

Lesley Griffiths AC/AM  
Cabinet Secretary for Energy, Planning and Rural Affairs  
Welsh Government  
Cardiff Bay  
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Dear Mrs Lesley Griffiths,

**I request that Planning Application S/37111 from Carmarthenshire County Council to construct a new school on Llanerch Recreational Playing Field should be called in for a decision by the Minister for the Environment in Cardiff.**

I believe that the proposal raises issues of more than local importance as follows :-

- A) May conflict with national planning policies:-
- 1) The application site is a greenfield open space with designation of REC1 under CCC Local Development Plan .  
Why is this allowed happen ?
  - 2) Along the south side of the application site lies the River Lliedi which forms a hydrological link with the Burry Inlet which is part of the Carmarthen Bay and Estuaries European Marine Site (SAC) to accord with the terms and content of the Memo of Understanding(MOU), protection of the water environment is a material planning consideration .  
The Drainage Strategy within this application is meant to be clear and factual whereas it has gross errors of understanding regarding the operation of the extensive foul sewage tanks and public sewers on site which according to the Flood Consequence Assessment that if in the event of failure there is the potential of residual risk of sewage flooding from the manholes.  
Why are these facts and this situation being ignored by the submission of this application?
  - 3) May give rise to the to substantial controversy beyond the immediate locality.  
The proposed school of 480 places is oversubscribed to the Welsh Schools around it, and it is described as a community school, over 50% of the existing pupil population is from outside the catchment area, meaning pupils have to pass adequate school provision in their own locality.  
Why is this oversubscribed situation allowed to occur when the Director of Education has already stated that there are over 150 places in the the two immediate schools to this proposal?  
Why is the Business Case review by the Welsh Government not undertaken in a more thorough and detailed manner before just rubber stamping to support such situations?
  - 4) Are likely to significantly affect sites of scientific, nature conservation or historic interest or areas of landscape importance.  
The risk from silt pollution on the SAC is high that detailed control measures are being called for by the NRW  
The use of geomembranes under the porous surfaces of the overspill car park is flawed as the car park will be flooded in periods of flooding up to 300mm meaning that any hydrocarbons ,oils,etc will be released into the floodwaters which will then by its hydrological link of the Afon Lliedi flow downriver to the SAC.  
The MOU recommends a cautionary approach and to refuse planning on this material consideration.

Why has the applicant not submitted an Environmental Impact Assessment for this application?

I trust that the reasons given are sufficient for the application to be called for a decision by the Minister.

Yours sincerely,

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