

**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](http://www.sirgar.llyw.cymru). Os ydych yn cyflwyno copi papur, atodwch dudalennau ychwanegol lle bod angen.*

*Bydd angen i unrhyw sylwadau a wnaed i'r CDLI Adneuo 1af gael eu hailgyflwyno fel rhan o'r ymgynghoriad ar yr 2il Adnau CDLI. Dim ond sylwadau a wnaed yn briodol i'r 2il CDLI Diwygiedig Adneuo fydd yn cael eu cyflwyno yn yr Arholiad. Ni fydd sylwadau a wnaed i'r CDLI Adneuo 1af bellach yn cael eu hystyried ac ni fydd yn rhan o'r Arholiad.*

*Mae gan y ffurflen hon ddwy ran: Rhan A (Manylion personol) a Rhan B (eich sylw). Sylwer y bydd Rhan B ar gael i'r cyhoedd a chaiff ei hanfon at Yr Arolygiaeth Gynllunio.*

**Mae'n rhaid derbyn eich sylwadau erbyn 4:30pm ar y 14 o Ebrill 2023.**

*Dychwelwch ffurflenni at:*

*Rheolwr Blaen-gynllunio, Lle a Chynaliadwyedd, Adran Lle a Seilwaith, 3 Heol Spilman, Caerfyrddin, SA31 1LE*

We would like your views on the Revised Carmarthenshire Local Development Plan (LDP) 2nd Deposit, and also on documents which support the LDP.

This form should be used for all representations (i.e. comments or objections). Electronic versions and guidance notes are available at [www.carmarthenshire.gov.wales](http://www.carmarthenshire.gov.wales). If you are submitting a paper copy, attach additional sheets as necessary.

Any representations made to the 1<sup>st</sup> Deposit LDP will need to be resubmitted as part of the consultation on the 2<sup>nd</sup> Deposit LDP. Only duly made representations to the 2<sup>nd</sup> Deposit Revised LDP will be submitted for examination. Representations made to the 1<sup>st</sup> Deposit LDP will no longer be considered and will **not** form part of the Examination.

This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that Part B will be made publicly available and will be forwarded to the Planning Inspectorate.

**Your representations must be received by 4:30pm on the 14th April 2023.**

Please return forms to:

Forward Planning Manager, Place and Sustainability, Department of Sustainability and Infrastructure, 3 Spilman Street, Carmarthen, SA31 1LE.

**RHAN A: Manylion cysylltu****PART A: Contact details***Eich manylion/manylion eich cleient*

Your details / your client's details

*Manylion yr  
asiant (os ydynt  
yn berthnasol)***Agent's details**  
(if relevant)*Enw*

Name

Susan Allen

*Teitl swydd (lle y bo'n  
berthnasol)*

Job title (where relevant)

County Councillor

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

Whitland Ward Member

*Cyfeiriad*

Address

[REDACTED]

*Rhif ffôn*

Telephone no

[REDACTED]

*E-bost*

Email address

[REDACTED]

*Llofnodwyd*

Signed

[REDACTED]

*Dyddiad*

Date

14.04.2023

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

Your name / organisation

Councillor Sue Allen WHITLAND Ward member

**1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau?****1. Which part(s) of the Plan (or supporting documents) are you commenting on?***Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad  
safle*

LDP policy or site allocation number(s)	
<i>Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran</i> LDP paragraph or section number(s)	
<i>Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol</i> LDP Proposals Map reference(s)	
<p><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></p> <p>If your representation relates to a supporting document' including the:</p> <p>Sustainability Appraisal), and/or Habitat Regulations Assessment</p> <p>insert the name of the document and section reference(s) and/or paragraph number here.</p>	
<p><b>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.</b></p> <p><i>I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.</i></p> <p><b>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.</b></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.	x
<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.	x
<i>Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.</i> I think that the procedural requirements have not been met.	
<p><b>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff newydd?</b></p> <p><i>Ticiwch <u>bob un</u> sy'n berthnasol.</i></p> <p><b>3. Would you like the LDP to include a <u>new</u> policy, site allocation or paragraph?</b></p> <p>Tick <u>all</u> that apply.</p>	

