.

We would remind CCC that nearly **700** people objected to housing development on this site under the aegis of both the RLDP and the current PAC (S21.186). (See online petition <https://www.change.org/p/no-to-the-housing-development-on-tirycoed> and door to door petition <https://thunderbolt.me.uk/Docs/Tirycoed%20Petition%20Redacted.rar>)



We would also draw your attention to the fact, that the actual size of this site would support a great deal more homes than the 25 currently being proposed in PAC S21.186. However we also object on the understanding that the current LDP cannot be met on the following grounds:

SP2 Retail and Town Centres

Both the [Brecon Beacons](#) and Glanamman have an ageing [demographic](#). Glanamman only has one small convenience store. There are no large retail outlets, unless you travel to Ammanford. There is no Dentist, the GP surgery is oversubscribed, there are no leisure facilities nearby and the local infrastructure is not able to cope with an influx of housing on this scale.

SP3 Sustainable Distribution – Settlement Framework

There are very few services available in this location and a housing development would put huge strain on existing ones. We constantly suffer from disrupted water supplies due to the ageing and inadequate water supply system, which would be overwhelmed by the additional capacity needed.

SP4 A Sustainable Approach to Providing New Homes

There has never been an “appropriate number” of houses suggested for this site. Although 25 dwelling houses are currently being requested, it is very clear that the site has capacity for at least 100. That would be a massive burden on the local infrastructure and facilities. The access road is not suitable for such volumes of traffic and there are already huge issues with water supply and drainage which have never been addressed.

SP9 Infrastructure

Given that some Tirycoed residents have had to pay for the upgrading of their electricity supply, due to its lack of capacity, we are only too aware how poor the local infrastructure is but especially water, electricity capacity and drainage.

SP12 Placemaking and Sustainable Places

Sustainable Placemaking should be holistic and inclusive and rightly be at the heart of any planning decision. It is important to recognise that sustainable placemaking is contingent upon local “sense of place” (comprised of place attachment, place identity, and place meaning), intrinsic value of place, and well-being (aka satisfaction, happiness). Most communities are resilient in the face of small changes that take place gradually. Sense of place, intrinsic value of place and well-being are distinctive in rural communities and may take several generations to develop. Rapid population growth or an influx of new people who are not wanted and who do not share the same sense of place or intrinsic value undermines social cohesion, place identity and place-making. There was some evidence that placemaking was undermined as a result of the introduction of flats on Tirycoed Road and this would be exacerbated should housing development go ahead.

Integrating wellbeing with sense of place helps make more explicit a range of social issues important for human welfare. Furthermore it draws out the importance of the phenomenological meanings that people attach to places through place attachment, place dependence, place identity, and place satisfaction. There are other often less tangible matters that arise as a consequence of changes in population size and structure that can impact wellbeing. This is a reflection of people's capacity to adapt to change, especially if change occurs at a rapid pace. For example, rapid increases in the size of a community can engender a sense of pessimism about the future and so affect people's sense of wellbeing. Similarly, changes in the composition of the population, in terms of demographics can lead to anxiety or tension impacting on the cohesion of society.

Very little has been done in Tirycoed under the aegis of PAs PACs or LDPs to assess the impact of housing development in terms of local identity sense of place, social cohesion, wellbeing or the undermining of the Welsh language

Furthermore any development should; comply with Welsh Government policy on sustainable places <https://research.senedd.wales/research-articles/making-sustainable-places-what-role-can-the-planning-system-play/>, and take account of the Well-being of Future Generations (Wales) Act 2015 and be predicated on

- Making the best use of resources;
- Facilitating accessible and healthy environments;
- Creating and sustaining communities; and
- Maximising environmental protection and limiting environmental impact.

Seemingly housing development will fail to meet most of those expectations. There are dangers that development will destroy established habitat and endangered species, it will cause light pollution and it will adversely affect community cohesion in which it is being placed.

SP13 Rural Development

Instead of increasing the enjoyment of the countryside, housing development would destroy it! The site is located close an area of outstanding natural beauty and the Amman Valleys unique cloud forest where wildlife currently thrives. Allowing such a large development on such precious land appears to be contrary to current rural development policy <https://research.senedd.wales/research-articles/the-rural-development-plan-for-wales/> which is predicated on “*the sustainable management of natural resources and climate action*”

SP14 Maintaining and Enhancing the Natural Environment

Housing development will destroy our unique and bio diverse landscape and our protected habitats and lead to loss of biodiversity. There are very real dangers that development will lead to the de-wilding of the site and the subsequent loss of bats, dormice, hedgehogs,

badgers, otters, newts, lizards, herons, eels (in Nant Llwyd), water voles, Marsh Fritillary Butterflies, Scabious spp (Succisa pratensis in particular), Purple Moor Grass (Molinia caerulea) and winter visitors such as snipe and woodcock



Devils Bit Scabious- Christian Fischer, CC BY-SA 3.0 <<https://creativecommons.org/licenses/by-sa/3.0/>>, via Wikimedia Commons

Previous planning applications have absolutely failed to address the issue of habitat destruction (Which the developers have been actively engaged in). Endangered species will be displaced and lost and riparian corridors will be blocked preventing otters (which are low in Wales) from travelling.



