

Our Ref.: 1081.a

Date: 5th April 2023

Forward Planning Manager,
Place and Sustainability,
Department of Sustainability and Infrastructure,
Carmarthenshire County Council
3 Spilman Street,
Carmarthen
SA31 1LE

Dear Sir/Madam,

Carmarthenshire Local Development Plan 2018-2033 – Deposit Draft
Representation on behalf of Johnson Brothers
Former Morlais Colliery, Pontardulais Road, Llangennech

Further to the publication of the above document, we have been asked by our Client to review its contents, policies and proposals and advise them of any aspects we believe would unreasonably affect their aspirations and interests. In doing so, we consider that the proposed provisions of **Policy SG2** are of particular interest to our Client. As a result, we offer the following for the Authority's consideration, and Inspector's in due course.

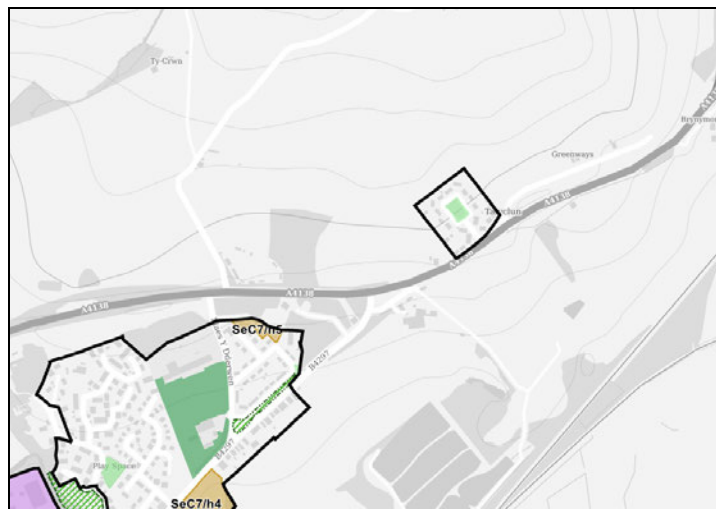
Our clients made a formal Strategic Candidate Site Submission in August 2018, which was referenced **SR/086/077**, seeking the allocation of their land for future mixed development within the defined settlement limits of Llangennech as part of the Replacement Local Development Plan, with the area and mix of uses put forward illustrated in the plan below.



Plan A

The Strategic Candidate Site comprised of a range of enclosures, both greenfield and brownfield in nature, with it having a number of access points off the A4318 running along its northern boundary and Pontardulais Road running along its north western boundary. The site is also within close proximity of Junction 48 of the M4 motorway. The site therefore represents an extremely sustainable location for a strategic form of development, as well as a location for a park and ride facility to assist with the Councils strategic sustainable transport objectives.

Following its due consideration, the Council then excluded the Site from the proposed development limits for Llangennech in its 1st Deposit LDP, published in January 2020 (Plan B).



Plan B

In explaining its decision to exclude the site and not allocate it for residential purposes, the Council advised in its 'Site Assessment Table' (January 2020) as follows:

“There is sufficient land available for development within the settlement to accommodate its growth requirements. However, the site may be considered at the revised LDP policy review subject to the performance of the Plan. The site will remain outside of the development limits.”

At the time of publication of the 1st Deposit LDP therefore, the principle of development at the location in question was considered acceptable by the Council, but unnecessary at the point of the Plan's adoption. However, as regular review of the Plan may identify shortfalls, the Council advised that the Site would be allocated under the provisions of Policy SG2 (Allocation SG2/1) as a reserve site, stating that:

“The site's potential strategic contribution incorporating employment and residential based proposals is within the context of Swansea Bay and Llanelli's position within the emerging National Development Framework.”

As part of the current consultation process into the 2nd Deposit LDP, the Council have again published a “Site Assessment Table” (2023), which provides details of the Council's analysis of each received Candidate Site submission. We note that our Client's land was considered as part of this process and as a result the Council concluded as follows:

“There is sufficient land available for development within the settlement to accommodate its growth requirements. However, the site may be considered at the revised LDP policy review subject to the performance of the Plan. The site will remain outside of the development limits.”

As can be seen, the rationale of the Council for the exclusion of the Site as an allocation in the LDP has remained the same and so in turn the Site continues to be allocated under the provisions of Policy SG2 as a 'reserve site'

The Policy sets out that such Reserve Sites will be released for development should other allocations (identified under Policies HOM1, EME1 and SG1) fail to contribute as expected to the delivery of the Plan's strategy. In our view, as detailed in separate submissions made in relation to such current allocations, we consider that a number of these sites will not be delivered and so we would fully support the allocation of our Clients land as a Reserve Site

under the provisions of Policy SG2, but would respectfully suggest in view of the evidence submitted that it perhaps should in fact be allocated under the provisions of Policy SG1.

We therefore welcome the decision of the Authority to concur with the representations previously made in relation to our Clients land. We can also confirm that the land continues to not face any ecological, flood risk related, highway, infrastructure or land ownership constraints that would restrict its ability to be delivered during the Plan period as a Reserve Site. In fact, our Clients have already been approached by a number of parties expressing a keen interest in developing the site should it be made available. We therefore fully support the decision of the Authority to include the land as a Reserve Site as part of the Deposit LDP.

Yours sincerely,

A solid black rectangular box used to redact the signature of Jason D Evans.

Jason D Evans

Director