<i>Dyraniad safle newydd</i> New site allocation	X
<i>Polisi newydd</i> New policy	X
<i>Paragraff neu destun ategol newydd</i> New paragraph or supporting text	X
<p><b>4. Os ydych am ychwanegu dyraniad safle newydd, a wnaethoch gyflwyno'r safle yn flaenorol fel safle cais? Os felly, a fydddech cystal â rhoi enw a chyfeiriad y safle cais (os yw'n hysbys).</b></p> <p><b>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).</b></p>	
<i>Enw'r safle</i> Site name	
<i>Cyfeiriad y cais</i> Site reference	SR/163/010 SR/163/007
<p><i>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.</i></p> <p>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.</p>	
<p><b>5. Rhestrwch eich sylwadau isod.</b></p> <p><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. Dim ond os bydd yr</i></p>	

*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.

#### **BROWNFIELD SITES -policy**

In respect of all unused sites , particularly brown field but not ruling out Housing/retail sites , that have been vacant for more than eg. 25 years then the planning allocation should automatically be mixed use or white land. There is no reason such sites cannot be used for allotments, parking, leisure, innovative trendy housing even built with containers for example.



The former creamery site in Whitland SR/163/007 is an example of such central dereliction and a shameful waste of an area close to services that could have been useful to the town and surrounding areas. It is an eyesore and affects visual amenity and the wellbeing of residents.

The inspector, as I understand, removed the lower part of the site from the development line due to a flood plain. Given that the reason for the great flood of 1986 in Whitland is rectified and there are further flood barriers this decision was unfortunate and the site could not even be used for allotments, community car parking, retail and even much needed Housing. Going forward if climate change may impact any parts of the site then it is up to the owners of such sites to provide the requisite studies to suit the proposed uses.

Whitland has excellent transport infrastructure and good work opportunities but needs something exciting doing with this disused site.

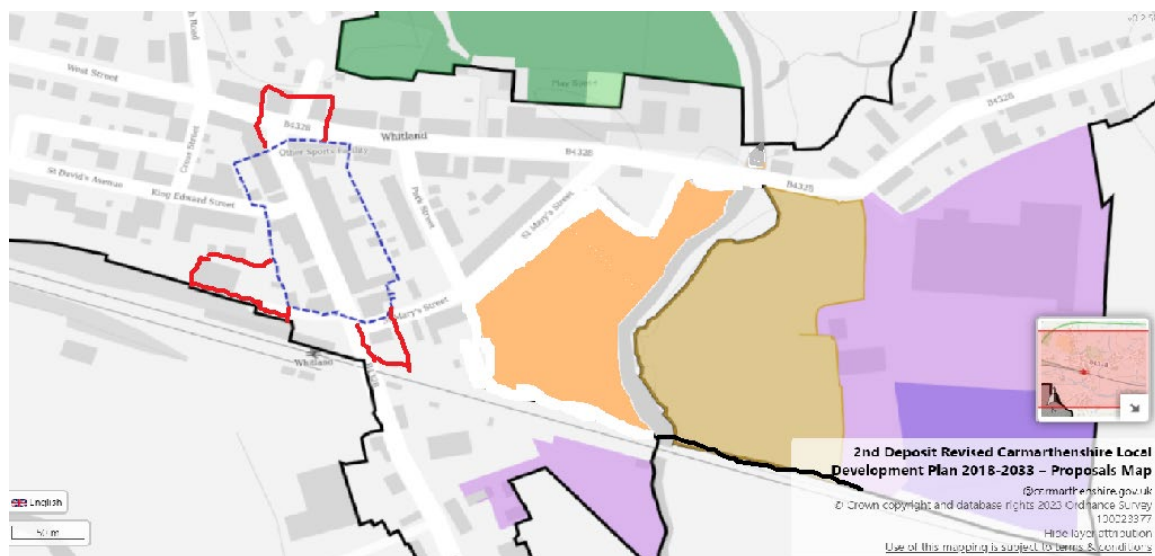
## RURAL TRANSPORT

There is only a remote chance of rural buses that can be run economically and sustainably on a daily basis at times to suit people who would otherwise use a car.