Example of habitat destruction on the site

SP15 Protection and Enhancement of the Built and Historic Environment

The old maternity hospital is unique and is considered the “heart” of the community. It still has an iconic status on the basis that the first [NHS baby was born there](#) on 5/7/1948. Given that many local people were born there and they retain a very strong sense of emotional attachment it would be sacrilege to demolish it. Furthermore the carbon cost of demolishing it (13 T C) and replacing it (242 T C) would be 255 TC which is more than double the carbon cost of refurbishing or retrofitting it which would be 120 T C (Hurst 2021: O’Hegerty 2021)

255 T C is the equivalent of the sequestration of 4,216 tree seedlings over 10 years ([Greenhouse Gas Equivalencies Calculator | US EPA](#))

If it were replaced by 20 houses the carbon cost would be about 2,410 T C or the equivalent

of the sequestration of 40,000 trees over 10 year (Berners-Lee 2010)

It would be better to refurbish and retrofit the existing building in terms of its carbon saving and its historic and psychological (place attachment) value.

Absolutely no consideration has been given to the wishes of the local community nor the protection of this historic site.

SP16 Climate Change

The destruction of Rhos pasture, trees and grassy marshland on this site would be an absolute disaster for the local environment and for the loss of carbon stocks. Paving over huge areas for roads and paths will create hard standing that will cause rain water to surge onto surrounding roads and properties, causing flooding. Previous planning applications have had few mitigating measures for renewable energy, carbon negative building materials or energy conservation schemes.

There has been no carbon audit of potential housing development on this site. It has been estimated (Drexler et al 2021, NERR094) that the current carbon stocks (rhos pasture, shrubs and hedges) on the whole site (ca 2ha) are 220 T C which will be cut by 84.75 T C to 135.25 T C after housing development. The carbon emissions (Berners-Lee 2010) as a result of development (25 houses plus roads, paths, drives, parking bays) will be approximately 3000 T CO₂ and there will be a sequestration reduction of 0.125 T C yr (NERR094)

SP19 Waste Management

Safeguarding resources would not be achievable if planning permission were granted for this site. The loss of trees and pasture would contribute to Climate Change while the amount of **carbon** that would be released (3000 T CO₂) during the construction phase alone would be damaging to the environment.

3. We suggest to CCC that the development site be taken into public ownership or classified as community or public space¹ and refer CCC to your obligations under the aegis of the **placemaking guide** 2020. (<https://dcfw.org/wp-content/themes/dcfw-child/assets/PlacemakingGuideDigitalENG.pdf>)

The importance of community space was highlighted in a recent supreme court ruling - **Hilary Term (2023) UKSC 8 on appeal from (2020) EWCA civ 1751- (R (on the application of Day) (Appellant) v Shropshire Council (Respondent) (landmarkchambers.co.uk)** where the court ruled in favour of the local community.

Furthermore the importance of having access to community space was a frequent theme highlighted in a consultation report on connected communities, and is especially important for Tirycoed's aging population

https://www.gov.wales/sites/default/files/consultations/2019-03/summary-of-responses_2.pdf

4. We propose that the site be used for well-being, conservation and recreation (with a well-being centre, a conservation area with pond, and board-walks for recreation and for interpretative trails (perhaps inter-connecting with Glyndrainog and Ty Llwyd farms). I would also remind CCC that the site is adjacent to the most important breeding ground (on Glyndrainog Farm) for the Marsh Fritillary Butterfly in the Amman Valley and to your obligations under the **placemaking charter** (<http://dcfw.org/placemaking/placemaking-charter/>) to provide spaces to promote prosperity, health, happiness, and **well-being** in the

widest sense.

This would meet the current requirements on the following grounds:

SP1 Strategic Growth

The installation of Health and conservation facilities would be far more beneficial for Tirycoed's aging demographic than housing for outsiders. Furthermore the site and its interpretive trails would be within easy reach of local Schools, so could be used as an outdoor education centre for children and adults alike.

SP2 Retail and Town Centres

Having a Community lead health and conservation facility on this site benefits everyone.

SP3 Sustainable Distribution – Settlement Framework

Our suggested project (The Tirycoed Well-being Centre) not only uses the existing building foundation as its base but it will be refurbished, retrofitted and managed sustainably, the exact opposite of the current proposals.

Retrofitting is the act of fitting new systems designed for high energy efficiency and low energy consumption to buildings previously built without them. This can range from small activities such as fitting energy-efficient light bulbs to installing state of the art heating systems. The reasons for doing this are simple. A more efficient building will be cheaper to run, have a lower impact on the environment and the higher energy rating that comes with this can increase the value of the property. There is a broad spectrum of commonly used methods of sustainably retrofitting properties. These include solar panels, smart meters and sustainable water and heating systems. It should be noted that the maintenance of these systems is just as important a consideration as their energy efficiency. <https://www.elmhurstenergy.co.uk/blog/2022/06/29/what-is-retrofit-in-construction/#:~:text=Retrofitting%20is%20the%20act%20of,of%20the%20art%20heating%20systems.>

SP6 Strategic sites

This project will invest in the local Community and provide much needed facilities for all, but especially our **ageing population**¹. This inward development will also create local sustainable jobs, benefit local business and bring a much needed boost to the local economy.

