ARUP

Carmarthenshire County Council

Machynys Hotel Outline Planning Application

Information to Inform a Habitats Regulation Assessment (HRA)

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1. Introduction

Ove Arup and Partners Limited (Arup) has been appointed by Carmarthenshire County Council (CCC) to submit information to inform a Habitats Regulations Assessment (HRA) in support of an outline planning application for the proposed development of a hotel and associated landscaping, drainage and other supporting infrastructure, with all matters reserved, on the land east of Pentre Nicklaus Avenue at Machynys, Llanelli, (hereafter referred to as the "site").

This is intended to provide information to the Competent Authority, CCC, to assist them with assessing the implications on International Sites as a result of the proposed works.

This Habitat Regulations Assessment (HRA) is supported by an Ecological Impact Assessment (EcIA)[1], that has been submitted with the planning application.

1.1 Purpose of this document

This document has been prepared by Arup on behalf of CCC in relation to the potential for effects on International Sites as required by Regulation 63(1) of the Habitats Regulations. The document covers Stage 1 Screening and Stage 2 Appropriate Assessment of the HRA process in respect of construction and operation of the scheme and is to be submitted to the Local Planning Authority to formally request their views on the assessment under Regulation 76 of the Habitats Regulations. Specifically, whether the works can proceed within the parameters described within this assessment and an agreement reached with the conclusions stated.

1.2 Legislative context

Responsibility for determining whether a project or plan will have a likely significant effect on an International designated site lies with the 'competent authority', which in this case is CCC. This Habitats Regulations screening report and appropriate assessment has been prepared to assist the competent authority in determining the potential for likely significant effects of the project on Internationally designated sites 'International Sites', in compliance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended[2]); hereafter referred to as the 'Habitats Regulations'.

Regulation 63 of the Habitats Regulations requires a competent authority, to make an 'Appropriate Assessment' of the implications of the plan or project for that site in view of its conservation objectives, before deciding to undertake or give consent for a plan or project which (a) is likely to have a significant effect on an European Site (either alone or in combination with other plans or project), and (b) is not directly connected with or necessary to the management of that site. In light of the conclusions of the assessment, the competent authority may proceed with or consent to the plan or project only after having ascertained that it will not adversely affect the integrity of the European Site (henceforth referred to as International Site)[3].

All plans and projects should identify any possible effects early in the plan/project making process and then either alter the plan/project to avoid them or introduce mitigation measures to the point where no adverse effects remain. The 'competent authority' shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned, and if appropriate, having obtained the opinion of the general public.

For the purpose of this assessment, International Sites are taken to include any sites within the National Site Network, including those previously designated under the Habitats Directive (92/43/EEC), as well as Ramsar sites. For completeness these have included Special Areas of Conservation (SAC), Special Protection Areas (SPA), European Marine Sites (EMS) and Wetlands of International Importance designated under the

[1] Arup (2024). Machynys Hotel Development. Ecological Impact Assessment (EcIA).

[2] Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

[3] International Sites, European Offshore Marine Sites and, as a matter of Assembly Government policy, pSPAs, pSACs and Ramsar sites, are included in the expression "internationally designated sites" throughout the report. Where a particular section applies in relation to some internationally designated sites but not to others, this is stated in the relevant section.

Ramsar Convention (known as Ramsar sites). The UK Government wishes that candidate and possible sites (e.g. cSACs and pSACs) included in a list sent to the European Commission are also considered as if they have already been classified or designated. A summary of these designations is detailed below:

- SACs are high-quality conservation sites that have been given strict protection under the Habitats Regulations. These important sites are selected to conserve a range of rare and vulnerable animals, plants and habitats (excluding birds).
- SPAs are strictly protected sites that have been implemented to protect rare and vulnerable bird species and their habitats.
- EMSs are marine areas protected as SACs or SPAs often managed through underlying Site of Special Scientific Interest (SSSI) or Areas of Special Scientific Interest (ASSI). These areas range from subtidal to intertidal and can comprise the entire SAC or SPA or only part of it.
- Ramsar sites are wetlands of international importance that have been designated under the Ramsar Convention (1971). Sites are selected for their international significance relating to all ecology, botany, zoology, limnology or hydrology wetland components. The designation recognises the importance of wetlands as economic, social and environmental entities and the need to conserve them.

