



Lesley Griffiths AM
Cabinet Secretary for Energy, Planning and Rural Affairs
National Assembly for Wales
Cardiff Bay
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CF99 1NA

25 April 2018

Dear Lesley,

Planning Application – S/37111

I am requesting that this planning application is called-in by the Welsh Government. I support the principle of building a replacement school for Ysgol Dewi Sant, which I agree is desperately needed, but I do object to the unnecessary loss of a much valued area of open space.

In line with national planning policies, I believe that everyone should be able to easily access informal recreational facilities and open space. I further believe that this planning application conflicts with national planning policies with regard to the fact that areas of open space such as Llanerch Field are part of the make-up of a residential area and act as a form of 'green lung'. They should not be lost to development unless there is no alternative – which does not apply in this case as an alternative brownfield site has been identified.

This application also raises novel planning issues, given that the application site is allocated in the Carmarthenshire Local Development Plan under policy REC1 Protection of Open Space. Strategic policy in this regard is covered by policy SP16 Community Facilities. Paragraph 5.9.131 states, in part, as follows:-

'Community facilities contribute significantly to the quality of life, enjoyment and inclusivity of settlements and communities within the County. In this regard, their potential loss should be carefully considered given consequential impacts in terms of sustainability and community identity. The protection and retention of community facilities should, wherever feasible, be considered and responsive approaches adopted to assist in their retention.'

Paragraph 5.9.132 specifically addresses the benefits of recreational land as follows:-



'The promotion of accessibility to formal and informal recreation and leisure is an important consideration for the LDP. Sports fields, parks and wider natural based amenities such as waterways and woodlands provide opportunities for potential health benefits. They also have potential to mitigate against the causes and effects of climate change and can provide arenas for social interaction.'

This facility is a community open space. Based on this alone, the development is clearly contrary to LDP policy REC1.

Nine sites were chosen without any initial recourse to the public and was then followed by a desktop-only assessment with the scoring system seemingly done on a relatively arbitrary, and often unsupported, basis. I am concerned that the decision was reverse engineered to produce the desired outcome. This struck me when I read the full business case.

It would appear that the Local Authority chose a site that was seen as the easiest site on which to build and then worked backward from that to justify the decision. When settling on this site as the preferred option, the primary criteria were 'achievability and affordability issues'. The first advantage of the Llanerch site is listed in the full business case as 'the site lies entirely within the ownership of Carmarthenshire County Council' (p12), and concludes in summary saying the 'site represents the best value for money and the best strategic fit for Carmarthenshire County Council' (p.46)

I was also concerned to read that this was an internal officer decision and the way that community feeling is represented is not accurate. For instance, the decision to opt for Llanerch was made early on (April & November 2016) at two 'stakeholder workshops'. However, it is clear that their definition of a stakeholder only extends to Council officers.

An advantage of Llanerch is listed as being 'politically and socially acceptable to the local communities of Llanelli and the surrounding area' (p13). However, further in the document, it states that 'there is a small number of members in the community who have expressed concerns as to the location of the site' (p.17); and, in the summary of risk appraisal results, (p42) the risk of 'lack of stakeholder support for scheme' is rated as 9 (High equals 10). The definition of a stakeholder is, as mentioned previously, not given and the risk that the scheme will have a 'low level of public support' is rated as zero and that 'in general the scheme is fully supported by the Community, Governing Body, Parents and Staff.' (p45)

The council assumption in the business case on this particular point is dramatically wrong. In total, 665 letters opposing the building of a school on Llanerch fields have been sent to Asbri Planning. (This does not include email objections). A written petition of 902 signatures have been collected and the online petition has 1,233 signatures.



In determining the site for the new school, the value of green space played no part in Carmarthenshire County Council's decision and the provision of a community facility is largely seen as an income generating measure (though one they are not sure will be successful in those terms). Llanerch is an area of multiple deprivation; the children here cannot afford to participate in 'paid' sporting activities, therefore, the loss of this 'free' play space will have a negative effect upon the local community. To add to this, the adjoining Penygaer recreational space is in the process of being asset transferred to a joint management committee, (made up of football and rugby representatives), who will also need to charge for use in order to afford to maintain the site.

I am concerned that the safeguarding of green space is not mentioned at all. In fact in the SWOT analysis for the site there are a list of strengths but the only weakness that is considered is that the new building will require significant investment. In fact 'greater job security for staff' is given more consideration, and is given a weighting of 5% in the scoring of different options. The benefits to the community are also weighted at 5% but they are defined as a "Sense of permanence, continuity and greater interaction between staff, school and community at large" and "school focused towards the needs of the community"

In terms of community facilities, the business case reports that "The communities of Llanelli will benefit from the use of shared facilities such as a sports pitch and hall which could (my emphasis) be used for a number of activities such as sports, drama and courses for adults in the locality" (p.14). However, listed under the main benefits of the preferred option is that the site will release cash from 'income from community use of facilities', but it in the summary of risk appraisal results, the 'risk that actual community usage of the service varies from the levels forecast as a benefit' is rated as 8 (High equals 10).

It should also be noted that there is a 5100m³ underground sewage tank under the field, (i.e. 169m X 16.5 X 3m), which is an essential component, in conjunction with the £96m Rainscape initiative now being completed, to alleviate the historic flooding issues in Llanelli. A pre-planning report from Hydrock states that in the event of a system failure the sewage would come up through the manholes, located on the field, and flow down towards the river Lliedi, where, in its passage, would be the new school, which has to be sited alongside the river as Dwr Cymru hold an easement on the tank which prohibits building over it.

To conclude, I request that a call-in decision be made on the issues that Llanerch Field is part of the make-up of a residential area and, as such, is 'green lung'; an alternative brownfield site has been identified that would be suitable for the new Dewi Sant school; the application site is allocated in the Carmarthenshire Local Development Plan under policy REC1 Protection of Open Space and, therefore, contrary to LDP policy REC1; the decision to build the school on this land was reverse engineered; community feeling that is represented within the business case is not accurate; the value of green space played no



part in Carmarthenshire County Council's decision, and there is a 5100m³ underground sewage tank under the field.

I look forward to your response.

Yours sincerely,

Lee Waters AM/AC