

**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**

<b>Eich manylion/manylion eich cleient</b> <b>Your details / your client's details</b>		<b>Manylion yr asiant (os ydynt yn berthnasol)</b> <b>Agent's details (if relevant)</b>
<i>Enw</i> Name		Richard Walker
<i>Teitl swydd (lle y bo'n berthnasol)</i> Job title (where relevant)		Planning Director
<i>Sefydliad (lle y bo'n berthnasol)</i> Organisation (where relevant)		Lightwood Planning
<i>Cyfeiriad</i> Address		[REDACTED]
<i>Rhif ffôn</i> Telephone no		[REDACTED]
E-bost Email address		[REDACTED]
<i>Llofnodwyd</i> Signed	[REDACTED]	
<i>Dyddiad</i> Date	13/04/2023	

**RHAN B: Eich sylw****PART B: Your representation**

<i>Eich enw / sefydliad</i> Your name / organisation	Lightwood Planning
<b>1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau?</b> <b>1. Which part(s) of the Plan (or supporting documents) are you commenting on?</b>	
<i>Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle</i> LDP policy or site allocation number(s)	SP1 'Strategic Growth'

<p><i>Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran</i></p> <p>LDP paragraph or section number(s)</p>	<p>Section8: 'Strategic Growth and Spatial Options', notably paragraphs 8.1-8.8 &amp;</p> <p>Section 11: 'Policies', notably Policy SP1 'Strategic Growth'</p>
<p><i>Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol</i></p> <p>LDP Proposals Map reference(s)</p>	<p>N/A</p>
<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: 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>N/A</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>	
<p><i>Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol.</i></p> <p>I think the LDP is sound and meets procedural requirements.</p>	
<p><i>Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid.</i></p> <p>I think the LDP is unsound and should be changed.</p>	<p>X</p>
<p><i>Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.</i></p> <p>I think that the procedural requirements have not been met.</p>	<p>X]</p>
<p><b>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff newydd?</b></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

Yes

*Polisi newydd*

New policy

Revision to  
SP1

*Paragraff neu destun ategol newydd*

New paragraph or supporting text

N/A

**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).**

**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

Land south of Maeglas, Penygroes, Llanelli

*Cyfeiriad y cais*

Site reference

This site was submitted part of representation at First Deposit Stage (Jan-Mar 2020) and was proposed for 44 dwellings.

We are unable to identify site within the Council's 'Site Assessment Table (2023)', which can be accessed here

<https://www.carmarthenshire.gov.wales/home/council-services/planning/local-development-plan-2018-2033/candidate-sites/#.ZDfWI3bMJyw>

There may therefore be a clerical error, meaning that the site has not been considered

Noting the evaluation of the somewhat comparable sites referenced 'SR/132/006' and SR/132/007 at Penygroes, and their progression to Stage 3 of the Assessment process, we assess 'Land south of Maeglas', performs similarly. Ultimately, despite the positive evaluation of SR/132/006 and 007 neither was carried forward into the Plan as sufficient housing for the village was said to have been identified on more suitable sites and these could accommodate its housing need, such as the Emyln Brickworks (PrC3/MU1) for 177 homes and 'Adj to Pany Blodau) for 79 homes.

	<p>Sites SR/132/006 and 007 at Penygroes were however, carried onto into the 'Site Allocation Assessment' of Reasonable Alternatives (February 2023).</p> <p>Any clerical error on behalf of Council should be rectified and that the evidence base should be updated in respect of Land south of Maeglas, Penygroes. Whether this process causes the Plan to be changed or not is another matter, and related to the overall level of growth to be planned for, as discussed in our primary comments.</p> <p>A site location plan and illustrative layout plan for 44 homes is attached to this representation.</p>
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*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.

Our comments on the First Deposit Plan are set out below and remain relevant. There has been some updating of the evidence base for the Plan since March 2020, this does not fundamentally alter the case that we presented in March 2020. Then as now, the housing requirement for 2018-2033 is 8,825 which we said was too low. Of note is that the First Deposit Plan enabled 10,160 homes whereas the Second Deposit Plan enables 9,704 homes. There is therefore a reduction in embedded flexibility and contingency, for a plan requirement that is already not representative of a positive socio-economic vision.

### **First Deposit Stage**

At First Deposit Stage we made the following comments

Section 8 of the Deposit LDP sets out the range of growth options that have been prepared to inform the Plan.

The PG 10-year scenario from the 2019 Edge Analytics Report has been selected which generates a requirement for 8,835 homes for 2018-2033 (589 per annum) and 354 jobs per year.

The general thrust of Section 8 is that the housing requirement should at least reflect the rate of housing delivery that has been experienced since 2015 (545 homes per annum).

