

29 March 2023
Delivered by email

Forward Planning Manager
Planning Division
Environment Department
3 Spilman Street
Carmarthen
SA31 1LE

Dear Sir / Madam

CARMARTHENSHIRE SECOND DEPOSIT REVISED LOCAL DEVELOPMENT PLAN (2018-2033) CONSULTATION

I write on behalf of our client, Tata Steel Europe Limited (Tata Steel), in response to the current Carmarthenshire Second Deposit Revised Local Development Plan (RLDP) Consultation.

INTRODUCTION

Tata Steel owns and operates the Trostre Steel Works and owns Land at Maesarddafen Road/ Erw Las, Cefncaeau, which is allocated in the adopted Carmarthenshire Local Development Plan (2014) for residential development of 300 dwellings (site reference GA2/h35).

Part of this site (Land at Maesarddafen Road) was granted outline planning permission (reference: S/34991), for a residential development of up to 94 units on 7 March 2022. This permission remains extant. The Second Deposit RLDP includes this site as a proposed residential allocation (PrC2/H15).

An outline planning application for residential development is currently being considered by your Authority for the remaining land at Erw Las, which forms part of the current LDP allocation (GA2/h35). The application (reference: PL/05187) was registered on 29 December 2022 and the description of development is:

“The erection of new residential dwellings, vehicular access, open space and other associated infrastructure.”

Dialogue with the Council regarding this application is ongoing and we hope that it will be positively determined shortly.

The land in Tata Steel’s control at Erw Las, which forms part of the current LDP allocation (GA2/h35), is not retained as a residential allocation in the emerging RLDP.

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Accordingly, the representations set out below:

- Provide support for the proposed residential allocation at Maesarddafen Road (PrC2/H15).
- Object to the failure to allocate land at Erw Las, Cefncaeau for residential development. A Sustainability Appraisal relating to this site, along with a site location plan accompanies this submission.
- Provide commentary on Policy EME1: Employment- Safeguarding of Employment Sites and request clarification of the policy wording.

Our detailed representations in relation to the RLDP are set out below. A copy of the requisite response form is also attached.

SUPPORT FOR POLICY HOM1 ALLOCATION PRC2/H15 – LAND AT MAESYRDDAFEN ROAD

Our client strongly supports the proposed residential allocation PrC2/H15 (Land at Maeryrddafen Road, Llanelli). The proposed allocation provides for approximately 94 new homes on the site.

The proposed allocation reflects that the site benefits from an extant outline planning permission for a residential development of up to 94 dwellings. This permission is dated 7 March 2022. The Council's approval of this application clearly demonstrates the suitability and acceptability of the proposed development for residential development.

Carmarthenshire County Council's Committee Report for the application (S/34991, dated 19 March 2019) confirms that the principle of development of the site is acceptable and the proposal complies with key planning policies and sustainability objectives.

The Committee report confirms that:

'The site is well integrated with the existing pattern of development in Llwynhendy and is capable of accommodating a development of the scale and density proposed without compromising the quality of the scheme or detracting from the character and appearance of the surrounding area. The development will provide a wide range and choice of housing types and sizes which will be well related to the existing services and facilities in the wider Llanelli area as well as being within easy access of a variety of sustainable modes of transport. It will also contribute to the improvement of educational, open space and pedestrian and cycling facilities in the surrounding area. The level of contributions secured are considered to be commensurate with the scale and nature of the development.'

In addition, the development satisfies the sustainability requirements of the LDP from an environmental quality and utility provision perspective by implementing a drainage strategy that will dispose of foul and surface water in a sustainable and controlled manner as well as providing betterment to the capacity of the public sewerage system. Furthermore, and as outlined in the appraisal above, there are no highway, amenity, or ecological objections to the development.' (Page 13)

The conclusions drawn in granting outline planning permission remain unchanged when considered against national planning policy/guidance and the emerging RLDP. The site remains well integrated to the existing pattern of development, accessible to a range of sustainable modes of transport and capable of accommodating the scale and density of new homes proposed.

The site has been marketed by Harris Lamb Property Consultancy and offers have been received. We understand that discussions are progressing and Tata Steel has entered into an exclusivity period with a preferred developer. This demonstrates that the site is viable and deliverable in the short term.

POLICY HOM1: HOUSING ALLOCATIONS

Whilst supportive of the proposed allocation at Maeryrddafen Road, Llanelli (PrC2/H15) through Policy HOM1 (as set out above), our client strongly objects to the failure to allocate land at Erw Las, Cefncaeau for residential development.

The proposed site (see attached plan) forms part of a wider allocation within the adopted LDP (alongside land at Maesyrdafen Road) for a development of 300 residential homes (GA2/h35). As outlined above, the Council has already granted outline planning permission for up to 94 units on part of this allocated site (application reference: S/34991 – land at Maesyrdafen Road). Whilst land at Maesyrdafen Road is proposed as an allocation in the RLDP, the remaining land within Tata Steel's control at Erw Las is not carried forward as a proposed allocation.

