

Carmarthenshire Revised Local Development Plan - Further Written Statement

Tata Steel Europe Limited (Representator ID: 5155) (now Tata Steel UK Limited)

Matter 4: Prosperous People and Places – Employment, the Visitor Economy and Infrastructure

Introduction

1. This Further Written Statement has been prepared on behalf of Tata Steel UK Limited (Tata Steel). It should be read in conjunction with previous representations submitted by Tata Steel to earlier stages of the Revised Local Development Plan (LDP) process.
2. This Statement relates specifically to Matter 4, Question 8 as set out in the ‘Schedule of Matters, Issues and Questions’ (August 2024). Having reviewed the questions set out by the Inspectors, Tata Steel has no further written comments in relation to the other questions under Matter 4.

Response to Question 8

3. Question 8 relates to Policy EME1 and whether it provides an appropriate framework for the safeguarding of employment sites.
4. Tata Steel operates the Trostre Steelworks, which is an important existing employment site. Tata Steel supports the principle of a policy within the Replacement LDP which recognises the contribution of existing employment sites and acts to safeguard such sites. The wording of Policy EME1 should, however, be amended to ensure it is clear and provides a sufficiently flexible framework for the safeguarding of such sites.
5. Policy EME1 sets out criteria where, exceptionally, proposals which result in the loss of employment sites is acceptable. The policy wording is not sufficiently clear as to whether some or all the criteria need to be met. This should be clarified. We are firmly of the view that to provide an appropriate framework, it should be made clear that not all criteria need to be met as in many cases, they will not be relevant to every proposal.
6. The policy is also worded in such a way that it reads as applying to cases where existing employment sites will be lost in their entirety. Whilst this will be applicable in some instances, it does not account for cases where the primary Class B1/B2/B8 use may be retained, but part of the site brought forward for other complimentary (non-Class B) uses. This is likely to be particularly relevant to larger employment sites. It is important that the Replacement LDP provides a positive policy framework to ensure existing employment sites can evolve and react to future innovations, market changes etc.
7. As worded, Criterion (f) of Policy EME1 applies to cases where sites will be lost in their entirety, with the acceptability of complimentary uses being assessed against the surrounding principal employment uses. Policy EME1 should allow sufficient flexibility for complimentary (non-Class B)

uses to come forward on all/part of existing employment sites. Such uses may include examples such as education, visitor centres or uses classed as Sui Generis. In such cases, the proposed use(s) should be considered on a case-by-case basis and in the context of their surrounding land uses. The latter may not always be adjoining employment uses, but could include a wide range of uses.