

Further Written Statement: Carmarthenshire LDP Examination 2024

Our ref 61721/02/GW/JC
Date 17 September 2024
To Corinne Sloley (Programme Officer)
LDP Examination for Carmarthenshire 2024
Place and Infrastructure
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From Owain Nedin
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Subject ID: 5473 – Further Written Statement for Hearing Session 1

1.0 Introduction

- 1.1 The following further written statement has been made on behalf of Seasons Holidays PLC (representor ID 5473), who have made previous representations to the emerging Carmarthenshire LDP both in March 2023 (to the Second Revised Carmarthenshire Deposit LDP (2018-2033)) and March 2020 (to the first Deposit LDP).
- 1.2 Seasons Holidays PLC have been invited to make a Further Written Statement in relation to the following hearing sessions:
- Hearing Session 1: Opening, Plan Preparation and Strategic Framework
 - Hearing Session 4: Prosperous people and Places – Employment and the Visitor Economy
 - Hearing Session 12: Prosperous People and Places – Site Allocations (Cluster 6 – St Clears and Pwll Trap)
- 1.3 The representations made to the previous deposit plan consultations contain our client's comments in full. The following statement is therefore short and focuses only on matters of clarity in respect of the specific questions asked by the Inspectors – and assumes original representations will be considered in full.
- 1.4 This written statement relates to Hearing Session 1: Opening, Plan Preparation and Strategic Framework.

2.0 Hearing Session 1: Opening Plan Preparation and Strategic Framework

Question 21: Are the Plan's objectives SMART and capable of delivering on the identified Vision?

- 2.1 The Draft LDP promotes tourism development through Strategic Objective 13 (SO13). However, draft allocation ref: SEC20/MU1 (at Dylan Coastal Resort) is the only tourist accommodation led allocation in the Plan.
- 2.2 The promotion of the expansion of Dylan Coastal Resort was supplemented by a second phase, enabling additional development. Failure to allocate Phase 2 (see representation to Matter 12 for further detail), or any other tourism accommodation development in the Deposit Plan, means meeting SO13 will be reliant on windfall development, considered under draft Policy VE1-VE4. In this regard, draft Policies VE1-VE4 are not sufficiently positive.
- 2.3 The Phase 2 expansion at Dylan Coastal Resort has been demonstrated as being deliverable, as set out in representations to Deposit Plan 2, and should have also been included in the draft allocation to provide support to the aspirations of the Plan and SO13.

Question 24a: What is the purpose of the Settlement Hierarchy? Will it guide new development to the most sustainable locations, and is it clear what types and amount of development, other than housing, will be appropriate in each tier of the hierarchy?

- 2.4 Dylan Coastal Resort, which is subject of draft allocation SEC20/MU1 (expansion of tourist accommodation), is located in Cluster 6 ('Western Carmarthenshire', defined at paragraphs 10.30-10.33 of the 2nd Deposit LDP). Immediately adjacent to Laugharne settlement boundary. However, aside from recognising that Western Carmarthenshire 'has a strong tourism offer' (para 10.32) there is no explicit support for tourism led development in this cluster area.
- 2.5 The hierarchy should, especially where specific allocations are proposed and existing clusters are present, be clear in its support for appropriate sectors of growth, beyond housing. It should also recognise that tourism development in particular may be located in lower order settlements due to the nature of the use.

Question 13: Are the requirements of Policy SD1 clearly expressed and consistent with the requirements of national planning policy? and are the defined settlement boundaries flexible enough to allow the anticipated level of growth to be delivered?

- 2.6 The existing Dylan Coastal Resort and proposed phase 1 expansion land (captured by draft allocation ref. SEC20/MU1) should be included within the defined settlement boundary of Laugharne. There is no logical reason for its exclusion, as expanded on in representation to Deposit Plan 2.