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By Email: LDPExamination@carmarthenshire.gov.uk

C/O Corinne Sloley
LDP Programme Officer
Carmarthenshire County Council
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Civic Offices
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Dear Sir / Madam,

CARMARTHENSHIRE COUNCIL LOCAL DEVELOPMENT PLAN EXAMINATION

**RESPONSE TO MATTERS AND ISSUES – MATTER 4: PROSPEROUS PEOPLE AND PLACE –
EMPLOYMENT, THE VISITOR ECONOMY AND INFRASTRUCTURE**

Please find enclosed, on behalf of, and under instruction from the landowner and promoting party (Datblygau Davies Developments Ltd.) a submission to the Examination of the Local Development Plan (LDP) in relation to ref. AS2/034001 : Land at Former Penybont Farm, Cwmann.

This submission comments on matters and issues raised by, and set out in, the Inspectors' Matters and Issues Agenda to cover Matter 4: Prosperous People and Places – Employment, the Visitor Economy and Infrastructure.

We look forward to attending the Hearing Session in respect of the matter above in due course. In the meantime, we hope and trust that all is in order with the submission. Please do not hesitate to contact us in the event that further information is considered beneficial.

Yours sincerely,

Geraint John
Director
Geraint John Planning Ltd

PREFACE

This submission relates to the matters and issues raised by, and set out in, the Inspectors' Matters and Issues Agenda to cover Matter 4: Prosperous People and Places – Employment, the Visitor Economy and Infrastructure.

Each of the relevant issues raised in relation to the above matters are considered in detail below.

This Submission

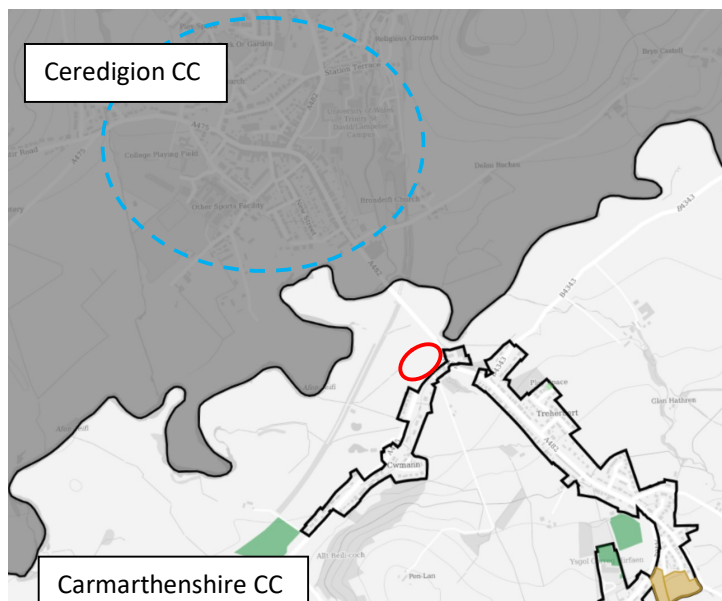
It should be noted that these submissions do not respond to every question raised within the Inspector's Agenda, as not all of these questions necessitate a response by us, and/or earlier submissions made on behalf of the Landowner/Promoting Party (Representor ID. 5791) are considered sufficient to address the matters raised. Accordingly, these representations only provide responses to questions where it is considered necessary and relevant to do so.

For clarity, please note that we have not responded to the following questions/issues identified under Matter 4:

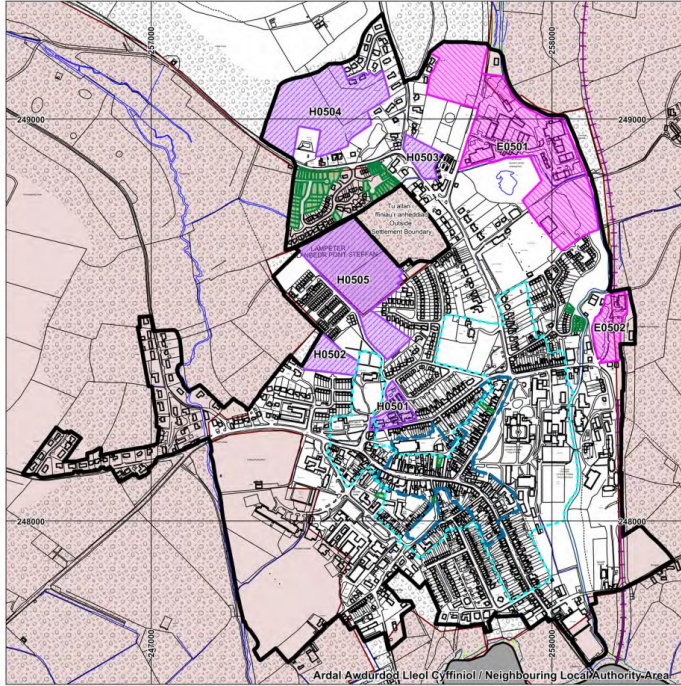
- Question 6: Sites allocated under Policy SP6
- Question 7: (Parts B and F)
- Question 8: Policy EME1
- Questions 11-15: Visitor Economy & Equestrian Related Development
- Question 16: Infrastructure

The site in context

At the outset it should be appreciated that the site is cuspal in terms of its location in regard to Local Authority Boundaries. As can be seen in the plan extracts below, the site is situated on the very North-Western Fringe of Carmarthenshire, whereby it has a strong cross boundary relationship and role/setting with Ceredigion. Accordingly, the site functions as much a part of Lampeter and Ceredigion CC as it does with Carmarthenshire.



Carmarthenshire LDP Proposals Map Extract (Site Location Circled in Red and Lampeter in Blue)



Ceredigion LDP Proposals Map Extract (Lampeter)

As can be seen above, there is considerable housing growth planned for Lampeter in the Ceredigion LDP Proposals Map (Purple shaded areas H0...). These new dwellings would undoubtedly be supported by new retail facilities in Cwmann given the close cross-border relationship, not only in terms of retail provision, but also in employment opportunities as a number of jobs would be created. As such, the site promoter is of the view that this cross-border relationship has not been fully considered as this would support the allocation of the site in the RLDP.

QUESTIONS

Issue - Is the economic strategy coherent and based on a clear and robust preparation process? Will it address the Issues and Strategic Objectives effectively and efficiently? Are the policies realistic and appropriate in the light of relevant alternatives and are they based on robust and credible evidence?

Employment

1. Is the Housing and Economic Growth Report based on robust and credible evidence? And are the findings sufficient to inform the Plan's economic strategy?

Focusing on the Economic Growth elements of the report, a response to question 1 is set out below.

The economic growth prediction of 354 jobs per annum over the lifetime of the Plan (i.e. 15 years, from 2018-2033) is based on 'Three baseline forecasts, from each of the leading forecasting houses' using historic trend data and previous evidence-based studies. (Housing and Economic Growth Report Paragraph 6.6). This projects an overall job creation estimate of 5,310 over the LDP period 2018-2033.

Whilst the Deposit Plan has not set out a target for employment growth and job creation, the report prepared by Turley does not necessarily provide sufficient data for future job growth prediction, given that the evidence provided is based on past trends and 'earlier evidence-based studies' as opposed to

any new studies and information. Accordingly, it is considered that the predictions are aspirational, and therefore, sound and deliverable employment sites must be allocated in the Plan in order to help ensure this figure is met over the Plan period.

It is acknowledged that in order to deliver additional jobs over those outlined above, the report acknowledges that the baseline had been adjusted to 'account for known and/or plausible investments that are likely to come forward and generate additional jobs in the coming years'. Whilst this is not guaranteed, such an investment-led growth scenario is supported, as it will ensure that the Plan can deliver the anticipated job growth projections throughout the Plan period and is resilient and adaptable in the event of any unforeseen circumstances or issues.

Given the above, the site promoter is of the view that the Economic Growth Report is not based on robust and credible evidence, as it is lacking in terms of providing sufficient detail as to how job growth predictions will be met. That said, an investment-led growth option would be supported in the event this leads to deliverable employment sites such as the Land at Former Penybont Farm, Cwmann, being brought forward.

2. What are the key drivers for change in Carmarthenshire's employment market? And how has the Plan addressed these considerations?

The provision of new housing is considered to be one of the key drivers for change in Carmarthenshire's employment market. For example, housing growth will inevitably lead to population growth and demand for jobs, which will increase the need for a wider employment market.

In the case of Cwmann, Appendix 7 of the 2nd Deposit Plan identifies that Cwmann is allocated more housing than other settlements in the same cluster – which infers that the settlement is considered to be sustainable and can support growth. This includes 30 units of housing which are currently allocated. These allocations are not supported by any new employment land which would provide for future residents.