Our client strongly supports the continued allocation of land at Erw Las for residential development. This would provide for additional new homes to come forward on a sustainable site, which is currently allocated in the adopted LDP.

The site is subject to an outline planning application for residential development (application ref: PL/05187) which was registered on 29 December 2022 and is currently being considered by Carmarthenshire County Council. We hope that the application will be determined positively shortly.

The plans and suite of supporting technical documents submitted alongside the application demonstrate that there are no significant constraints that would prevent the development of the site for the proposed use and confirm that the development complies with relevant planning policy.

Interest from the market has been received in relation to the site at Erw Las. This demonstrates that the site is both viable and deliverable in the short term.

In summary, Tata Steel wish to see its land at Erw Las retained as an allocation for residential development of circa 100 dwellings. The land holding (and existing allocation) also includes residual land which provides the opportunity to bring forward a considerable area of new public open space and green infrastructure.

Sustainability Appraisal

Accompanying this submission is a Integrated Sustainability Appraisal for the proposed site at Erw Las, Cefncaeau. The Sustainability Appraisal follows the template provided within the Council's 'Integrated Sustainability Appraisal (ISA) Guide for Promoters of Sites for Development' (February 2023).

The appraisal confirms that the site represents a sustainable development option. The Integrated Sustainability Appraisal does not raise any significant constraints beyond those that could be mitigated through the detailed design of the development.

The technical documents prepared to support the outline planning application (application reference: S/34991) further establish the suitability of the site to provide residential development.

The site is also well served by good quality pedestrian routes and public footpaths providing links to the centre of Llanelli. A play area and area of open space is located directly to the north of the site to the rear of Tir Eion. The site is within walking distance of existing bus stops on Heol Hen, Maes Ar Ddafen Road and Llwynhendy Road, providing access to a range of destinations within Llanelli and further afield, including Llanelli Town Centre and the Trostre and Pemberton Retail Parks.

In addition to the Trostre and Pemberton Retail Parks, a range of services and facilities are located along Llwynhendy Road. A range of key services and facilities are therefore located within a 300-1500m walk of the site, ensuring the site has good accessibility.

Furthermore, there are clear similarities between the assessment of the allocated site at Maesyrdafen Road and the proposed site at Erw Las. Both sites were considered jointly in the adopted LDP and form a single allocation, acknowledging the close physical and functional relationship between the two sites, which includes a footpath running between the sites. It is considered that the land at Erw Las land performs as well as the proposed allocation at Maesyrdafen Road.

The land controlled by Tata Steel at Erw Las would provide a viable and deliverable allocation that could be brought forward quickly. As demonstrated above, a significant amount of technical work has been completed to support the outline planning application, confirming that the site is not impeded by significant technical constraints. The site could therefore be brought forward swiftly, contributing to the continuous supply of deliverable sites and thereby helping to address the identified need for new housing.

The development of the site will also help to sustain and enhance the existing services and facilities available within Llanelli, resulting in a wide range of spin-off benefits for the local community.

POLICY EME1: EMPLOYMENT- SAFEGUARDING OF EMPLOYMENT SITES

The Tata Steel owned Trostre Steelworks is designated within the RLDP as an existing employment area through Strategic Policy 7 (SP7): Employment and the Economy. Policy SP7 recognises the contribution of existing employment sites as part of the employment portfolio in meeting ongoing need.

Policy EME1 safeguards sites identified for employment purposes for such uses (specifically Class B1, B2 and B8 uses). Our client welcomes the designation of the Trostre Steelworks as an existing employment site. Tata also welcome the support for employment related proposals within this area as provided by both Policy EME1 and EME2, which allows for the extension and / or intensification of existing employment enterprises.

Policy EME1 sets out criteria where, exceptionally, proposals which result in the loss of employment sites is acceptable. The wording to that policy does not make it clear whether all or some of the criteria need to be met. This should be clarified. It is considered that only some of the criteria would need to be met as not all the criteria would be relevant to every proposal.

Support is, however, given to criterion (f) of Policy EME1 which allows uses which are complementary to the primary employment use of the surrounding area. This recognises that non B-class uses and ancillary uses can be appropriate for locations within an employment site. Examples (not exhaustive) of such uses could include those relating to education or visitor centres.

Summary

I trust that the above representations assist and changes are made to reflect the position of Tata Steel in the preparation of the Plan as it progresses.

I would be grateful if Turley/Tata can be kept informed of future stages of the emerging Revised Carmarthenshire Local Development Plan.

If you require any further information please do not hesitate to contact me.

Yours sincerely



Abi Roberts
Associate Director