Sites contained within the National Site Network are designated for both Annex I habitat features and Annex II species. The statutory nature conservation organisations (in this case Natural Resources Wales (NRW)) have a duty to publish conservation advice for European marine sites (under Regulation 37 of the Habitats Regulations). This information contains the conservation objectives and targets relating to maintaining the integrity of these features.

1.3 Structure of this report

The report uses the following structure:

- Section 2 provides information on the proposed works (the ‘project’);
- Section 3 provides the HRA methodology and guidance;
- Section 4 provides environmental baseline of the site and the information on the International Sites that are considered within the assessment;
- Section 5 provides a screening assessment for the potential pathways for effect;
- Section 6 provides an appropriate assessment of any likely significant effects, including in-combination effects; and
- Section 7 provides conclusions.

2. Project description

2.1 Site location and context

The proposed development site is located approximately 2.4 km (grid reference: SS50849834) to the south-east of Llanelli town centre on the Machynys peninsula that is situated on the banks of the River Loughor and Burry inlet. It is low lying land comprising largely grassland, scrub, trees and woodland. The application site is bounded to the north by the B4304 Coastal Link Road, to the east by greenfield land and the Nicklaus Avenue access road to the Machynys Peninsular Golf & Country Club further east, to the south by residential properties within Pentre Nicklaus Village, and to the west by Pentre Nicklaus Avenue. The northern boundary has a number of landscaped bunds, which form a visual screen between the site and the B4304 road. Both the application boundary for the hotel development and the wider ecological survey area can be viewed in Figure 1.

The development area covers part of the site occupied by the former Machynys brickworks in the early part of the 20th Century and there is still evidence of hard standing and stoney areas at the site. This site is therefore classed as a brownfield site. Parts of the brickworks were redeveloped as the Machynys Peninsula Golf course as part of the Llanelli Waterside regeneration plan.

2.2 Planning history

On the 10th April 2013, full planning permission ref. S/22567 was granted subject to conditions, for the construction of a new 125-bedroom hotel with associated car parking, access roads, landscaping and infrastructure works. The application included the importation of inert material for infilling of land to raise level for the development at the application site. This has application has since expired.

An outline planning application was subsequently prepared by Arup in 2021 for a refresh of an existing hotel permission (ref. S/22567) at Machynys, however following pre-application consultation with Natural Resources Wales (NRW), it was determined that the development of the eastern part of the Machynys area for a hotel was unfeasible due to flood risk. The application has not been submitted to the Local Planning Authority (LPA). T

To address the concerns of NRW, it is proposed to relocate the hotel site to respond to the latest site constraints including the areas at risk of flooding. Arup has prepared outline parameter plans which set out the maximum heights and footprint of a potential hotel building. The site-specific plans have now been updated to reflect the change in site and the assessments would need to reflect the new constraints. Though ecology surveys (an Ecological Impact Assessment for the east of the site (2021), and an Ecological Appraisal for the west of the site area in 2020) were undertaken previously, these have now lapsed having occurred more than two years ago in accordance with CIEEM's report validity guidance[4]. Survey data has since been refreshed by surveys through 2023 and 2024 to accompany this HRA.

2.3 Proposed development

The proposed development is described as follows:

"Outline planning application for the development of a hotel and associated infrastructure, with all matters reserved."

The proposal incorporates associated infrastructure and landscaping, including the construction of a car park benefitting from 140no. parking spaces, and the creation of a green space around the hotel's perimeter, designed to provide a net benefit in biodiversity and mitigate potential flood risk. The surface water drainage is proposed to connect into the southern ditch of outline boundary, this is hydrologically connected to the various drainage ditches and ponds present within Machynys golf course.

Access to the hotel would be provided from the B4304. A new separate dedicated service vehicle access road to the west of the site would ensure that the hotel can be serviced discretely, keeping staff and service

[4] CIEEM (2019) On The Lifespan of Ecological Reports & Surveys

vehicles separate from guest vehicles if required. The service access and building levels would be set above minimum levels recommended in the Flood Consequences Assessment to reduce the risk of flooding and to ensure safe access for emergency vehicles at all times.

The areas of the proposed development are as follows.

- Hotel Footprint = 1480m^2
- Hardstanding footprint = 6264m^2
- SuDs (marked and proposed) = 843m^2 + 578m^2
- Roof Area = 532m^2 (50% coverage)

An illustrative site Parameter Plan is provided in Appendix B which will form the basis for a Landscape Masterplan. The noise report shows baseline noise levels of 48 DB LA90 and 63 LAeq. Noise levels during site preparation and construction may typically be up to 74 to 75 dB LAeq, including landscaping. Task lighting could be required during construction as well as security lighting.