Disused railway lines such as that was formerly in the UDP as a route from Whitland to Cardigan ( Cardi Bach ) should be protected as these routes were instrumental in the sustainability and economic generation of rural hamlets. Following closure these villages en route became stagnant. Old railway routes use as pathways and cycle routes enables safe connections between communities and these can used by young people to prevent rural isolation and reliance on parental taxis.. With the increase in the use of electric bikes it enables Community for less athletic persons as well as potential tourism. Cafes or local historic features along the routes enable rural enterprise supporting the circular economy.

## WHITLAND TOWN CENTRE

This designated outline is inaccurate in my view as it omits various very longstanding retail units of half a century or more.see attached map for proposal as a matter of fact.



## LOCAL CONCERN

SR/163/010 Residents are concerned about the velocity of the off flow from the hill above this development and indeed this velocity lifted tarmac off a bridge and it does cause localised flooding. The site lacks footways and any such development requires very careful management of downward water flows on both sides of this allocation in case homes here suffer from such velocity and mud spills from the hillside above as do current residences.

## HOUSING

Rural needs are greatly restricted by the policies related to affordable Housing. There is a greater level of self employment in rural areas and to provide work life balance homes of sufficient size are restricted by WAG Policy. A home Office, utility area sufficient to manage outerwear from rural surroundings, workshop are essentials to manage rural living in a fast paced environment. Some young people do return after study or working away but much of this depends upon availability of skilled employment and the possibility of creating a home for life and self employed or remote work in one unit. Affordability of a larger build size is a restriction but does not take into account that the build may be incremental and if budget is restricted (according to figures presented for build size) then persons can complete the more expensive internal works as budget becomes available.

People (and animals) are healthier in well ventilated, well designed spaces.

Affordable homes generally do not have sufficient garden size as did the old council homes and Commercial estates, in my view, are too uniform. Whilst budgets can be restrictive there is no excuse for inadequate design.

There has not been a housing needs survey for this revision and reliance on the Housing register is not a reflection of the many aspirations of those who wish to return home to contribute to the Community raise families or retire on their family farms.

The same applies to rural enterprise which is essential to the circular economy. Supporting SMEs to thrive where they can find a niche keeps a rural area vibrant and innovative.

Land banking that is tied up in pension schemes perhaps is another issue that restricts potential from none allocated sites.

I recognise this may not be as concise or eloquent as other submissions but there seems to be a mismatch of understanding between urban and rural living needs.

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

x

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

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

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

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

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

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

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

*Rwyf am siarad mewn sesiwn gwrandawriad.*

I want to speak at a public hearing.

x

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

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

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

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

*Rwy'n dymuno cael fy nghlywed yn Gymraeg.*

I wish to be heard in Welsh.

*Rwy'n dymuno cael fy nghlywed yn Saesneg.*

I wish to be heard in English.

x



## 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

*hystyried, cyhyd â'i fod yn perthyn i'r Newidiadau Canolbwyntiedig. Dylech gynnwys eich holl sylwadau ar y ffurflen, gan ddefnyddio dogfennau ychwanegol a thystiolaeth ategol lle bod angen.*

*Os ydych yn ceisio am fwy nag un newid i'r Cynllun, nid yw bob tro yn angenrheidiol i lenwi ffurflenni ar wahân ar gyfer pob darn o'ch sylw. Fodd bynnag, gallai fod yn ddefnyddiol o bosibl i ddefnyddio dwy ffurflen ar wahân os ydych yn dymuno siarad mewn gwrandawriad am rai gwrthwynebiadau ond nid rhai eraill.*

*Pan fydd grŵp yn rhannu barn gyffredin ar sut mae'n dymuno i'r Cynllun gael ei newid, byddai'n ddefnyddiol i'r grŵp hwnnw anfon ffurflen unigol gyda'u sylwadau, yn hytrach na bod nifer fawr o unigolion yn anfon ffurflenni ar wahân yn ailadrodd yr un pwynt. Mewn achosion o'r fath, dylai'r grŵp nodi faint o bobl mae'n eu cynrychioli a sut gafodd y sylw ei awdurdodi. Dylid nodi cynrychiolydd y grŵp (neu'r prif ddeisebydd) yn glir.*

Plan or its supporting documents. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.

If you seek more than one change to the Plan, it is not always necessary to complete separate forms for each part of your representation. It may, however, be helpful to use two separate forms if you wish to speak at a hearing about some objections but not others.

Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified.