

Planning Department
Carmarthenshire Council
County Hall,
Castle Hill,
Carmarthen,
SA31 1JP

Date: 14 April 2023

Our ref: 61721/02/GW/26424009v3

Carmarthenshire 2nd Deposit Plan Representations: Dylan Coastal Resort

This letter has been prepared on behalf of Seasons Holidays plc in response to the Second Revised Carmarthenshire Deposit LDP (2018 – 2033) consultation which is inviting responses until 14th April 2023. This letter concerns land owned by Seasons Holidays plc which includes the existing Dylan Coastal Resort and adjoining land, which is detailed in the plan in Appendix 1.

Seasons Holidays Plc made representations in March 2020 to the first deposit LDP which sought the 'mixed-use' allocation of the land adjoining Dylan Coastal Resort to enable the delivery of an extension to the existing park consisting of high quality visitor accommodation alongside ancillary leisure uses, recreation space and a new principal access road.

Following the representations made in 2020, Seasons Holidays plc welcomed the report made to the County Council in January 2021, that presented the proposed focused changes to the Deposit Plan and which included the proposed allocation of part of the expansion land to the east of the existing Dylan Coast Resort (Phase 1 expansion). Seasons Holidays welcomes the subsequent formal inclusion of phase 1 expansion as a mixed use allocation through draft Policy SeC20/MU1, within the second Deposit Plan. However, they are disappointed to see that Phase 2 of the proposed expansion has not been included within the second Deposit Plan.

As a result, Seasons Holidays have instructed Lichfields to prepare representations to the second Deposit Plan on their behalf, objecting to the failure to allocate phase two. Ultimately, the decision not to allocate phase 2 is not supported by credible evidence, it means that the Plan fails to contribute to the achievement of sustainable development, does not have sufficient flexibility and will fail to be effective. The Second Deposit Plan is neither appropriate nor will it deliver and as such will fail to meet the tests of soundness set out by The Planning and Compulsory Purchase Act 2004 and as detailed by the Local Development Plan Manual.

It is also noted that the draft criteria based policy in respect of tourism has changed very little since the first deposit draft LDP. Whilst these policies are supportive of investment in tourism at a strategic level the detailed policy is less supportive and should be redrafted in a more positive light to

encourage investment in the visitor economy, given its strategic importance to Carmarthenshire (Draft policies VE1-VE4).

Seasons Holidays and Dylan Coastal Resort

Seasons Holidays have been operating for over 30 years, providing high quality and high end luxury holiday accommodation in 10 venues globally, employing over 550 staff across their resorts.

The Company began in Laugharne (Dylan Coast Resort), which lies immediately adjacent to the existing Laugharne settlement, outside of the existing development limits. Adjacent to the existing site is an area of vacant farm land (as shown in the plan in Appendix 1) which has recently been brought into the ownership of the Estate.

Dylan Coastal Resort, including the additional land, is bounded to the north by agricultural land. To the east and south of the site lies the Carmarthen Bay estuaries Special Area of Conservation (SAC) and the Taf Estuary Site of Special Scientific Interest (SSSI). To the west is the settlement of Laugharne Town and further agricultural land.

At Dylan Coastal Resort, Seasons Holidays plc have undertaken a series of improvements, refurbishments and new build projects over the last 5 years, under outline planning permission (W/24265), including a new central facilities building which houses a restaurant and spa and up to 100 new and refurbished lodges. In combination, the work has resulted in c. £30million of investment in the estate and the creation of 50 new jobs. Seasons Holidays Plc continues to deliver on the planning permission it's estimated upwards of £30million will be spent in the next 3 yrs.

Dylan Coastal Resort is the only significant site of luxury holiday lodge accommodation in Carmarthenshire that offers this form of high-end, all-year-round visitor accommodation. In fact, in the eyes of Landal Green Parks/Hoseasons, the biggest booking agent in Europe for self-catering higher end holiday accommodation, it ranks as one of the premier visitor accommodation locations in the entire UK and no. 1 in Wales – with a scope to attract guests from all over Europe:

“We are incredibly excited to be partnering with Dylan Coastal Resort and to have it as part of our Landal GreenParks/Hoseasons portfolio. Landal/Hoseasons offer over a hundred of some of the best resorts across Europe, and Dylan represents the first of a next generation of holiday resorts; that offer amazing luxurious accommodation, set in breathtaking surroundings, with first class facilities, and underpinned by a real focus on guest experience to ensure guests have an unforgettable holiday here in the UK.

The Landal/Hoseasons philosophy is very much about holidaying in the heart of nature, but also the local area itself and its important that guests can go and explore the local area as part of their overall holiday experience. Dylan Coastal Resort is blessed with an abundance of activities and places to see locally, to help guests have an amazing holiday experience. We hope the addition of more holiday lodges for rent brings real economic value to the local area by allowing us to send more guests to the resort.

In our opinion, Dylan Coastal Resort is one of the top three resorts in Europe and really puts this part of Wales on the map, making it a destination of choice not just to guests from the UK, but from across Europe.”

Paul Hardingham, Managing Director, UK, Landal GreenParks

Dylan Coastal Resort Allocation - SeC20/MU1

On March 25 2020, the applicant made representations to Carmarthenshire County Council Deposit LDP (2018-2033) consultation, in particular requesting the inclusion of land adjacent to Dylan Coastal Resort as an allocation within the Plan for additional tourism accommodation and facilities (see Appendix 2). Officers presented the consultation responses at the County Council meeting on 13 January 2021, including proposed modifications ('Focused Changes') to the Deposit Plan. Among the proposed Focused Changes was the allocation of phase 1 of Dylan Coastal Resort expansion (see plan in Appendix 3 for details of phase 1 and phase 2).

This amendment, allocating phase 1 of Dylan Coastal Resort, has been reflected within the second revised deposit LDP with the site now allocated under policy SG1, as site SEC20/MU1. The allocation also includes the existing Dylan Coast Resort. The inclusion of the land within the Plan and officer's recognition of the clear contribution that the Resort has and can continue to have to the year round tourism and the local economy in Carmarthenshire is welcomed by Season Holidays plc. Phase 1 could deliver in the region of 100 holiday accommodation units.

However, the land constituting phase 2 of the proposed expansion of Dylan Coastal Resort was not included within the proposed allocation, due to concerns over the ability to deliver the site within the plan period. Despite this, when reporting to Council, officers did not challenge the principle of development of phase 2 of the site and it was noted that under the proposed policy adopted within the new LDP (and not amended in the Second Deposit Plan) the subsequent phase would be considered against emerging policy. The report to Council stated:

"...the Plan will be amended to include Phase 1 (to be delivered during the Plan period) as identified within the representation. The remainder of the site as identified within the representation is subject to a longer term deliverable aspiration.

As such there is no certainty on its delivery and will not be included within the Plan. The policy framework set out within the revised LDP allows the potential development for tourism and the visitor economy where it is appropriately located. Any proposal submitted will be considered against the revised LDP policies."

Phase 2 would comprise of c. 160 units of accommodation alongside a range of ancillary leisure and recreational facilities (see appendix 4 for further details)

Seasons Holidays Plc object to the non-inclusion of the second phase of Dylan Coastal Resorts expansion, particularly in relation to the reasons stated by the officer for its non-allocation which are:

- 1 Ability to deliver within the Plan Period;
- 2 Certainty of deliverability of the Phase; and
- 3 Policy framework being sufficient to enable tourism development.

1. Ability to Deliver Phase 2 within the Plan Period

Seasons Holidays Plc were granted outline permission for the delivery of 212 holiday lodges and 48 serviced apartments in 2012 (ref: W/24265). Since this time, a number of reserved matters applications have been granted in relation to the delivery of parcels of land associated with development of the resort, the most significant of which enabled the delivery of phases C to E in 2017 (ref: W/34546). Since the approval of the RM, approximately 100 units have been delivered on site (or part delivered) alongside a fully operational clubhouse spa.

The current rate of development has seen approximately 3 lodges delivered a month over the period of September to April (off peak). At this rate, it is anticipated that the remaining 40 lodges within the planning permission would be delivered and installed on site by the end of 2024.

To ensure that the site did not have a supply issue, work on Phase 1 (the current draft allocation) would have to begin before all units were delivered on the original site, to allow for a smooth transition (i.e. enabling works would have to begin and be completed in the final year of works to the original permission). Of the anticipated 100 units delivered in phase 1, at a similar delivery rate of c. 25 per year (commencing in 2024), Phase 1 would be fully delivered 4 years later, by 2028.

Working on the same assumption, Phase 2 would have to commence development in 2027, to enable the site to begin the delivery of units once phase 1 was complete. This build out process would then continue for the next six to seven years, with the first lodges on Phase 2 available from 2028. What is clear is that planning permission for phase 2, and the first delivery of units on site would have to commence well within the Plan period (i.e. by 2033) and indeed the entire Phase 2 development would largely be complete within the Plan period.

Given the track record of the delivery of the reserved matters applications on site, there is clear evidence to support the view that Phase 2 will commence before the end of the Plan period and, despite the comments of officers in their report to Council that this is an aspiration without certainty, the development will come forward.

It is considered that the non-allocation of phase 2 of Dylan Coastal Resort will impact on the operators ability to expand during the Plan period to meet the needs of the market. In turn, this will mean that the Council will fail to capitalise on an opportunity to deliver on their own Strategic Objectives (as set out in point 3 below).

2. Certainty of Delivery

Seasons Holidays Plc have so far invested £30million into Dylan Coastal Resort. As a well-established, UK based business managing 10 luxury resorts both in the UK and overseas, Seasons Holidays have a proven track record of investing and optimising their parks. The expansion of Dylan Coastal Resort to date demonstrates more than anything else their commitment to the area and their ability to deliver on a planning approval and with it create substantial benefits for the local economy. Indeed, as is presented in Lichfields study within Appendix 5, the delivery of Phase 1 and 2, would amount to the following benefits:

Phase 1:

- c. 110 direct (plus c. 120 indirect spin off) jobs during construction

- £5.9 million of direct GVA generated per annum through construction (plus £7.1 million indirect)
- £1.8 million in direct (on and off site) spending (by guests) per annum;
- £0.8 million in indirect spending per annum;
- c. 33 new direct jobs (and c. 16 indirect job) during operation; and
- Operation GVA of £1 million per annum.

Phase 2:

- c. 118 direct (plus c. 130 indirect spin off) jobs during construction
- £6.4 million of direct GVA generated per annum through construction (plus £7.7 million indirect)
- £3 million in direct (on and off site) spending per annum;
- £1.4 million in indirect spending per annum;
- c. 53 new direct jobs (and c. 25 indirect job) during operation; and
- Operation GVA of £1.6 million per annum

The Council consider that Phase 2 could not be delivered – however have offered no evidence to support their position.

The Development Plan Manual (DPM) sets the guidelines for the appraisal of potential sites to allocate within a local plan. These guidelines are set to ensure that any site included within a Plan can be relied upon for delivery within the Plan period and that the site is the most effective to meet the strategic objectives of the wider Plan. Paragraph 3.47 sets some high-level principles that each site should be scrutinised against at the candidate stage, these tests are written predominantly in relation to housing sites, however, can be applied in relation to visitor accommodation developments such as Dylan Coastal Resort. The key principles of a deliverable site, set out within across the DPM are:

A Deliverable Site:

- 1 Is the site in a sustainable location;
- 2 Is the site available now, or will be available at an appropriate point within the plan period,
- 3 Is the site generally free from physical constraints, such as land ownership, infrastructure, access, ground conditions, biodiversity, landscape, heritage, flood risk issues and pollution;
- 4 If the site is in public ownership is it identified in a published disposal strategy and/or through Council resolution if the land is to be retained/or sold by the Council;
- 5 What is the planning history and/or does it benefit from an extant planning permission, or is it identified as an allocation?
- 6 Where appropriate, a clear explanation and justification of how and when any barriers to delivery can be overcome should be identified.

The land in Phase 2 is a sustainable location, in so far as it immediately adjoins an existing Holiday Park (or planned extension to – i.e. Phase 1 allocation). It is under the ownership of Seasons Holidays and is available now and would be built out in accordance with the timeframes identified previously. It is free

from significant constraints, with no physical conditions that would prevent delivery. It is not in public ownership and whilst it has no formal planning history (other than a temporary access track provision to deliver lodges to the current development at Dylan Coastal Resort) it is currently proposed to lie adjacent to an allocated site for holiday accommodation.

To meet the test set out for a deliverable candidate site, no further justification is required, as there are no other barriers to delivery. On this basis there is no evidence to support the decision not to include it within allocation ref: SEC20/MU1.

3. Policy framework being sufficient to enable tourism development.

Strategic Policy Context

Future Wales; the national plan 2040

Future Wales, the National Development Framework (NDF), sets out a direction of travel for growth in Wales, with an active support for the tourism industry, given its vital contribution to local economies. The Framework sets out 11 outcomes that are overarching ambitions of the NDF, of which outcome 6 is a direct requirement on Development Plans to have a:

“..forward thinking, positive attitude towards enabling economic development, investment and innovation. Increased prosperity and productivity will be pursued across all parts of Wales, building on current activity and promoting a culture of innovation, social partnership, entrepreneurialism and skills-development in sustainable industries and sectors. The culture, heritage and environment of Wales will play a positive, modern role in the economy by attracting the interest and expenditure of tourists, and providing a distinctive and trusted brand for Welsh businesses.” (pg. 55)

Policy 29 of the NDF, focuses on the region of Carmarthen and the Haven Towns, and identifies the very important role tourism plays in the local economy. Noting that Local Development Plans should support and facilitate growth of these activities:

“The South West supports a large and diverse tourism industry and the sector is important to the region’s economy. Opportunities to develop the visitor economy, to promote the world-class coastal areas and beaches and major leisure attractions should be explored. The national parks are a major asset for the region, attracting visitors from around the world. Strategic and Local Development Plans should consider the main existing and potential new tourism areas, the type of visitors they attract and the infrastructure required to support growth. They should provide a positive framework to enable growth and ensure that communities across all parts of the region are able to benefit from their landscapes, natural and historic environment, heritage assets and visitor attractions to support and grow their economies. It is important the region’s distinctive heritage is preserved and enhanced by high quality development.” (pg. 149-150)

The value and importance of tourism to Wales (and Carmarthenshire) and the need to plan effectively for it is at the heart of the Welsh Government’s strategic thinking.

Planning Policy Wales and the Technical Advice Notes

Planning Policy Wales

Planning Policy Wales 11th Edition (2021) (PPW), supplemented by Technical Advice Notes, sets out land use planning policies for Wales and provides a national planning policy framework for Wales. The primary function of the document is to ensure that “the planning system contributes towards the delivery of sustainable development and improves social, economic, environmental and cultural wellbeing of Wales”.

PPW, through a series of key themes, seeks to guide plan making and decision taking to meet its overall objectives. Among these themes is the ‘Productive and Enterprising Places’, which seeks to maximise the economic potential of Wales through placemaking.

This section of PPW acknowledges the important role that tourism plays in the Welsh Economy, reflecting the NDF. Tourism is integral in creating a resilient and more equal Wales as well as in supporting our vibrant culture and Wales’ distinctiveness (pg. 74).

PPW also puts a requirement on Local Planning Authorities to ensure that they are “capitalising on our distinctive tourism offer to promote Wales to the world, creating high quality jobs in this sector which enhance skills and provide employment year-round” (pg. 75)

Section 5.5 of PPW deals specifically with tourism. This section defines Tourism as being “vital to economic prosperity and job creation” (para 5.5.1) and emphasising that the planning system should “encourage tourism where it contributes to economic development” and support the continued success of existing tourist areas (para 5.5.2).

The section concludes by setting a clear direction to Local Authorities:

“Planning authorities should provide a framework for maintaining and developing well-located, well designed, good quality tourism facilities. They should consider the scale and broad distribution of existing and proposed tourist attractions and enable complementary developments such as accommodation and access to be provided in ways which limit negative environmental impacts as well as consider the opportunities to enhance biodiversity” (Para 5.5.6)

TAN 13: Tourism

Whilst approaching 25 years old, TAN 13 still provides additional guidance on tourism in support of PPW. The document broadly echo’s PPW, as well as the WSP and the NDF, highlighting the important role tourism plays. For example:

“It makes a major contribution to the Welsh economy, provides employment in a wide variety of occupations and can bring benefits to local economies and communities in urban and rural areas” (para 4).

The same Paragraph also notes that development plans can provide guidance on opportunities for large scale or innovative projects and/or appropriate facilities for the countryside.

TAN23: Economic Development

TAN 23 provides guidance in economic development principles more generally. It requires Local Authorities to prepare an economic vision in their Development Plan, as per para 4.3.1 below:

“In producing Local Development Plans, planning authorities are expected to develop a broad vision for their Plan which must be consistent and coherent so that the economic, social and environmental considerations support each other and point in the same direction. The economic vision must therefore be consistent with other aspects of the Local Development Plan such as housing and transportation. An economic vision is part of the LDP vision; it is not separate to it. The vision should also be consistent with the aims of other local authority strategies such as the Community Strategy and Single Integrated Plan...”

TAN 23 also requires that “Local planning authorities should recognise market signals and have regard to the need to guide economic development to the most appropriate locations, rather than prevent or discourage such development.” (para 1.2.5)

TAN 6: Planning for a Sustainable Rural Community

TAN 6 provides more specific guidance on how Local Authorities should plan for the prosperity of their rural communities. Tourism being one such enterprise that forms an important part of the rural economy. As per para 3.1.2, Local Authorities should support diversification, particularly where it creates local jobs and improves the local economy. The documents also note that when opportunities arise, Local Planning Authorities should support the expansion of existing businesses in rural areas including where they are located in the open countryside (para 3.1.3).

Carmarthenshire’s Corporate Strategies

At a local level, the strategy for growth in Carmarthenshire is set via a series of specific corporate strategies and plans.

Carmarthenshire’s Corporate Strategy (updated April 2021), sets the Councils overarching strategy for growth through a series of well-being objectives and should be used to guide the strategic objectives of the Development Plan. The Strategy, through well-being objective 6 ‘Live well – create more jobs and growth throughout the County’, sets a framework for promoting economic growth, opportunities for the workforce and investing in the infrastructure that connects the County to encourage tourism.

Further to the Corporate Strategy, Carmarthenshire has a Strategic Regeneration Plan (2015-2030). The Plan provides more detail on the growth objectives and strategies for achieving them. Tourism and the leisure industry feature highly within the regeneration strategy (pg 20), which employs 5,500 full time equivalent jobs throughout the County, noting that “A strong tourism industry and visitor economy will support a more prosperous economy overall and will help to sustain existing and create new jobs”.

The strategy sets out 5 key priorities to achieve economic growth in tourism as follows:

- i. Raising the profile of Carmarthenshire
- ii. Improving the tourism infrastructure
- iii. Enhancing the tourism experience

- iv. Enhancing the Sense of Place
- v. Invest in people

With the vision summarised as:

“To develop a prosperous visitor economy in Carmarthenshire based on its unique strengths and character, which generates higher spend and local income, enhances its image and reputation and improves the quality of life for local communities”

The strategy also identifies the Coastal Belt in Carmarthenshire (within which Laugharne sits), as being integral to the growth in tourism with the core objectives being:

“General increases in visitors; square footage; quality offerings and visitor spend are the main objectives along the belt.”

The focus on Tourism is working for the Council, with over £400m generated in the Carmarthenshire economy by tourist in 2021, with a 50% increase in economic impact on the preceding decade¹

Second Deposit Plan Policy approach

The Second Deposit Plan promotes tourism development through Strategic Objective 13 and Strategic Policy SP11. The policy supports development related to the visitor economy and acknowledges the very important role tourism plays in the economy of Carmarthenshire County. Despite this (and the clear national and strategic acknowledgement of tourism's importance) allocation ref: SEC20/MU1 (at Dylan) is the only tourist accommodation led allocation in the Plan and has been curtailed by the failure to promote phase 2. This amounts to an allowance, in the plan period, of c. 100 additional accommodation units in an industry that grew by 50% in the last 10 years. It is simply not sufficient to support objectives.

Failure to optimise the delivery of visitor accommodation, in a logical location, in the emerging Plan that is located on a deliverable site with a willing landowner and experienced operator means that the Plan is inconsistent with national Policy and its own Strategic growth objectives.

The policy that supports SP 11 (Policies VE1-VE4) set a series of requirements on tourism development proposals. The Policy is not positively worded and does not offer sufficient confidence or certainty that new visitor accommodation scheme (or extensions to existing) will be acceptable. It cannot be readily relied upon to deliver the growth required to meet SO13 and SP11, and therefore if Phase 2 is not allocated it significantly reduces the chances of it coming forward and will likely stifle the Plans ability to deliver on its objectives.

Conclusions on the failure to allocate Phase 2

As has been demonstrated above, there is a clear timeline for deliverability at Dylan Coastal Resort, which is based on current on site trends and the need to continue to deliver accommodation on site. This shows that planning permission for phase 2 would be secured within the current Plan period and

¹ <https://www.carmarthenshire.gov.wales/home/business/tourism/research-trends-development/#.ZBxfWXbP2U>

works on site would commence, including the erection of units. Furthermore, the land in question is deliverable, by an experienced holiday park operator which is fully invested in the area. There are no constraints to its delivery however there are considerable losses to the local economy should it not come forward.

Furthermore, failure to allocate would mean the Council would be forced to consider a planning application in due course for the development at Phase 2, within the Plan period. The policy, as currently drafted, is not sufficiently supportive to give certainty in investment if an overriding allocation is not first present. Failure to allocate is also a failure to support national policy objectives, leading to an inconsistency between the various levels of spatial policy in Wales.

All combined, the failure to include Phase 2 within allocation ref: SeC20/MU1, means the Plan would fail to meet its own strategic objectives for growth of the tourism industry, would not be supported by credible and robust evidence, would not be positively prepared nor sufficiently aspirational, it will fail to be effective nor will it be sufficiently flexible.

On this basis, it would fail to meet the test of soundness as set out in Development Plans Manual.

Extending the Development Limits of Laugharne

The proposed boundary of Laugharne is shown within the draft proposals map. It remains the same as the first deposit plan draft proposals map. The Development Limits boundary includes the existing built development of the settlement of Laugharne as well as the proposed new allocations for housing (3 x sites). The purpose of Policy (SD1), which guides Development Limits, is to prevent inappropriate development in the countryside; prevent coalescence of settlements and; to identify areas where development proposals would be permitted.

The existing Laugharne Park Estate, is not open countryside, does not border or close a strategic gap between settlements, and is an existing development site with extant and implemented permission for C1 use.

Dylan Coastal Resort operates much like a hotel, it has independent accommodation, to which you can be served meals, it has a reception, central hub including spa, and restaurant facilities and expansive open grounds. The fact the hotel accommodation is spread across the grounds rather than within one single building, does not make it a caravan park or static homes park. As a hotel use, it should logically be included within the development limits of that settlement in the same way that hotel uses adjoining settlements are elsewhere in the County.

The fact that the resort is not shown as being within the development limits makes the Plan inconsistent in how it treats main town centre uses. It limits further development that would assist economic growth at the site, meaning it would not be effective, and as a result should not be found sound.

Dylan Coastal Resort, as noted above, represents an entirely different form of accommodation to the usual static home holiday accommodation. It is a hotel spread across a larger site, which offers year round accommodation. It therefore is an entirely suitable use to be included within a development limits boundary in a service centre such as Laugharne. The modification proposed would therefore be sound.

Furthermore, as with the allocation, the boundary amendment provides additional certainty for the owners should they choose to invest further in Dylan Coastal Resort to improve facilities and create jobs.

Conclusion

Whilst the inclusion of phase 1 of Dylan Coastal Resort within the Deposit Plan is welcomed, Seasons Holidays Plc consider that the decision to exclude Phase 2 is unsound. The reasoned justification is not evidenced and the result is a Plan that fails to reflect and support national and local strategic objectives. The Plan also fails to be properly evidenced, justified or sufficiently flexible.

The evidence set out in this response demonstrates that Phase 2 is deliverable in the plan period and is required by the operators to meet demand in line with current growth. Dylan Coastal Resort is in the hands of an established and experience operator with a track record in delivering high quality, year round tourist accommodation. The expansion of Dylan Coastal Resort is estimated to generate up to £37 million in GDV (per annum) into the economy during construction and £2.6 million (per annum) during operation. Including creating c. 130 additional jobs during operation.

To leave such growth, investment and benefits to general development management policy when an option exists to secure certainty through allocation is not appropriate and the Plan fails to be positively prepared as a result. People and interpretation of policy change over time and as a result the reliance on these policies is not an effective means of delivering on such an important area of growth for the economy. It is considered that by allocating phase 2 of Dylan Coastal Resort, the revised Local Development Plan will be able to firmly secure both the speed and certainty of delivery of levels of tourism related investment in Carmarthenshire to reflect the strategic objectives within the Plan.

However, as drafted, the Second Deposit Local Plan does not adequately plan for growth within the tourism economy in Carmarthenshire as is specifically detailed as necessary by policy 29 of the National Development Framework, Future Wales 2040.

We therefore urge the Council, at this stage and before examination, to reconsider the allocation of Phase 2 at Dylan Coastal Resort and include it within SeC20/MU1.

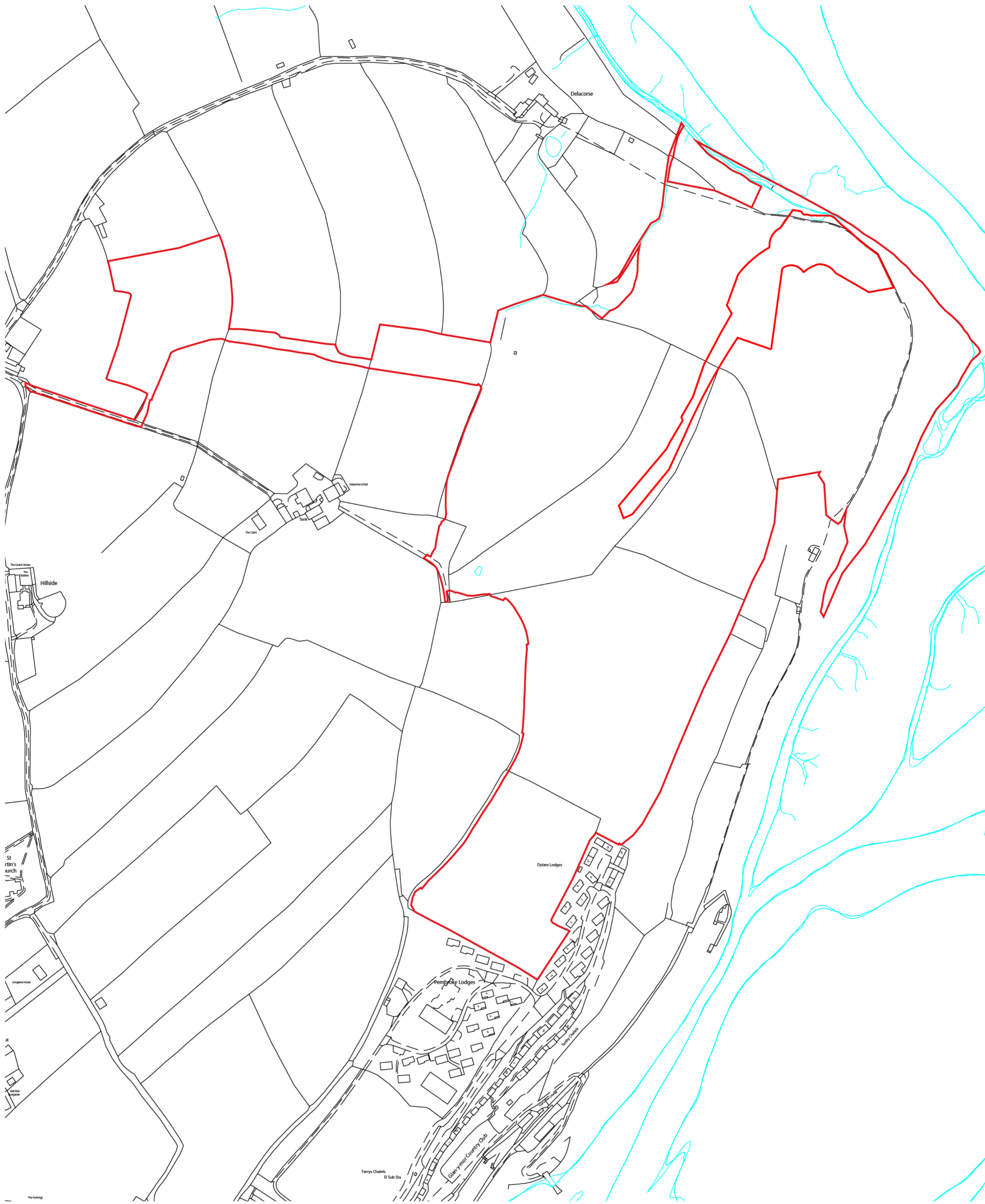
Yours faithfully



Owain Nedin
Planning Director

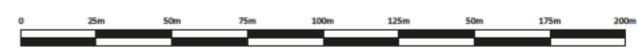


Appendix 1: Dylan Coastal Resort Land Ownership



Key

Extent of additional ownership



Project Laugharne Park

Title **Extent of Additional Ownership (DRAFT)**

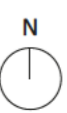
Client Seasons Holidays PLC

Date 28.02.20

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Drawn by SG

Drg. No. IL61676/01-001 RevB



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Appendix 2: Representations to Deposit LDP (March 2020)

Briefing Note

Our ref 61721/01/GW/HIk

Date 25 March 2020

**Subject Carmarthenshire Local Plan Review (Regulation 19)
Representations on behalf of Seasons Holidays plc (Laugharne Park Estate)**

1.0 Introduction

- 1.1 This statement has been prepared on behalf of Seasons Holidays plc in response to the Carmarthenshire Deposit LDP (2018 – 2033) consultation which is inviting responses until 27th March 2020. The Statement concerns land owned by Seasons Holidays plc which includes the existing Laugharne Park Estate holiday resort and adjoining land, which is detail in the plan in Appendix 1.
- 1.2 To date, no representations have been made by Seasons Holidays plc in respect of the land concerned with this submission or to any emerging policy. To date, the opportunity, particularly in respect of land ownership related to the proposed allocation, has not presented itself. However, representations are now being made at the deposit stage by Seasons Holidays plc as they have recently acquired the land to the north east of Laugharne Estate and opportunities present themselves to provide a policy background to support further investment into the high quality, year round visitor economy sector in Carmarthenshire.
- 1.3 These representations are seeking the allocation of the land adjoining Laugharne Estate for a mixed-use allocation which will include visitor accommodation alongside ancillary leisure uses, recreation space and a new principal access road.
- 1.4 We are also seeking for the development limits of Laugharne to be amended to include Season Holidays plc's operational site, Laugharne Park Estate.
- 1.5 Whilst the draft, criteria-based policy proposed within the deposit plan is broadly supportive of investment in tourism, in locations such as Laugharne, the policy alone does not provide sufficient certainty. The policy is open to interpretation and therefore fails to give the necessary comfort required for significant additional investment in Laugharne Park to allow it to reach its potential.
- 1.6 We consider that the Deposit Plan, in its present form will fail to meet the tests of soundness set out by The Planning and Compulsory Purchase Act 2004 and as detailed by the Local Development Plan Manual. In effect it fails to be consistent with other relevant plans, it fails to plan appropriately for the area and it will fail to meet its strategic objectives, thereby failing to deliver.

2.0 Seasons Holidays and the Laugharne Park Estate

- 2.1 Seasons Holidays have been operating for over 30 years, providing high quality and high end luxury holiday accommodation in 10 venues globally, employing over 550 staff across their resorts.

- 2.2 The Company began in Laugharne, and through its evolution, now employ up to 40 staff members, a number set to double on the opening of the Spa and a further 11 holiday homes all by June 2020.
- 2.3 At Laugharne, Seasons Holidays plc have recently committed to a significant level of financial investment in the shape of the aforementioned new club house, restaurant and spa facility, which along with the first phase of new and upgraded holiday accommodation resulted in c. £10million of investment. As the Estate continues to deliver on the planning permission it's estimated at least a further £20million will be spent in the next 3-5 years.

3.0 Laugharne Park Estate Site and operating Context

- 3.1 Laugharne Park Estate lies immediately adjacent to the existing Laugharne settlement, outside of the existing development limits. Adjacent to the existing site is an area of vacant farm land (as shown in the plan in Appendix 1) which has recently been brought into the ownership of the Estate.
- 3.2 Laugharne Park Estate, including the additional land, is bounded to the north by agricultural land. To the east and south of the site lies the Carmarthen Bay estuaries Special Area of Conservation (SAC) and the Taf Estuary Site of Special Scientific Interest (SSSI). To the west is the settlement of Laugharne Town and further agricultural land.
- 3.3 Laugharne Park Estate is the only significant site of luxury holiday lodge accommodation in the local area and indeed arguably the entire county of Carmarthenshire to offer this form of high-end, all year around visitor accommodation and ancillary leisure features such as the clubhouse spa, restaurant and swimming pool. The facilities are of the highest quality design and are available due to a major level of investment in the land by its owners, providing a significant boost to the visitor economy of Carmarthenshire.
- 3.4 The accommodation on site comprises 55 units, with the remainder of the consented 250 units to be constructed over the coming 3-5 years. The Offer is comparable to a hotel in terms of its operations, albeit, is over a wider site area rather than being contained within one building. The closest example in the UK would be the Soho Farm House, in the Cotswolds¹. Like a hotel you have your main bedroom living space accommodation, you can be served meals in your room or within the on-site restaurant and you can make use of the ancillary facilities during your stay.
- 3.5 The representations herewith concern the existing Laugharne Park Estate and the adjoining land.

Planning History

- 3.6 Laugharne Park Estate has several applications of relevance to our representations which are set out in [Appendix 2]. As evidenced by the planning history, the site has been operational for several years and has quickly expanded. Our client is targeting a completion of the latest development proposals, given outline consent in 2012 under application ref: W/24265 in the next 3 to 5 years.
- 3.7 The adjoining land shown within Appendix 1, has two applications of relevance. On behalf of our client we recently submitted two applications [ref: PP-08554971 and PP-08588818] for retrospective planning permission for the development of an access track to the north of the site which is currently being used for construction vehicles.

¹ <https://www.sohofarmhouse.com/house>

3.8 The existing site and adjoining land are not currently proposed by the Council to be allocated in the Draft Plan nor do they benefit from an allocation within the extant plan.

4.0 The Content of the Representations

4.1 Our representations can be sub divided into two categories. Both of which are dealt with in detail in the following pages.

- 1 We propose that the land adjoining the existing Laugharne Park Estate be allocated within the draft deposit Plan for tourism led, mixed use, development.
- 2 We proposed that the existing Laugharne Park Estate be included within an extended Development Limits for Laugharne Town.

4.2 Before each of the following points is considered in more detail, it is important to set out the Strategic context in respect of tourism and the economy in Wales and Carmarthenshire as well as the Test of Soundness as directed by the Planning and Compulsory Purchase Act 2004 and the Local Development Plan Manual 2015.

4.3 We also set out the proposed draft policy approach of Carmarthenshire Council in respect of tourism and economic development.

5.0 Test of Soundness

5.1 Details on the tests of soundness are provide by the Welsh Governments Local Development Plan Manual 2nd Edition (2015). The Document is under review and edition 3 is expected to be published shortly, however the test of soundness, particularly as far as these representations are concerned, is expected to remain broadly consistent.

5.2 The test of Soundness should be considered a high bar. The Plan, once adopted, will set a framework for development in a local area for a period of 20 years. It is important therefore that the Plan is robust, forward-looking and flexible enough to accommodate identified growth during its period. It must also accord with and assist in the delivery of the Strategy and Objectives of Welsh Government and the Local Council. Core to determining whether a plan is sound are the following matters.

- 1 Is the Plan consistent with other national and regional Plans and Strategies? i.e.
 - i Does it have regard for the Welsh Spatial Plan and Planning Policy Wales.
 - ii Does it accord with regional strategies and is it compatible the strategies within neighbouring authority plans?
 - iii Does it have regard to Well being goals of the Welsh Government?
- 2 Is the Plan appropriate? i.e.
 - i Does it address key local issues?
 - ii Does it reflect the Councils corporate and wellbeing strategy's?
 - iii Is it robust and properly evidenced?
 - iv Have real alternative been considered?
- 3 Will the Plan deliver? i.e.
 - i Are the strategic objectives deliverable?
 - ii Are the allocations realistic?

- iii Do the allocations allow for appropriate growth to meet need and aspirations?
- iv Is the plan sufficiently flexible?
- v Are reasonable and available opportunities taken to grow the economy?

6.0 Strategic Policy Context

Wales Spatial Plan (and Emerging National Development Framework)

- 6.1 The Wales Spatial Plan (2008) (WSP) sets out the spatial framework for growth across the whole of Wales. The WSP identifies a broad vision for growth through five overlapping themes. One of the themes, ‘Respecting Distinctiveness’ (Chapter 14), acknowledges the important role tourism and culture play both in the economy of Wales but also in community cohesion and individual wellbeing.
- 6.2 The WSP identifies the strategic importance of West Wales, and in particular the coastal regions (including Laugharne) as having a very important role to play in this part of the strategic vision, and important to the area’s future tourism offer (para 18.8).
- 6.3 In October 2019, the Welsh Government launched a consultation version of the Draft National Development Framework (NDF). The NDF will, once adopted, replace the WSP. Whilst only at an early draft stage and therefore afforded limited weight in our view, it is likely to become a more materially important document in due course and certainly during such time that this plan is scrutinised at examination. The direction of travel is therefore worth considering.
- 6.4 The NDF also identifies the important role tourism plays toward the Welsh economy, generating an economic output of £6.3 billion in 2018 alone. It sets out 11 outcomes that are overarching ambitions of the NDF, of which outcome 6 is a direct requirement on Development Plans to have a:
- “...forward thinking, positive attitude towards enabling economic development, investment and innovation. Increased prosperity and productivity will be pursued across all parts of Wales, building on current activity and promoting a culture of innovation, social partnership, entrepreneurialism and skills-development in sustainable industries and sectors. The culture, heritage and environment of Wales will play a positive, modern role in the economy by attracting the interest and expenditure of tourists, and providing a distinctive and trusted brand for Welsh businesses.”*
- 6.5 Once again, the value and importance of tourism to Wales and the need to plan effectively for it is at the heart of the Welsh Government’s strategic thinking and forms a key part in the future thinking also.

Planning Policy Wales and the Technical Advice Notes

Planning Policy Wales

- 6.6 Planning Policy Wales 10th Edition (2018) (PPW), supplemented by Technical Advice Notes, sets out land use planning policies for Wales and provides a national planning policy framework for Wales. The primary function of the document is to ensure that “the planning system contributes towards the delivery of sustainable development and improves social, economic, environmental and cultural wellbeing of Wales”.

- 6.7 PPW, through a series of key themes, seeks to guide plan making and decision taking to meet its overall objectives. Among these themes is the ‘Productive and Enterprising Places’, which seeks to maximise the economic potential of Wales through placemaking.
- 6.8 This section of PPW acknowledges the important role that tourism plays in the Welsh Economy, reflecting the WSP and NDF. Tourism is integral in creating both a resilient Wales and in supporting our vibrant culture and Wales’ distinctiveness (pg. 74).
- 6.9 PPW also puts a requirement on Local Planning Authorities to ensure that they are “capitalising on our distinctive tourism offer to promote Wales to the world, creating high quality jobs in this sector which enhance skills and provide employment year-round” (pg. 75)
- 6.10 Section 5.5 of PPW deals specifically with tourism. This section defines Tourism as being “vital to economic prosperity” (para 5.5.1) and emphasising that the planning system should “encourage tourism where it contributes to economic development” (para 5.5.2).
- 6.11 The section concludes by setting a clear direction to Local Authorities:
- “Planning authorities should provide a framework for maintaining and developing well-located, well designed, good quality tourism facilities. They should consider the scale and broad distribution of existing and proposed tourist attractions and enable complementary developments such as accommodation and access to be provided in ways which limit negative environmental impacts as well as consider the opportunities to enhance biodiversity” (Para 5.5.6)*
- TAN 13: Tourism*
- 6.12 Whilst approaching 25 years old, TAN 13 still provides additional guidance on tourism in support of PPW. The document broadly echo’s PPW, as well as the WSP and the NDF, highlighting the important role tourism plays. For example:
- 6.13 “It makes a major contribution to the Welsh economy, provides employment in a wide variety of occupations and can bring benefits to local economies and communities in urban and rural areas” (para 4). The same Paragraph also notes that development plans can provide guidance on opportunities for large scale or innovative projects and/or appropriate facilities for the countryside.
- TAN23: Economic Development*
- 6.14 TAN 23 provides guidance in economic development principles more generally. It requires Local Authorities to prepare an economic vision in their Development Plan, as per para 4.3.1 below:
- “In producing Local Development Plans, planning authorities are expected to develop a broad vision for their Plan which must be consistent and coherent so that the economic, social and environmental considerations support each other and point in the same direction. The economic vision must therefore be consistent with other aspects of the Local Development Plan such as housing and transportation. An economic vision is part of the LDP vision; it is not separate to it. The vision should also be consistent with the aims of other local authority strategies such as the Community Strategy and Single Integrated Plan...”*
- 6.15 TAN 23 also requires that “Local planning authorities should recognise market signals and have regard to the need to guide economic development to the most appropriate locations, rather than prevent or discourage such development.” (para 1.2.5)

TAN 6: Planning for a Sustainable Rural Community

- 6.16 TAN 6 provides more specific guidance on how Local Authorities should plan for the prosperity of their rural communities. Tourism being one such enterprise that forms an important part of the rural economy. As per para 3.1.2, Local Authorities should support diversification, particularly where it creates local jobs and improves the local economy. The documents also note that when opportunities arise, Local Planning Authorities should support the expansion of existing businesses in rural areas including where they are located in the open countryside (para 3.1.3).

Carmarthenshire’s Corporate Strategies

- 6.17 At a local level, the strategy for growth in Carmarthenshire is set via a series of specific corporate strategies and plans.
- 6.18 Carmarthenshire’s Corporate Strategy (June 2019), sets the Councils overarching strategy for growth through a series of well-being objectives and should be used to guide the strategic objectives of the Development Plan. The Strategy, through well-being objective 6 ‘Live well – create more jobs and growth throughout the County’, sets a framework for promoting economic growth, opportunities for the workforce and investing in the infrastructure that connects the County to encourage tourism.
- 6.19 Further to the Corporate Strategy, Carmarthenshire has a Strategic Regeneration Plan (2015-2030). The Plan provides more detail on the growth objectives and strategies for achieving them. Tourism and the leisure industry features highly within the regeneration strategy (pg 20), which employs 5,500 full time equivalent jobs throughout the County, noting that “A strong tourism industry and visitor economy will support a more prosperous economy overall and will help to sustain existing and create new jobs”.
- 6.20 The strategy sets out 5 key priorities to achieve economic growth in tourism as follows:
- 1 Raising the profile of Carmarthenshire
 - 2 Improving the tourism infrastructure
 - 3 Enhancing the tourism experience
 - 4 Enhancing the Sense of Place
 - 5 Invest in people
- 6.21 With the vision summarised as:
- “To develop a prosperous visitor economy in Carmarthenshire based on its unique strengths and character, which generates higher spend and local income, enhances its image and reputation and improves the quality of life for local communities”*
- 6.22 The strategy also identifies the Coastal Belt in Carmarthenshire (within which Laugharne sits), as being integral to the growth in tourism with the core objectives being:
- “General increases in visitors; square footage; quality offerings and visitor spend are the main objectives along the belt.”*

Summary of the Strategic Policy Context

- 6.23 Throughout national policy and guidance and local corporate strategy, tourism is considered a vital contributor to the economy. It allows Wales to optimise the benefits of its natural environmental resources in a sustainable way and Local Authorities should clearly plan to maximise opportunities to increase and diversify this part of the economy, creating jobs and investment in local communities.
- 6.24 This should be achieved by planning proactively for increased visitor accommodation and attractions, diversifying this offer (both in terms of type and price point) and by ensuring that the offer is year long where possible.

7.0 Carmarthenshire Deposit LDP

- 7.1 In accordance with The Act, The Deposit Draft LDP should respond to the objectives of national and strategic policy, plans and strategies. With respect to tourism, this requires the plan to be set out to achieve the objective set out in section 6 above. The following section highlights the policy within the Plan that seeks to do this and how it might meet these objectives.

Strategic Context

- 7.2 Throughout the draft LDP there is a clear emphasis on the importance of the visitor economy to Carmarthenshire, comments such as the need to have *'A buoyant visitor economy with potential to grow'* (p.25) evidences this.
- 7.3 Similar statements within the plan highlight the importance of the visitor economy to Carmarthenshire. Para 9.51 acknowledges the need to provide opportunities to cater for the County's visitor economy and refers to the need to distribute development in accordance with the settlement hierarchy.
- 7.4 Para 10.29 explicitly refers to the relationship between Western Carmarthenshire and Pembrokeshire signifying the opportunity for the strong tourism offer to develop in this area. The policy considers Laugharne a place which provides *"an important contribution to the overall sense of place and to the visitor economy."*
- 7.5 The above context is linked to one of the Councils Strategic Objectives (SO), which sets a clear aspiration for the Plan and seeks to deliver on an identified LDP issue. In the case of **SO13** the relevant LDP issues include:
- Issue 4. A buoyant visitor economy with the potential to grow.
 - Issue 25. Lack of employment opportunities, broadband and public services in rural areas.
 - Issue 26. Need to appreciate the sense of place – a county of contrasts.
 - Issue 32. Emerging national and regional considerations including Brexit, the National Development Framework and Strategic Development Plans. Planning Policy Wales (Edition 10) was published in December 2018.
- 7.6 To address these overarching issues, SO13 requires the need *for the plan* to *"Make provision for sustainable & high quality all year-round tourism related initiatives."*
- 7.7 How Carmarthenshire expects this Strategic Objective to be considered by applicants is detailed within Strategic Policy 10, which reads as follows:

Strategic Policy – SP 10: The Visitor Economy

Proposals for tourism and visitor economy related developments will be supported where they:

- a) exhibit high quality design and placemaking principles;*
- b) contribute to the protection and enhancement of the natural environment;*
- c) add value to our visitor economy;*
- d) are sustainably and appropriately located.*

Specific Policy approach

- 7.8 In order for Carmarthenshire to deliver on its Strategic Objective SO13 and thereby addressing identified issues, the Strategic Policy SP10 is supported by further detailed policy's VE1 – VE4. These Policies provide a supportive framework for the delivery of specific visitor accommodation and facilities guiding different types of development to different locations. The emphasis, particularly for permanent visitor accommodation is to be directed within or adjacent to existing settlements or visitor accommodation sites.
- 7.9 Further to these specific criteria based policies, growth in tourism related employment would also naturally be guided by the proposed employment policies EME1 – EME5, whilst in general, development of new tourism facilities would also need to consider Policy SD1 (Development Limits), which directs development to be within identified settlement boundaries.
- 7.10 The policies that therefore guide tourism based development in Carmarthenshire are proposed to be criteria based policy only, against which an applicant would need to demonstrate their proposals were appropriate in order to be granted planning permission.
- 7.11 The Council have chosen not to meet its strategic objective for increasing tourism through provision of any direct allocations. The plan identifies four different allocation types which are mixed use, economic, residential and strategic. No allocations are made solely for or led by visitor accommodation.
- 7.12 Several proposals were promoted for visitor accommodation during the call for sites. 16 sites passed the initial, high level assessment – however only one site (Burry Port Redevelopment Land) was allocated, where tourism forms part of a mixed-use scheme. The table in Appendix 3 identifies the sites and comments the authority made in their assessment. In general, proposed allocations for tourism accommodation were found not to meet LDP policy and therefore inappropriate for allocation. On a couple of occasions, the proposed allocations were found to meet emerging LDP policy, but similarly were not put forward for allocation.
- 7.13 Old Castle Works (PrC2/MU1) and the Life Science and Well-being Village (SP5) are two other strategic sites which are allocated within the Deposit Plan for a mix of uses which include a small element of tourism, although not necessary visitor accommodation.
- 7.14 We understand that the Councils preferred approach is to deal with proposals for tourism, and particular visitor accommodation on an ad hoc basis and to consider it against criteria based policy.