The temporal scope is as follows: pending reserved matters approvals / consents and procurement, the construction period will last 18 months potentially from 2026 with the operational phase commencing in 2029.

The application site exceeds one hectare and therefore constitutes ‘major development’ as defined within The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (as amended).

An emerging planning application is proposed to the south of the hotel development comprising nine residential units which will form a separate planning application with a separate Habitat Regulations Assessment.

3. HRA Guidance and Methodology

This section sets out the guidance and evidence base used in assessing the potential effects of the project.

3.1 Guidance and policy

This information has been informed by the following guidance and policy documents:

- Planning Policy Wales - Technical Advice Note (TAN) 5: Nature Conservation and Planning[5]; The
- Habitats Regulations Assessment Handbook, DTA Publications Ltd[6]; and
- Tyldesley, D. and Chapman, C. 2018. People Over Wind[7] – some Implications of the Judgment. The Habitat Regulations Journal, Issue 10, pp. 19 – 23.

This guidance is intended to improve understanding of how projects are regulated under the Conservation of Habitats and Species Regulation. This guidance draws on experience throughout Britain and on case law in Britain and Europe.

3.2 Desk study information

In addition to the guidance noted above, a number of websites were used to gather information on the International Sites in order to inform this assessment, in particular, the Management Plans for International Sites and Regulation 37 information. Websites used include:

- Natural Resources Wales (NRW) (and legacy body Countryside Council for Wales (CCW)[8]) website[9];
- MAGIC (Multi-Agency Geographic Information for the Countryside) website[10]; and
- JNCC website[11].

Information on the interest features of International Sites has been obtained from the information provided on the JNCC website and NRW website. In particular, the Core Management Plans for International Sites were obtained and have been used to inform this assessment. These documents provide the main elements of NRW's management plan for International Sites along with the Conservation Objectives for the features.

The features will be considered to be in Favourable Conservation Status only when the conservation objectives are being met. These objectives therefore provide an indication of the type of effects which could affect the features of International Site. An effect which could affect the ability of a Site or feature to meet its objective could be considered to be an adverse effect on the integrity of the International Sites concerned.

[5] Welsh Government. (2009). Planning Policy Wales - Technical Advice Note 5: Nature Conservation and Planning. Cardiff: Welsh Government.

[6] Tyldesley, D. and Chapman, C. (2013) The Habitats Regulations Assessment Handbook. Nov 2019 edition. UK, DTA Publications Ltd https://www.dtapublications.co.uk/

[7] People over Wind, Case C323/17 European Court of Justice, 12th April 2018.

[8] CCW has been amalgamated with the Environment Agency Wales and the Forestry Commission in Wales to form Natural Resources Wales

[9] Natural Resources Wales Find Protected Areas of Land and Seas https://naturalresources.wales/guidance-and-advice/environmental-topics/wildlifeand-biodiversity/find-protected-areas-of-land-and-seas/designated-s

[10] MAGIC. (2014). Magic interactive Mapping Application. http:/www.magic.gov.uk/MagicMap.aspx

[11] JNCC Website https://jncc.gov.uk/

3.3 Habitats regulation assessment methodology

To understand the potential implications for International Sites from the project it is necessary to identify those sites that are located close to the project or are linked by pathways such as hydrological connections. All International Sites, including European Marine Sites, within 10km of the project were identified using Geographic Information System data from datasets downloaded from the JNCC, MAGIC and NRW.

3.3.1 Understanding Qualifying Interests and Conservation Objectives

For each of the sites identified, the qualifying features were established and the conservation objectives for each feature were obtained. Information was also sought to understand the potential vulnerability of the features to any effects that might arise from the project.

3.3.2 Identification of the Potential Effects of the Project

Any potential effects and pathways for effect on International Sites resulting from the project were identified prior to consideration of best practice procedures (for example, Guidelines for Pollution Prevention and Construction Industry Research and Information Association (CIRIA) guidance[12]) or the integration of any mitigation measures.

3.3.3 Identification of Plans or Projects Considered for In-Combination Effects

An 'in-combination' assessment is required where the project may have an effect on an International Site, but on its own the effects would not be significant. The potential effects of the project should be considered in-combination with other plans or projects that similarly may have an effect, where the combined effects may become significant.

3.3.4 Consideration of the Significance of Potential Effects

The significance of potential effects was assessed in the absence of any avoidance and/or mitigation measures. The assessment has been made with awareness of the conservation objectives for the features of the International Sites, although as stated in the relevant guidance the assessment of the project against the conservation objectives is not required until the Appropriate Assessment stage of the HRA process. In the assessment of the significance of effects, professional judgement was applied using the following criteria (as sufficient information about the elements and interests is often unavailable):

- The vulnerability/sensitivity of the receiving environment/features of interest;
- When the risk of effects is likely to occur (e.g. construction and/or operation);
- The likely geographical extent of the effects; and
- Likelihood of significant effects (e.g. those above negligible in magnitude) occurring based on previous experience with similar elements, where available.

Where there was not enough information about the risk of qualifying interest being present, or of the risk of effects, the assessment used the precautionary principle to inform the judgement. The precautionary principle has been applied to ensure that any assessment errs on the side of caution, without being overly cautious. This principle means that the conservation objectives should prevail where there is uncertainty or that harmful effects will be assumed in the absence of evidence to the contrary.

3.4 The HRA process

The assessment of a project under the Habitats Regulations can be split into several sections as shown in Appendix A[7], however, there are effectively four stages to the assessment as described below.

- Stage 1 - HRA screening is the assessment of the likelihood of a plan or project having a significant effect on an International Site or its features without mitigation alone or in-combination. This is the trigger for the need for an Appropriate Assessment as set out in Regulation 63(1).

[12] CIRIA. Available from: https://www.ciria.org/ [Last accessed October 2024]

- Stage 2 - The Appropriate Assessment is the detailed consideration of the potential effects of the plan or project in relation to the conservation objectives for the International Site(s) to determine if there is likely to be an adverse effect on the integrity of the site (AEOI) (i.e. an effect that would compromise the site meeting its conservation objectives). Providing it can be demonstrated that with appropriate mitigation measures the plan or project would not give rise to an adverse effect on the integrity of an International Site, the plan or project can proceed.
- Stage 3 – Alternative Solutions. If AEOI cannot be ruled out, the HRA must explore if less damaging alternative solutions could deliver the overall objectives of the project.
- Stage 4 - Imperative Reasons of Overriding Public Interest and Compensation (IROPI). If no alternative solutions exist, the project can only proceed if IROPI apply and compensatory measures must be delivered before consent is granted.

3.4.1 Consideration of Mitigation

With regards to case law (Coillte vs People Over Wind[7]) the inclusion of plainly established and uncontroversial mitigation during Stage 1 is no longer considered appropriate. Mitigation, as considered by the Centre Européen de Coopération Juridique (CECJ) in regard to the case law[7], is interpreted to mean measures that are intended to avoid or reduce the harmful effects of the envisaged project on the site concerned.

Consequently, any project which identifies an impact on an International Site and where avoidance and mitigation is applicable will need to address these measures during Stage 2 Appropriate Assessment.

3.5 Limitations

Information provided by third parties, including publicly available information and databases, is considered correct at the time of publication. Due to the dynamic nature of the environment, conditions may change in the period between the preparation of this report, and the construction and operation of the project.

The HRA has been undertaken in as detailed a way as possible, using all available data sources where they exist. However, the conclusions drawn from this is necessarily limited by the age, type, coverage and availability of data. Any uncertainties and the limitations of the assessment process are acknowledged and highlighted.

Recommendations for mitigation measures to address the potential adverse effects on the International Sites' integrity identified by this report are also based on the information available at the time of the assessment.

4. Environmental baseline

An updated Extended Phase 1 Habitat Survey was undertaken on survey area on the 10th October 2023, with results shown in Figure 3. Detailed results from the Extended Phase 1 Habitat survey and habitat locations are reported in the Preliminary Ecological Appraisal[13] and EcIA[1]. The survey was carried out in accordance with standard Joint Nature Conservation Committee (JNCC) Extended Phase 1 Habitat survey methodology[14].

4.1 Designated sites

The desk study highlighted eight internationally designated statutory sites within 10km of the site. Distances and directions are measured from central point of the proposed development, and locations can be viewed in Figure 2. A summary of the site designations can be viewed below:

- 1 Ramsar site: Burry Inlet (located 367m southwest)
- 2 Special Protection Areas (SPA): Burry Inlet (located 367m southwest) and Carmarthen Bay (located 8.8km southwest)
- 5 Special Areas of Conservation (SAC): Carmarthen Bay and Estuaries (located 357m southwest), Gower Commons (located 5.1km south), Carmarthen Bay Dunes (located 5.7km southwest), Bristol Channel Approaches (located 6.4km west) and Bristol Channel Approaches (located 8.8km south).

Carmarthen Bay & Estuaries SAC, Camarthen Bay SPA, Burry Inlet SPA and Ramsar Sites form the Camarthen Bay and Estuaries European Marine Site (hereafter referred to as 'Camarthen Bay and Estuaries EMS'). Carmarthen Bay and Estuaries SAC shares the same boundary as the EMS, whilst the Burry Inlet and Carmarthen Bay SPAs are wholly encompassed within the EMS boundary. Locations of the sites can be viewed in Figure 2.

Burry Inlet Ramsar[15]

The Burry Inlet is a large estuarine complex; it includes extensive areas of intertidal sand- and mudflats, together with large sand dune systems at the mouth of the estuary. The site contains the largest continuous area of saltmarsh in Wales (2,200 ha). The plethora of habitats provides for important feeding grounds and resting areas. The site is designated for peak counts of 41,655 waterfowl in winter and Ramsar Criterion peak count of redshanks (*Tringa totanus*) in spring/autumn, and a peak count of northern pintail (*Anas acuta*), Eurasian oystercatcher, and red knot (*Calidris canutus*) in winter.

Burry Inlet SPA[16]

The site qualifies for its regular use by 1 % or more of the biogeographic population of regularly occurring migratory species: red knot (*Calidris canutus*), oystercatcher (*Haematopus ostralegus*), pintail (*Anas acuta*), and redshank (*Tringa tetanus*). The area also qualifies by regularly supporting at least 20,000 waterfowl, including: curlew (*Numenius arquata*), dunlin (*Calidris alpina alpina*), grey plover (*Pluviatilis squatarola*), shelduck (*Tadorna tadorna*), shoveler (*Spatula clypeata*), teal (*Anas crecca*), turnstone (*Arenaria interpres*), and wigeon (*Anas penelope*).

[13] Arup (2023) Mixed Use Development at Machynys. Preliminary Ecological Appraisal

[14] Joint Nature Conservation Committee (2010) Handbook for Phase 1 habitat survey – a technique for environmental audit

[15] Burry Inlet Ramsar. Full citation available from: [Last accessed October 2024]

[16] Burry Inlet SPA. Full citation available from: [Last accessed October 2024]

Carmarthen Bay SPA[17]

Carmarthen Bay SPA was the first fully marine SPA in the UK, designated in June 2023. It is a single feature site for the common scoter (*Melanitta nigra*). More than 50% of the non-breeding population is found at fewer than ten sites and Carmarthen Bay is considered the most important, consistently recording peak numbers of 17,000-22,000 birds.

Carmarthen Bay and Estuaries SAC[18]

The key habitat features for which the Carmarthen Bay and Estuaries is designated as a SAC include sandbanks, estuaries, mudflats and sandflats not covered by seawater at low tide, large shallow inlet and bays, salicornia and other annuals colonizing mud and sand and Atlantic salt meadows. The Burry Inlet and Three Rivers system provides a migratory route for salmonids, river lampreys (*Lampetra fluviatilis*), sea lamprey (*Petromyzon marinus*), shad (*Alosa alosa*, and *Alosa fallax*), and otter (*Lutra lutra*).

Carmarthen Bay Dunes SAC[19]

The key habitat features for which the Carmarthen Bay Dunes is designated as a SAC include embryonic shifting dune, including shifting dunes along the shoreline with *Ammophila arenaria*, fixed coastal dunes with herbaceous vegetation, dunes with Salix repens and humid dune slacks. Species that are a primary reason for selection of this site include narrow-mouthed whorl snail (*Vertigo angustior*), petalwort (*Petalophyllum ralfsii*) and fen orchid (*Liparis loeselii*)

Gower Commons SAC[20]

The key habitat features for which the Gower Commons SAC is designated as a SAC include northern Atlantic wet heaths, European dry heaths and Molinia meadows. Species that are a primary reason for selection of this site include southern damselfly (*Coenagrion mercuriale*) and marsh fritillary butterfly (*Euphydryas (Eurodryas, Hypodryas) aurinia*)

Gower Ash Woods SAC[21]

Gower Ash Woods comprises one of the most extensive areas of *Tilio-Acerion* forest in Wales and is near the western extreme of the habitat's range in the UK. The woods are formed along a series of largely inter-linked valleys and ravines cut into Carboniferous limestone, and also on coastal slopes and cliffs with unique transitions through scrub to sand dunes, freshwater marsh and saltmarsh.