Cwmann	Land south of Cae Coedmor	SuV37/h2
	Land adjacent to Lleinau	SuV37/h3

2nd Deposit RLDP Extract

Accordingly, it is not considered that the plan has addressed this 'key consideration', and that the site should be allocated as employment land to support the already allocated growth in the settlement. Likewise, it is considered that retail/commercial use would be most suitable for the site – given the site lies within a flood risk zone which discounts it from being suitable for housing, not least as part of the land already has an extant permission for retail units (as per permission ref. PL/05898 – Appendix A).

Furthermore, and as noted previously in this statement, the site is also in close proximity to Lampeter whereby its development would play a key role in supporting the wider community there in addition to resident's and visitors of Cwmann. As such, it is considered that greater merit should be attributed to this position given that it would strengthen the cross-border relationship between Carmarthenshire and Ceredigion.

3. How many new jobs are estimated to be created as a consequence of the Plan's economic strategy? And in what sectors?

The deposit plan identifies that the plan's economic strategy will create 353 jobs per annum with 5,295 created over the 15-year plan period. This will primarily be in the agricultural and manufacturing sectors, as outlined in the Housing and Economic growth report prepared by Turley.

Furthermore, despite retail comprising a high percentage of the job share within the county at present (under the combined the sector of wholesale, retail, transport, hotels, and food) it is also predicted to decline due to mounting pressures on the industry as explained in the Housing and Economic Growth Report. This is detrimental to the county as a whole, given that it clearly forms a key point of employment which supports both urban and rural areas.

Given this, it is considered that the land at Penybont Farm should be allocated as employment land in the RLDP, not least given both its acceptability and deliverability, but also the lack of retail growth identified in the Housing and Economic Growth report, and that the proposals would help support the rural community of Cwmann. Moreover, an allocation would equally support Lampeter given it's close proximity, particularly when the significant housing allocations come forward.

4. What is the cross-border employment relationship? What proportion of the existing jobs within Carmarthenshire are filled by employees from outside the County?

A joint response to questions 4 and 5 is provided below.

5. How many of Carmarthenshire's residents travel to work outside the County? And how has this movement been accounted for in its employment forecasts?

The 2nd Deposit RLDP clearly identifies that there is a close cross border employment relationship between Carmarthenshire and adjoining authorities. For example, paragraph 10.21 recognises the role that settlements such as Llandysul and Lampeter play to wider communities in the area, which support settlements in western Carmarthenshire.

In the case of Cwmann, the close cross-border employment relationship is supported given that additional employment provision would support not just local needs, but those in nearby settlements – such as Lampeter (where a short commute to work/travel for services would be possible). Accordingly, whilst some jobs would likely be filled by those outside of Carmarthenshire should the land at Penybont Farm come forward, this would support wider objectives at a national scale, as identified in Future Wales where it is stated on page 104 that '*It is essential that Strategic Development Plans are shaped by and are responsive to the relationship between regions...*'.

Furthermore, the Housing and Economic Growth Report (November 2022) identifies that Carmarthenshire has a net 'out-commute' with '1.09 resident workers per job' within the authority. This has been accounted for in the employment forecast and is not raised as an issue within the report, however the overall job growth identified is dependent on population growth with the county needing additional 16,407 persons over the plan period to meet it's target, as per paragraph 5.18. As such, additional employment opportunities within Carmarthenshire are considered crucial to ensure the targets are met.

7. Is the level of employment land provision identified in Policy SP7 appropriate?

a) How has the overall figure of 71.21 hectares been derived? Is the level of employment land provision fully justified and supported by robust and credible evidence?

c) Is the hierarchy of employment sites appropriate and consistent with the requirements of national planning policy?

d) What is the Plan's strategy for the distribution of employment land? Does it have regard to the requirements of Future Wales – The National Plan and other regeneration initiatives?

e) Are all the sites allocated in Policies SP7 and EME3 intended to be developed for B1, B2 and B8 purposes only? If not, should the policies be amended to make clear the other intended / potential use(s)?

A joint response to all relevant parts of question 7 is set out below.

The employment land provision figure of 71.21 hectares over the lifetime of the Plan (i.e. 15 years, from 2018-2033) is based on sustainable growth, '*allocating employment land in sustainable locations which accord with the sustainability principles of the plan*' and seeking to '*achieve a balance between fulfilling the requirements of Technical Advice Note 23 on Economic Development (February 2014), whilst placing a strong emphasis on flexibility, realism of sector growth and ability to meet demand at a regional scale*' (The 2nd Revised Deposit Plan, para. 11.143). The figure has been derived from the Two-County study (in conjunction with Pembrokeshire Council) supplemented by market and employer evidence (The 2nd Revised Deposit Plan, para. 11.142).