Lower growth options are rejected for negative socio-economic impacts and non-adherence to the Plans Vision and Strategic Objectives. We agree.

Higher growth options are presented positively, notably the output for 'Population Growth Long Term (2018 Report) for 9,887 homes (659 per annum) and 353 jobs per year and 10,065 homes and 439 jobs per year (PG Long Term (2019 Addendum Report)). The latter now essentially forms the proposed supply figure.

The proposed housing supply of the Deposit LDP is said to be capable of delivering 10,160 homes (a 15% uplift to ensure that the base requirement is met).

We conclude that the proposed requirement is far too low. At the very least it should be 10,065 homes (baseline), With a 15% uplift for flexibility generating a supply figure of 11,575 homes. This generates a need for another 1,415 homes.

A scenario of 14,090 homes and 632 jobs per year derived from pre-recession trends is said to be commensurate with the adopted LDP. This is said to be economically ambitious but 'undeliverable' and 'unsustainable'. We note that the Council do not say that 632 jobs per year is unrealistic as forecast, and rightly so. The Council's own Employment Sectoral Report (WSP, 2017) generates a forecast for 2017-2032 of 18,681 jobs (1,245 per annum, or 1,182 after 'double-jobbing'.

We are not convinced that a baseline requirement of 14,090 homes and 632 jobs per annum is 'undeliverable'; in terms of housing or employment growth. It is not unsustainable socio-economically. We see no evidence that it would be environmentally unsustainable to attempt to meet these figures, wholly or in part.

The spatial strategy should seek to meet these higher figures, subject to land suitability and availability.

Policy SG1 should be amended to seek to meet as far as possible a previously achieved set of development outputs for the area

We agree with the selection of spatial strategy Option 4 in order to have a strategy in place for the 6 sub-areas (clusters) of the County that have been identified.

### **Second Deposit Plan**

Section 8 now optioneers the First Deposit Strategy against the Welsh Government's 2018 based population projections. Both the principal projection and higher variant are rejected as being unrepresentative of a sustainable future for the area. Instead, the Council generally prefers 10-15 year trend based population projections (which present similar outputs) as presenting a more positive vision. They are also more in tune with the strategy and housing requirement of the First Deposit Plan.

The final two scenarios generate higher housing requirements of around 10,000 - 10,500 homes. Although yet higher still than previous completion rates these are still some way below pre-recession growth rates.

We question why the final two scenarios would not deliver the Vision and Strategic Objectives for the area and the confidence with which the Council states that this level of growth would tip into being undeliverable. Quoting percentages masks a relative modest uptick in actual delivery rates. It is not the case that the higher ambition within the final two scenarios would cross a threshold in terms of their environmental effects.

We maintain our comments, expressed at First Deposit Stage, that, at the very least the Plan's housing requirement should be 10,065 homes (baseline), with a 15% uplift for flexibility. This generates a supply figure of around 11,575 homes, as opposed to the 9,700 enabled by the Plan.

The pre-recession trend scenario no longer appears in the Second Deposit Plan, so presumably the Council no longer considers it to be a reasonable alternative?

### **Site Submission**

Against this background additional land at Penygroes should be allocated within Settlement Cluster 3. The Plan already allocates land for 290 homes across 5 sites and these all have planning permission. Emlyn Brickworks (PrC3/MU1) (177) and land adjacent Pant y Blodau (PrC3/h22) (79 homes) account for 88% of proposed new homes.

Land west of Waterloo Road and south of Maesglas (previously submitted at First Deposit Stage) should be allocated for 44 homes.

A site location plan and testing layout is attached to this representation showing an indicative layout for 44 homes. The site is already contained on 3 sides, including

the relatively recent development at Clos Ael-Y-Bryn to the south and Cwrt Y-Fynnon to the north east. The surrounding settlement and a strong hedgerow to the east provide a high degree of enclosure and the land is within the general envelope of the village.

We assess that the ISA of this site is identical to that prepared by the Council for the allocated site known as 'land adj Pant y Blodau' (PrC3/h22) in respect of significant effects. This concludes that "This site does not utilise previously developed land, however it otherwise performs well against the sustainability framework".

We also refer the inspector to the procedural issues raised under section 4 of this representation.

*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.

Yes – Site Plans

**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.

X

*Rwyf am siarad mewn sesiwn gwrandawriad.*



I want to speak at a public hearing.	
<p><i>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').</i></p> <p>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').</p>	
<p><b>7. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed.</b></p> <p><b>7. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.</b></p>	
<p><i>Rwy'n dymuno cael fy nghlywed yn Gymraeg.</i></p> <p>I wish to be heard in Welsh.</p>	
<p><i>Rwy'n dymuno cael fy nghlywed yn Saesneg.</i></p> <p>I wish to be heard in English.</p>	

## 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.