Bristol Channel Approaches SAC[22]

The Bristol Channel Approaches SAC lies along the south-west coasts of Wales and England. This site straddles the Bristol Channel from Carmarthen Bay in the north to the northern coasts of Devon and Cornwall in the south. Designated for the protection of harbour porpoise (*Phocoena phocoena*), this site supports an estimated 4.7% of the UK Celtic and Irish Sea (CIS) Management Unit (MU) population. This site is recognised as important for porpoises particularly during the winter when high densities persistently occur throughout the site.

[17]Carmarthen Bay SPA. Full citation available from: [Last accessed October 2024]

[18] Carmarthen Bay and Estuaries SAC. Full citation available from: [Last accessed October 2024]

[19] Carmarthen Bay Dunes SAC. Full citation available from: [Last accessed October 2024]

[20]Gower Commons SAC. Full citation available from: [Last accessed October 2024]

[21] Gower Ash Woods SAC. Full citation available from: [Last accessed October 2024]

[22]Bristol Channel Approaches SAC. Full citation available from: [Last accessed October 2024]

4.2 Relevant site baseline

Updated biodiversity records were received from Aderyn on 17th September 2024 to inform the EcIA. The search included data from within 2km of the scheme for:

- Local Wildlife Sites (LWS), Local Nature Reserves (LNRs) and Ancient Woodland Sites;
- Records of protected and notable flora and fauna species (protected species included all those protected by European or UK law, and notable species included those identified as being of Principal Importance, as listed in response to Section 7 of the Environment (Wales) Act 2016);
- Section 7 Priority Habitats; and records of Invasive Non-Native Species (INNS) as listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) and The Invasive Alien Species (Enforcement and Permitting) Order 2019.

The survey area for ecological survey has covered the entire survey area as shown in Figure 1 which covered land required for the original mixed-use development comprising the hotel to the north and the residential units to the south and eco-park to the east. The hotel and residential applications for outline planning are now being submitted separately, but the field surveys for each application cover the wider area with the ecological impact assessment tailored for each application and mitigation recommended considering the requirements of the entire site.

Habitats on site are dominated by grassland and scattered and dense scrub, with areas of woodland to the north and western extents of the site, see Figure 3 for the results of the Extended Phase 1 Habitat Survey. From the desk and field results, it was considered that site may be functionally linked and capable of supporting populations of birds for which the Ramsar and SPA are designated.

The site has been extensively surveyed over the last 15 years, to provide baseline information for ecological receptors and to assess impact for previous applications. Despite the validity of these reports having expired in line with CIEEM guidance, the following reports have been reviewed to inform the HRA;

- 2007 Ecological Assessment Report;
- 2013 Habitats Regulations Assessment;
- 2013 Reptile Survey Note;
- 2013 Water Vole Survey Report;
- 2015 Water Vole Survey Report;
- 2017 Ecological Survey Update Report;
- 2018 Water Vole Mitigation Strategy and Method Statement;
- 2018 Ecological Baseline Report (for the Llanelli Wellness and Life Science Village);
- 2020 Ecological Appraisal Report (for the proposed Machynys Central Housing and Machynys Eco Park developments);
- 2020 Machynys Hotel Utilities and Drainage Strategy1; and
- 2021 Water Framework Directive (WFD) Assessment
- 2021 Machynys Hotel Ecological Impact Assessment (EcIA)[23]
- 2023 Mixed-use Development at Machynys, Preliminary Ecological Proposal[24]

Based on desk study, field study and previous reports, the site is considered suitable for breeding bird and wintering birds, with previous surveys indicating a range of avian species of conservation concern being present. Furthermore, the developed scrub on the southern boundary alongside the ditch could provide resting opportunities for otter (*Lutra lutra*), with previous surveys reporting evidence of otter within the

[23] Arup (June 2021) Machynys Hotel, Ecological Impact Assessment

[24] Arup (November 2023) Mixed-use Development at Machynys – Preliminary Ecological Appraisal.

southeastern boundary and utilizing the nearby golf course, adjacent to south of the site boundary. Otter is also a mobile Annex II species of the Carmarthen Bay and Estuaries SAC, and due to the potential for otter to move through the site, may also impacted by the proposed development.

The next section will now detail the relevant Phase 2 surveys for assessing potential impacts to qualifying features described above.

4.2.1 Breeding bird

Previous surveys/reports

Breeding bird surveys in 2021 were carried out on the eastern area of the site, with the previous study boundary shown in Figure 1 of the Breeding Bird Report[25]. Territories of 19 species were identified, 16 of which were within the site. Territories included Schedule 1 species Cetti's warbler (*Cettia cettia*), Section 7 species song thrush (*Turdus philomelos*) and dunnock (*Prunella modularis*), two red list species (Wales) whitethroat (*Curruca communis*) and willow warbler (*Phylloscopus trochilus*), and amber listed species long tailed tit (*Aegithalos caudatus).* Twelve further non-breeding species were logged within or in close proximity to the site, none of which were listed on Carmarthen Bay and Estuaries SPA and the Bury Inlet SPA and Ramsar site designation.

2024 Survey results

The survey methods were derived from current best practice as described in Bird Survey Guidelines, as appropriate for assessing ecological impacts[26]. Surveys consisted of walking pre-defined transect routes in all accessible habitat types. Surveys were undertaken on six occasions across March, April, May, June and July 2024, with at least two weeks between surveys, including a singular dusk to detect nocturnal or crepuscular species. The specific dates, timings of the surveys and weather conditions are provided in Appendix B of the Breeding Bird Survey Report. The transect route was walked in the morning (except for the dusk survey, which was carried out half an hour after sunset) between dawn and 10am, when levels of avian activity (particularly singing) are likely to be at their highest. The transect was walked in the opposite direction on alternative visits, to balance any temporal variation in behaviour levels.

A total of 60 species were recorded during the breeding bird surveys between March and July 2024. Of the 60 species recorded, 23 (38.3 %) were considered to be likely breeding on-site, based upon their behaviour and habitats present. One Schedule 1 species, Cetti's warbler, was recorded. Singing individuals were consistently recorded across the site and throughout the survey period in dense bramble and woodland habitat on-site. As such, it is assumed that there are a minimum of four breeding territories on-site.

No species were recorded on-site during the breeding season, which are listed as qualifying features of nearby designated SPA and Ramsar site. Oystercatcher was recorded off-site, situated at Machynys Ponds during the March survey. This is a qualifying species as identified within Burry Inlet Ramsar designation for international/national important populations during winter. No breeding territories are assumed present. A single shoveler breeding territory is assumed present off-site on Machynys Ponds. This species is identified under the Burry Inlet Ramsar as a possible future consideration under criterion 6 (species with peak counts in winter). Two wintering species listed under Article 4.2 of the Burry Inlet SPA – shoveler and shelduck – were recorded off-site on Machynys Ponds during the survey period.

Species recorded on-site which qualify under wintering waterfowl assemblages of the Burry Inlet Ramsar and SPA comprise greylag goose (*Anser anser*), mallard (*Anas platyrhynchos*) and snipe (*Gallinago gallinago*), coot (*Fulica atra*), tufted duck (*Aythya fuligula*), little egret (*Egretta garzetta*), little grebe (*Tachybaptus ruficollis*), great crested grebe (*Podiceps cristatus*), grey heron (*Ardea cinerea*), cormorant (*Phalacrocorax carbo*), shelduck, gadwall (*Mareca strepera*) and oystercatcher.

[25] Arup (2021). Machynys Hotel. Breeding Bird Survey Report 2021

[26] Bird Survey & Assessment Steering Group. (2023) Bird Survey Guidelines for assessing ecological impacts, v.0.1.6. Available at: https://birdsurveyguidelines.org/ [Accessed July 2024].

A total of nine bird species were recorded that are placed on the Birds of Conservation Concern (BOCC5[27]) Red List and twelve species that are recorded on the Birds of Conservation Concern Wales (BoCCW4[28]) Red List. Three species, house sparrow (*Passer domesticus*), greenfinch (*Chloris chloris*) and skylark (*Alauda arvensis*) within the former and four species; goldcrest (*Regulus regulus*), greenfinch, willow warbler and whitethroat (*Sylvia communis*) within the latter are considered to be breeding on-site.