8.0 Response and Proposed Alterations

- 8.1 On behalf of the Laugharne Park Estate the following section sets out our response to the policy as proposed and our contention that it fails to adequately cater for available opportunities to

meet strategic objectives related to tourism and makes recommendations for alterations to the Draft Plan to allow it to do so.

- 8.2 As set out in section 4 above, there are two points of representation we wish to make and we will deal with each separately.

Allocate Land Adjacent to Laugharne Park Estate

Proposal

- 8.3 Seasons Holidays plc have purchased the land identified in Appendix 1. The purpose of the land purchase was two-fold. It was to create a temporary access track for the delivery of material associated with the development of planning application W/34546, and to allow the Laugharne Park Estate to plan for growth and expansion of its facilities. The creation of the temporary access track is subject to separate planning applications and is not considered further here.
- 8.4 The expansion plans are, however, relevant to these representations. Seasons Holidays plc has purchased the land with a view to the following:
- a Expansion of the visitor accommodation offer at Laugharne Park Estate;
 - b A new and sole access arrangement to the entire Estate – directing traffic away from the constrained town of Laugharne; and
 - c Introduction of ancillary leisure activities and facilities.
- 8.5 A plan, included in Appendix 4, demonstrates the indicative location of each of the three elements and how the allocation could be delivered. In Appendix 5 and indicative phasing strategy is outlined.
- 8.6 The visitor accommodation would be located to the southern end of the new land, closest to the existing Estate where there is already visitor accommodation. This would essentially mean for an extension of the existing park operations further south. In doing so, it will be located in the area where it is most sheltered from long range views of the existing landscape, significantly reducing any potential for visual impact. The visitor accommodation would be delivered in two phases, Phase 1 anticipated to be within 5-7 years, the second phase towards the latter part of the plan period.
- 8.7 The access road would roughly follow the route of the temporary access track, it would remove all Laugharne Park Estate traffic from the town of Laugharne, greatly reducing the impact of movements on the residents and the properties and ensure that larger vehicles (including delivery vehicles) will not have to use the constrained access through Laugharne, avoiding disruption for the residents and removing access constraints for servicing. Moving access away from the town centre is understood to be widely supported by residents and Ward Councillors. A new dedicated access will also provide a sense of arrival for the Estate befitting of the 5* plus standard of accommodation. The new access road would be delivered in phase 1.
- 8.8 The remaining landscape, as identified in the appended plan, is of varying topography making development less straightforward, and also has greater exposure from long range views. As such, this area of land is proposed to accommodate small scale ancillary leisure and recreation uses associated with those staying at Laugharne Park Estate. Development here would be minimal, limited to the use of the activities and designed to minimise visual impact. An example of the type of facilities are listed below and would come forward during phase 1 and phase 2:
- Woodland ranger learning activities for kids

- Bee hives and home-made honey
- Archery
- Woodland Poetry (recognising the sites link to Dylan Thomas)
- Horse riding
- Fishing

- 8.9 The three uses proposed within the allocation are inextricably linked, they are also reliant on their proximity to the existing Laugharne Park Estate. No other land could accommodate the proposals given ownership, proximity to existing use and the investment required. As such, this is the only suitable area of land for the proposed allocation.
- 8.10 Given the nature of the proposed uses, whilst the primary function is visitor accommodation, it would comfortably fit into the mixed use allocation category.
- 8.11 The allocation would be delivered in two phases. Phase 1 over the first 5-7 year period, phase 2 over the second half of the plan period. It could deliver up to 200 units of visitor accommodation (80-100 in phase 1 and 80-100 in phase 2). The benefits to the local economy are both tangible and measurable, and include up to 100 jobs.

Policy appraisal against soundness

- 8.12 The Strategic direction in Wales, as set out by national policy and guidance, is to promote tourism that contributes to the economy. Indeed, there is a requirement on LPA's and their development plans to create a framework to support tourism, which is seen as vital to the prosperity of the economy, and they should do all they can to capitalise on the distinctive tourism offer in Wales and its ability to create high quality year round employment. Even at a national level, West Wales is identified as have a key role to play in this.
- 8.13 The national framework is echoed at a local level as the Council's own corporate and regeneration strategies both acknowledge the very important role tourism plays, particularly in the coastal regions with a clear strategic direction to increase the quantum of visitor accommodation.
- 8.14 It is against the multifaceted strategic policy background that the LDP must accord if it is to be found sound.
- 8.15 The Deposit draft, whilst reflecting the above through a clear strategic objective SO13, then fails to provide a clear and consistent policy basis to ensure the objective, and by-proxy, the strategic national policy and local corporate strategy, can be achieved, measured and success monitored.
- 8.16 It is our view that the LDP should not simply rely on a criteria-based policies but also make allocations for significant tourism developments where appropriate. The Council proposes allocations for major employment and residential schemes as this provides certainty to local residents, land owners, developers and investors about where major development will be permitted. In our view a similar approach should be taken for major tourism proposals such as that proposed at Laugharne.
- 8.17 It is accepted that it would be impractical for the Council to allocate each and every potential tourism location and there is a need for a criteria-based policy, this does not mean however that no allocations should be made. Employment and residential policies operate successfully based on allocations for large developments with criteria-based policies for smaller schemes and

windfall sites. It is unclear why this approach cannot be extended to tourism given its fundamental importance to the County's economic strategy.

- 8.18 As currently drafted the Council cannot demonstrate that the Objectives and Policies of the Plan are effective and deliverable, they cannot demonstrate how they will meet the need for increased economic activity through tourism and if they cannot do this then they cannot be said to be according with the requirements of national policy.
- 8.19 Criteria based policy (through VE1-VE4) alone, is not sufficient to control such an important deliverable that can be quite clearly achieved through an allocation. What is more, a criteria based policy does not offer the land owner any sufficient degree of certainty to allow them to reasonably put forward or raise funds for the investments required. Without an allocation the Council is placing the onus on a developer to proceed at risk with something the Council needs in order to meet its strategic and corporate objectives. This is not effective, it questions whether the Council can deliver through this policy approach and certainly offers no means by which to monitor any delivery.

Allocation of the land North of Laugharne Park Estate

- 8.20 The proposed allocation of the land north of Laugharne Park Estate would provide the Council with a deliverable, viable and available site which can demonstrate a quantified release of additional visitor accommodation through the plan period. The accommodation would be of the highest quality, a luxury 5* + resort unlike anything else in the County, offer year round tourism and would create a significant number of jobs (a minimum of 100) locally and bring in revenue from tourism into the local area. The additional leisure and recreation facilities would also improve overall facilities within the wider coastal region. It meets the core national and local strategic and corporate objectives, it is precisely the type of visitor accommodation the area is striving to deliver.
- 8.21 In this sense, the allocation proposed is entirely consistent with LDP objectives and would assist the Plan in being found sound.

Extend the Development Limits of Laugharne

Proposal

- 8.22 The proposed amendment is to extend the Development Limits boundary of Laugharne to include the existing Laugharne Park Estate.

Policy appraisal against soundness

- 8.23 The proposed boundary of Laugharne is shown within the draft proposals map. The Development Limits boundary includes the existing built development of the settlement of Laugharne as well as the proposed new allocations for housing (3 x sites). The purpose of Policy (SD1), which guides Development Limits, is to prevent inappropriate development in the countryside; prevent coalescence of settlements and; to identify areas where development proposals would be permitted.
- 8.24 The existing Laugharne Park Estate, is not open countryside, does not border or close a strategic gap between settlements, and is an existing development site with extant and implemented permission for C1 use. It is the only area of brownfield land, benefiting from an implemented planning permission, that borders Laugharne, that is not within the development limits.

- 8.25 The planning permission is for C1 use, which is effectively a hotel use. The Laugharne Park Estate operates like a hotel, it has independent accommodation, to which you can be served meals, it has a reception, central hub including spa, and restaurant facilities and expansive open grounds. The fact the hotel accommodation is spread across the grounds rather than within one single building, does not make it a caravan park or static homes park. As a hotel use, it should logically be included within the development limits of that settlement in the same way that hotel uses adjoining settlements are elsewhere in the County.
- 8.26 The fact that the Laugharne Park Estate is not shown as being within the development limits makes the Plan inconsistent in how it treats main town centre uses. It limits further development that would assist economic growth at the Laugharne Park Estate, meaning it would not be effective, and as a result should not be found sound.

The Existing Estate

- 8.27 The Laugharne Park Estate, as noted above, represents an entirely different form of accommodation to the usual static home holiday accommodation. It is a hotel spread across a larger site, which offers year round accommodation. It therefore is an entirely suitable use to be included within a development limits boundary in a service centre such as Laugharne. The modification proposed would therefore be sound.
- 8.28 Furthermore, as with the allocation, the boundary amendment provides additional certainty for the owners should they choose to invest further in the Laugharne Park Estate to improve facilities and create jobs.

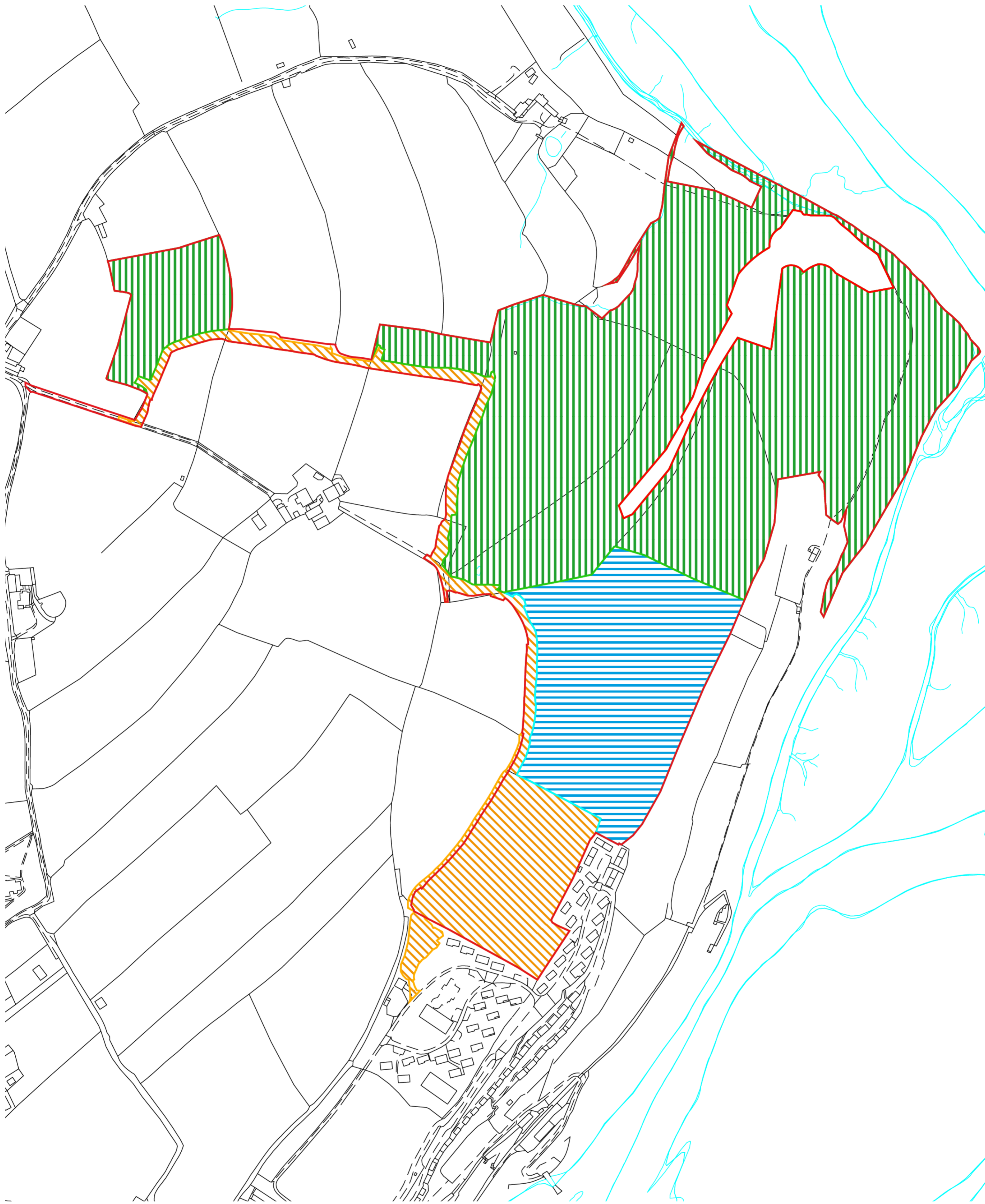
9.0 Conclusion

- 9.1 As identified above, there is a thread running through national and local strategic policy that recognises the importance of tourism to the Welsh economy and requires LDP and local authorities to plan for and support its growth in appropriate locations.
- 9.2 The Deposit Draft LDP for Carmarthenshire reflects this overarching strategy through its strategic objectives. However, both generally and specifically in Laugharne Park Estates case, the policy fails to support the implementation and delivery of the strategic objective.
- 9.3 There is no specific plan for growth, no indication of how the strategic objective will be met other than a reliance on operators coming forward against the backdrop of criteria based policy with limited or no certainty.
- 9.4 People and interpretation of policy change over time, as a result, this is not an effective means of delivering on such an important area of the economy and in an area that is a significant part of the regeneration strategy.
- 9.5 By failing to allocate visitor accommodation and ancillary leisure facilities and by failing to include the existing Laugharne Park Estate within the development limits boundary, the Plan fails to plan effectively for growth It fails to support viable and available development, has no means by which to monitor success of policy against the national and local objectives and finally fails to apply consistency in how main town centre uses are considered.
- 9.6 These representations propose two simple amendments to the LDP at deposit stage that will allow the LDP to robustly plan for growth of the visitor economy, give certainty that will allow for further managed development that will create a minimum of 100 local jobs and investment into the local area through planned growth throughout the plan period.

- 9.7 With the benefit of the proposed amendments, we believe the areas of the LDP plan we have commented on should be found sound.

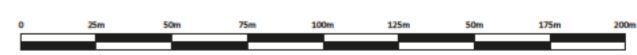


Appendix 3: Dylan Coastal Resort Phasing Plan

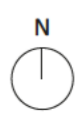


Key

- Phase 1 
- Phase 2 
- Phase 1 / 2 



Project	Laugharne Park
Title	Indicative Phasing Plan
Client	Seasons Holidays PLC
Date	20.03.20
Scale	1:2500 @ A2
Drawn by	SG
Drg. No.	IL61676/01-010 RevA



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Appendix 4: Dylan Coastal Resort Vision Document



Appendix 5: Economic Impact Assessment of Development at Dylan Coastal Resort

Briefing Note

Our ref 61721/02/GW
Date 22 March 2023

Subject Economic assessment of proposed expansion of Dylan Coastal Resort

1.0 Introduction

- 1.1 This note has been prepared by Lichfields on behalf of Seasons Holidays and assesses the economic impact of the proposed expansion of Dylan Coastal Resort.
- 1.2 The site currently has planning permission for 140 holiday lodges, of which 100 have already been completed, together with high quality leisure facilities such as a clubhouse spa, restaurant and swimming pool.
- 1.3 Dylan Coastal Resort is the only site in Carmarthenshire that offers this form and scale of high-end, year-round visitor accommodation. As such, it makes a significant contribution to the visitor economy of the local area. Seasons Holidays has submitted representations to Carmarthenshire County Council seeking the allocation of land adjacent to Dylan Coastal Resort for additional tourism accommodation.
- 1.4 It is proposed that the expansion will be brought forward in two phases, as follows:
- 1 Phase 1: c.100 holiday units to be delivered in the next three to five years; and,
 - 2 Phase 2: c.160 holiday units and additional recreational facilities to be delivered in the next five to ten years.
- 1.5 The analysis contained within this note considers the economic impact of the two phases separately.
- 1.6 In accordance with the approved Delivery Management Plan, it is anticipated that the new units would be delivered at a rate of between two and three per month. It is therefore expected that all 260 additional units could be completed within the emerging LDP period (i.e. by 2033).
- 1.7 The analysis contained within this note focuses on the key quantifiable economic impacts of the proposed development during the construction phase and after completion in the context of the role that a leisure development of this type has in supporting economic growth generally. It does not seek to quantify the existing economic impact of the site as a whole.
- 1.8 For development schemes of this type, the scale and type of economic impacts are determined by:

- 1 The scale of capital investment associated with the development, including any significant infrastructure requirements, which generates employment and economic output at the construction phase; and,
- 2 The quantum and type of accommodation units proposed, which lead to additional operational employment at the site, and generates additional expenditure from visitors and by Seasons Holidays itself.

1.9 The findings of this economic assessment should be positioned in the wider context relating to the role of tourism in facilitating the post Covid-19 economic recovery. The tourism and hospitality sector was disproportionately affected by repeated periods of lockdown and travel restrictions for both domestic and international holidaymakers. However, it is an area of the economy that is central to the recovery, particularly given the importance of tourism to the local economy in Carmarthenshire.

2.0 Construction Impacts

2.1 The construction costs and development periods of the two phases are summarised below:

Table 1 Estimated construction costs

Phase	Estimated construction cost	Build period
1	£28,000,000	3.3 years
2	£48,300,000	5.3 years
Total	£76,300,000.00	

Source: Seasons Holidays/Lichfields analysis of BCIS

2.2 Using labour coefficients from the Homes and Communities Agency (HCA) Calculating Cost per Job Best Practice Note (2015), we have calculated the number of direct construction jobs to be supported by the proposed development over the course of the construction phase. This approach assumes that for private commercial developments (including tourism proposals), 16.6 direct construction jobs will be created for every £1m investment (2011 prices). This figure has been applied to calculate the number of direct FTE construction jobs likely to be supported. Taking account of the construction period, the analysis indicates that the proposed development could be expected to support a total of 227 gross direct FTE jobs annually over the construction phase (comprising 109 direct FTE jobs annually for Phase 1 and 118 FTE jobs annually for Phase 2):

Table 2 Assessment of construction employment

	a	b	c	d	e
Phase	2023 construction value	2011 deflated construction value	Direct jobs per £1m investment p.a. (2011 prices)	Person-years of construction	No. direct FTE jobs p.a.
		a x deflation ratio (0.7809)		(b ÷ £1,000,000) x c	d ÷ build period (see Table 1)
1	£28,000,000	£21,866,581	16.6	363	109
2	£48,340,000	£37,751,090		627	118
Total	£76,340,000.00	£59,617,671.00		989	227

Source: HCA Calculating Cost per Job Best Practice Note (2015) / Lichfields analysis

- 2.3 During the construction phase, local suppliers and contractors will be used extensively. This will further support employment and the local economy. In so doing it will boost the construction sector in Carmarthenshire which employed 4,000 people in 2021.