1 In Carmarthenshire between 2011 and 2021 there was an increase of 18.9% in people aged 65 years and over, a decrease of 2.5% in people aged 15 to 64 years, and a decrease of 0.8% in children aged under 15 years
<https://www.ons.gov.uk/visualisations/censuspopulationchange/W06000010/>

SP7 Employment and the Economy

This project will invest in the local Community and provide much needed facilities for all, but especially Tirycoed's aging population. Currently there are no leisure facilities. This inward development will also create local sustainable jobs, benefit local business and bring a much needed boost to the local economy. It will also serve as a Community hub, allowing people to meet and interact, something a housing estate appears to discourage.

SP8 Welsh Language and Culture

The plan to build houses on this site will simply allow wealthier people from outside the local area to have better homes. Our plan will bring the local community together and enhance its integration, keeping the Welsh language alive, rather than causing its demise due to the influx of non-Welsh speaking people.

SP9 Infrastructure

This centre could be both refurbished, retrofitted and managed to meet the felt needs of

our local demographic and include features such as water harvesting, solar panels and ev points.

SP11 The Visitor Economy

With careful planning, the site could also be made to meet the requirements of local tourism and education. It is very close to an area of outstanding natural beauty and cloud oak forests which are full of rare and exotic wildlife.

SP12 Placemaking and Sustainable Places

Our proposal would fully comply with the **placemaking charter** (<http://dcfw.org/placemaking/placemaking-charter/>) and we would endeavour to provide spaces to promote prosperity, health, happiness, and **well-being** in the widest sense. Furthermore we would endeavour to ensure the site was both sustainably managed (possibly with help from [INCC](#)) and built to enhance and improve the local biodiversity, with all the benefits this would bring.

More on the importance of placemaking in this area can be found at <https://thunderbolt.me.uk/Docs/DrStudley-Objection-Rev3.pdf> (part b) which were submitted under the aegis of PA E/38266, but applies equally to the RLDP

SP13 Rural Development

Again, this site absolutely fulfils the requirements of this section of the RLDP. It actively improves and enhances the available facilities accessible to the local Community, while adding and improving local facilities for all.

SP14 Maintaining and Enhancing the Natural Environment

Habitat conservation is at the heart of what our proposal will include, unlike the questionable development currently proposed, which has habitat destruction at its heart. Efforts will be made to improving the landscape and biodiversity naturally, by using cattle to lightly graze the Rhos pasture, establishing ponds and encouraging natural regeneration. These are just some of the many ways our proposal would fully meet this requirement of the RLDP.

SP15 Protection and Enhancement of the Built and Historic Environment

The current proposal to simply destroy the existing iconic building on this site is not tenable on the basis of history, heritage, place attachment and carbon cost.

Any required works (such as refurbishment and retrofitting) would be carried out sympathetically and in an environmentally sensitive way.

SP16 Climate Change

Again, our proposal fully meets these requirements by using sustainable methods and by protecting valuable natural assets. There would be no need to destroy vast areas of natural land, as would be the case if a housing development was allowed. The refurbishment and retrofitting of the old hospital building as a well-being centre will have a carbon cost of ca 120 T C and will have minimal impact on carbon stocks, carbon emissions and carbon sequestration rates. Carbon stocks on the remaining area (ca 0.7663 ha) will be approximately 85 T C with an annual sequestration rate of 0.38 T C (NERR094)

SP17 Transport and Accessibility

This site already has transport links that can be used to reach it from all over Carmarthenshire. The site is close to the Amman valley cycleway and if the [Swansea 9 Lines project](#) comes to fruition train visitors would be a possibility. Our plans would include access to Electric vehicle charging points, to encourage sustainable travel to the site.

SP18 Mineral Resources

Our proposal would actively promote improvements to the environment encouraging carbon sequestration and improving the local landscape to the benefit of the environment.

SP19 Waste Management

We will be investing in solar and wind power installations to make the site self sufficient for its energy and thus reducing reliance in carbon generation.

References

Berners-Lee, M. 'What's the Carbon Footprint ofBuilding a House'. The Guardian, 2010, Environment - Green Living Blog.

Drexler, S, A Gensior, and A Don. 'Carbon Sequestration in Hedgerow Biomass and Soil in the Temperate Climate Zone'. Regional Environmental Change 21, no. article number 74 (2021): 157-.

Hurst, W. (2021) Derby Assembly Rooms' carbon cost of demolishing laid bare, Architects Journal, 22 June 2021

NERR094. 'Carbon Storage and Sequestration by Habitat: A Review of the Evidence (Second Edition)'. Natural England, 2021.

O'Hegarty, R. (2021) The embodied carbon of buildings, Share Your Green Design

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.

X

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').

Amman Valley Hospital site

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.

No

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 Plan or its supporting documents. You should

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.

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.