Whilst the employment land projections are based on sustainable growth and achieving the requirements of TAN 23, it is considered that further contingency land should be allocated in the event allocated sites do not come forward, particularly should there be issues with the larger strategic sites – such as Pentre Awel or Yr Egin. Given that the 71.21 hectare figure is aspirational, as outlined above, sound and deliverable sites such as the Land at Former Penybont Farm should be allocated to ensure the figure is met over the plan period – especially where they have proven to be acceptable with both historic and or extant permissions.

Furthermore, it is considered that hierarchy of employment sites is appropriate and consistent with the requirements of national planning policy and the site promoter is supportive of this being included within the 2nd Deposit RLDP. Planning Policy Wales 12 (Paragraph 3.50) advocates that a '*broad balance between housing, housing, community facilities, services and employment opportunities in both urban and rural areas should be promoted to minimise the need for long distance commuting (GJP Emphasis)*'. The 2nd Deposit RLDP accords with this, in that Policy SP 7 supports '*small scale sustainable employment developments and enterprises in lower tiered settlements*'. This would align with the development proposals for the Land at Former Penybont Farm, given that this is a small scale employment development within, and related to, the tier 3 settlement of Cwmann. Moreover, the site has the benefit and advantage of being well located close to the cross border Urban Service Centre and main settlement of Lampeter.

In addition, and in regard to Policies SP7 and EME3, it is noted that allocated employment sites appear to only support proposals for B1, B2, and B8 uses. This is not considered to be sustainable given that this neglects the identified need for new retail (A1) and 'trade counter' provision in the Housing and Economic Growth Report (Turley 2022). This is particularly the case given that this is predicted to decline over the plan period. Accordingly, the site promoter is of the view that these policies should be amended to include A1 use, and/or that separate sites for A1 use should also be allocated.

9. What is the purpose of Policy EME2? Does it apply to development in rural and urban areas?

The purpose of Policy EME2 is that it supports sustainable employment growth by expanding and/or enhancing existing employment locations which are already deemed acceptable by the LPA. Whilst the site at Former Penybont Farm has not been fully developed, as outlined above, it has an extant permission for employment (retail) use which could be built out at any time. Moreover, it has the advantage of being positioned such that it both provides rural employment (relative to Carmarthenshire) and more 'urban fringe' employment (relative to Ceredigion CC).

Accordingly, policy EME2 is supported as the proposed allocation of a wider parcel of land within the site promoter's ownership would be supported by this policy in the event the extant permission is realized and 'built out'. Given the nature of the use, it would not give rise to environmental damage – as evidenced under permission ref. PL/05898, where the wider land subject of this proposed allocation was also surveyed and assessed. Likewise, it is not considered that such a development would prejudice any other redevelopment proposals.

10. Is the approach taken in Policy EME4 to employment development on nonallocated sites within and outside development limits, clearly expressed, sufficiently flexible to respond to changing circumstances, and consistent with national planning policy?

Notwithstanding our case and position that the site warrants and merits a specific allocation in the plan, Policy EME4 is supported and considered sufficiently flexible to remain consistent with national planning policy. This is because it enables the provision of employment sites outside of defined settlement limits which will contribute to the predicted employment growth of the region as identified in the Housing and Economic Growth Report (Turley 2022). The proposals for the land at Former Penybont Farm are considered to align with the requirements of Policy EME4, given that they are directly related to the settlement of Cwmann and are considered to be of an appropriate scale, size and design, (acknowledging that further details would be provided within a full planning application, should the site be allocated). For this reason, it is considered that the site equally suited to, and appropriate for, a specific retail/employment allocation within the plan.

Likewise, it is noted in the amplification text of Policy EME4 that not all employment proposals will be appropriately accommodated on allocated employment sites (2nd Deposit RLDP Para 11.163). As such, this highlights the importance of the Policy in bringing forward additional non-allocated sites in both urban and rural areas, to enable economic opportunities,. It also emphasises the importance of sites such as Former Penybont Farm being developed to meet the predicted job growth figures of 353 per annum over the plan.

Accordingly, in order to meet local and regional needs, it is considered that further provision for employment should be made available in the employment land supply within the authority. Specifically, the site at 'Land at Former Penybont Farm, Cwmann' is considered to represent an optimal and sound solution to deliver employment in this location / area of Carmarthenshire (and by association Ceredigion CC), as evidenced by its historic planning permissions, and the existing extant permission for A1, B1, B2 and B8 uses (which can be found in Appendix A).