Indirect and induced employment

- 2.4 In addition to direct employment opportunities, construction activity also involves purchases from a range of suppliers, some of which will be based in the local area. In turn, these suppliers purchase from other businesses further down the supply chain. Consequently, a number of indirect jobs would be supported in companies supplying construction materials and equipment.
- 2.5 Workers spending their wages in local shops, bars, restaurants and other facilities will help to support the creation of induced jobs. Therefore, businesses in the local area and beyond are also expected to benefit to some extent from temporary increases in expenditure linked to the direct and indirect employment effects of the construction stage.
- 2.6 Research by Centre for Economics and Business Research (CEBR) for the National Housing Federation (2019)¹ indicates that commercial construction work has an indirect and induced employment FTE multiplier of 1.11 in Wales².
- 2.7 As a result, it is anticipated that the proposed development could support an additional 252 spin-off FTE jobs annually over the construction phase, split between the two phases as follows:
- 1 Phase 1: 121 spin-off FTE jobs annually (in addition to the 109 direct FTE jobs identified in Table 2); and,
 - 2 Phase 2: 131 spin-off FTE jobs annually (in addition to the 118 direct FTE jobs)
- 2.8 This will be distributed across the UK economy, but it is expected that businesses within Carmarthenshire will benefit from trade linkages established during the construction phase of the development scheme.

Economic output

- 2.9 The construction phase of the proposed development will also make a contribution to local economic output, as measured by Gross Value Added (GVA), a commonly used measure of productivity and economic performance.
- 2.10 Based on 2022 Experian data, the construction sector generates an average GVA per FTE of £54,778 per annum within Wales³. Applying this to the employment impact of the scheme (as derived above), it is estimated that the proposed scheme could generate a total of £65.2 million of direct and indirect GVA during the overall construction period.

¹ <https://www.housing.org.uk/globalassets/files/resource-files/leic/local-economic-impact-calculator-2019---methodology.pdf>

² This multiplier relates to total employment and means that 1.11 indirect/induced jobs will be created across the UK for every new direct construction job.

³ Experian, March 2022

Table 3 Assessment of GVA generation during construction period

	a	b	c	d	e
Phase	No. direct FTE jobs p.a.	Direct GVA generated p.a.	Total direct GVA generated over construction period	Indirect GVA generated p.a.	Total indirect GVA generated over construction period
		a x GVA/FTE p.a. in construction sector (£54,778)	b x build period	b x multiplier of 1.2 ⁴	d x build period
1	109	£5,970,802	£19,882,771	£7,164,962	£23,859,325
2	118	£6,463,804	£34,452,075	£7,756,565	£41,342,490
Total	227	£12,434,606.00	£54,334,846.00	£14,921,527.00	£65,201,815.00

Source: Lichfields analysis of Experian Business Strategies

3.0 Additional expenditure

3.1 The UK Caravan and Camping Alliance Report, *Pitching the Value*⁵, quantified on- and off-site spending by guests staying at different types of accommodation. It identified a total of £540 million on-site expenditure and £366 million off-site expenditure from holiday parks/campsites in Wales.

3.2 The report shows that the level of spending varies by region and type of accommodation. Taking account of an adjustment for inflation⁶, a summary of the figures for holiday homes/lodges in South West Wales is set out in Table 4:

Table 4 Visitor expenditure relating to holiday lodges in South West Wales (per unit/per annum)

	Direct spending	Indirect spending	Total
Owned	£16,086.68	£7,610.90	£23,697.59
Rented	£18,822.25	£8,687.19	£27,509.44

Source: Lichfields analysis of *Pitching the Value* 2019 Economic Benefit Report: Holiday Parks and Campsites England

3.3 Visitor expenditure on rented units is higher than for units that are privately owned. This is because those visiting the area and renting their accommodation would typically be more likely to visit local cafés, bars and restaurants and go to local tourist attractions. Because owners are likely to visit the area much more frequently, they would be less likely to visit local attractions during each visit. They might also tend to cater for themselves in their lodges for at least part of their visits.

3.4 These figures do not include the cost of accommodation which may not be retained in the local area.

3.5 The proposed ownership structure of the new lodges is not known and so we have assumed that 90% of the new lodges will be available for rent via the Seasons Holiday booking platform and 10% will be retained for the sole use of their owners.

⁴ This multiplier means that £1.20 indirect/induced GVA will be created across the UK for every £1 in direct GVA.

⁵ <https://www.ukcca.org.uk/wp-content/uploads/2019/02/SC6407-00-Holiday-Park-Econ-Impact-Wales-Final-Report.pdf>

⁶ Based on Bank of England figure of 11.73% between 2019 and 2023

- 3.6 Based on the average expenditure figures for South West Wales set out in Table 4, the proposed development would be expected to generate:
- 1 A total of £4.8 million direct (on and off-site) expenditure per annum across the two phases (comprising £1.8 million on Phase 1 and £3 million for Phase 2); and,
 - 2 £2.2 million indirect expenditure per annum across the two phases (comprising £0.8 million on Phase 1 and £1.4 million for Phase 2); equating to,
 - 3 A total of £7.0 million spending per annum across the two phases (comprising £2.7 million on Phase 1 and £4.3 million for Phase 2).

Table 5 Additional expenditure arising from proposed new lodges at Dylan Coastal Resort

Phase	Type of unit	No. units	Total direct spending	Total indirect spending	Total spending
1	Owned	10	£160,867	£76,109	£236,976
	Rented	90	£1,694,003	£781,847	£2,475,850
	Total	100	£1,854,869	£857,956	£2,712,826
2	Owned	16	£257,387	£121,774	£379,161
	Rented	144	£2,710,404	£1,250,956	£3,961,360
	Total	160	£2,967,791	£1,372,730	£4,340,521
Total	Owned	26	£418,254	£197,883	£616,137
	Rented	234	£4,404,407	£2,032,803	£6,437,210
	Total	260	£4,822,660	£2,230,686	£7,053,347

Source: Lichfields analysis

Employment generation

- 3.7 *Pitching the Value* also identifies the level of employment associated with direct and indirect expenditure in different types of holiday park accommodation. Again, this information is provided at a regional level. An interrogation of this indicates that c.£55,000 spending supports 1 FTE job in South West Wales.
- 3.8 This evidence can be used to identify the number of jobs that could be supported by the additional spending at Dylan Coastal Resort, as follows:
- 1 A total of 86 jobs supported by direct (on and off-site) expenditure across the two phases (comprising 33 in Phase 1 and 53 in Phase 2); and,
 - 2 A total of 41 jobs supported by indirect expenditure across the two phases (comprising 16 in Phase 1 and 25 in Phase 2), equating to,
 - 3 A total of 86 jobs supported by the expenditure associated across the two phases (comprising 49 in Phase 1 and 78 in Phase 2).

Table 6 Employment generation associated with additional visitor expenditure at Dylan Coastal Resort

Phase	Direct jobs	Indirect jobs	Total jobs
1	33	16	49
2	53	25	78

Phase	Direct jobs	Indirect jobs	Total jobs
Total	86	41	217

Source: Lichfields analysis of Pitching the Value 2019 Economic Benefit Report: Holiday Parks and Campsites Wales

Economic output

- 3.9 Based on 2022 Experian data which states that the accommodation and food sector generates an average of £20,370 GVA per worker job within Wales, the direct expenditure associated with Phase 1 would support approximately £670,000 GVA per annum whilst the Phase 2 would support approximately £1.1 GVA per annum – resulting in a total of £1.7 million GVA per annum following the completion of both phases.
- 3.10 The HCA Additionality Guide identified a GVA multiplier of 0.56⁷ for recreation activities (including tourism). Applying this to the estimated GVA associated with the direct expenditure indicates that a further £375,000 of indirect GVA would be generated in Phase 1 and an additional £600,000 indirect GVA will be generated in Phase 2. In total, this equates to a total of approximately £2.7 million GVA per annum being supported by the expenditure associated with the additional development at Dylan Coastal Resort (comprising £1.0 million for Phase 1 and £1.7 million for Phase 2).

Table 6 GVA impact of additional visitor expenditure at Dylan Coastal Resort

Phase	Direct GVA	Indirect GVA	Total GVA
1	£671,110	£375,821	£1,046,931
2	£1,073,776	£601,314	£1,675,090
Total	£1,744,886.00	£977,135.00	£2,722,021.00

Source: Lichfields analysis of Pitching the Value 2019 Economic Benefit Report: Holiday Parks and Campsites Wales

4.0 Conclusion

- 4.1 Tourism is a crucial part of the economy in Carmarthenshire and Dylan Coastal Resort already makes a significant contribution through the provision of high quality, year-round accommodation.
- 4.2 The development of an additional 260 holiday lodges and associated recreational facilities in two phases will build on this existing contribution by:
- 1 Extending the range and choice of high-quality holiday accommodation in the local area and thereby increasing its attractiveness for visitors that might be likely to spend more than the average figures identified by *Pitching the Value*;
 - 2 Encouraging a greater number of visits in the off-peak and shoulder seasons. The nature of the accommodation offer at Dylan Coastal Resort is well suited to the meeting the needs of visitors that would like to have a break outside of the main summer period as the high-quality accommodation and existing/proposed range of indoor activities mean that it is not a weather dependent resort;

⁷ This multiplier relates to total GVA and means that £0.56 indirect/induced GVA will be created across the UK for every £1 in direct GVA.

- 3 Increasing the range of on-site facilities and attractions which will encourage greater levels of spending from those staying on the site, holidaymakers staying elsewhere and the local community.

4.3 As set out in this report, the proposed development will make a very important contribution to the local economy which will be realised through both phases. However, in the light of the points identified above, the figures that have been derived from an analysis of the *Pitching the Value* research are likely to underestimate the true economic impact of the proposed development to the local economy.

4.4 Tourism is central to the economy in Carmarthenshire. The delivery the proposed new phases of development at Dylan Coastal Resort will be important in building on it exiting success and in delivering further economic benefits. These should be afforded considerable weight in the consideration of the proposed allocation of land adjoining the existing resort.