Twenty species were recorded on the BOCC5 Amber List and fourteen species on the BoCCW4 Amber list. Seven species within the former and six species within the latter are considered breeding on-site. The remaining species are Green listed. Ten species of principal importance were recorded, with five species; bullfinch (*Pyrrhula pyrrhula*), dunnock, house sparrow, skylark and song thrush considered to be breeding on-site.

Five breeding species were recorded which are considered to be of conservation significance within South Wales (Gwent, Glamorgan and Carmarthenshire). Cetti's warbler was the one breeding species present on-site to allow the designation of a Wildlife Site; however, this species is relatively widespread and ubiquitous within South Wales.

In general, the species recorded on-site are a typical assemblage of breeding birds associated with woodland, scattered trees, scrub and hedgerow habitats. The most important habitats for breeding birds on-site were deemed to be the areas of dense vegetation, including the woodland and scrub area which dominates the site, as well as patches of scattered trees, scrub which line the site boundaries. These are considered the most important due to the high density of notable species and breeding territories in these locations.

A large number of registrations and potential breeding territories were also recorded outside of the site in adjacent woodland habitat, which is scattered throughout the golf course, as well as Machynys Ponds which is designated as a SSSI and cited[29] for supporting a range of bird species.

Full detail regarding the breeding bird surveys can be found in the Breeding Bird Survey Report[30].

4.2.2 Wintering birds

Wintering bird surveys were undertaken in November 2023 to mid-March 2024 to determine the assemblage, numbers and distribution of wintering birds within the survey area. The surveys were completed in line with the methods detailed within the Bird Survey Guidelines[31]. The walkover covered all parts of the site, with particular focus on habitats within the survey area that may be used by waterbirds associated with the nearby designated sites.

A total of 40 species were recorded on-site during the wintering bird surveys. With the exception of herring gull (*Larus argentatus*), all records of waterbirds on-site comprised single birds seen on one occasion only (See Table 2 in Wintering Bird Report[33]). Three Cetti's warblers (a Schedule 1 breeding species) recorded on-site in March were noteworthy, although the species is Green-listed in both Wales and the UK. A common crossbill (*Loxia curvirostra*), recorded in January, was flying over the site. All other species recorded are common and widespread and are typical of the mosaic of habitats present on site. There was no apparent influence of tidal state on the assemblage or numbers of species recorded on-site.

Off-site, records of notable species/aggregations primarily comprised waterbirds and were focussed on the ponds to the south, within the golf course. Up to two Cetti's warblers were also recorded. A range of

[27] Stanbury, A., Eaton, M., Aebischer, N., Balmer, D., Brown, A., Douse, A., Lindley, P., McCulloch, N., Noble, D., and Win I. (2021) The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain. British Birds 114: 723-747. Available online at https://britishbirds. co.uk/content/status-our-bird-populations.

[28] Johnstone, I.G., Hughes, J., Balmer, D.E., Brenchley, A., Facey, R.J., Lindley, P.J., Noble, D.G. and Taylor, R.C. Online First. Birds of Conservation Concern Wales 4: the population status of birds in Wales. Milvus: the Journal of the Welsh Ornithological Society. Available at: https://tinyurl.com/BoCCW4

[29] Machynys Ponds SSSI. Full citation available from: Machynys Ponds SMS (naturalresources.wales) [Last accessed October 2024]

[30] Arup (September 2024) Breeding Bird Survey Report.

[31] Bird Survey & Assessment Steering Group (2023) Bird Survey Guidelines for assessing ecological impacts, v.1.1.1. https://birdsurveyguidelines.org

waterbirds were recorded, primarily comprising low numbers of common species occurring irregularly across the survey period (See Table 2 in Wintering Bird Report).

The sole qualifying species of the Burry Inlet Ramsar/SPA/SSSI logged with any regularity was shoveler, which was observed during three of six surveys on the pond off-site to the south, with a maximum of 26 present (See Table 2 in Wintering Bird Report). This count represents:

- 11.3% of the Burry Inlet SPA population, based upon 5-year peak mean of five-year average peaks for the years 1985/86 to 1989/90; and,
- 5.5% of the Burry Inlet Ramsar population, based upon 5-year peak mean of five-year average peaks for the years 1998/9 to 2002/3; and,
- 18.1% of the Burry Inlet SSSI population, based upon 5-year peak mean of five-year average peaks for the years 1982/83 to 1986/87.

However, using more recent annual counts provided by WeBS[32] between years 2018/19 to 2022/23, this count represents 26% of the Burry Inlet SPA/Ramsar/SSSI population.

A single teal, which is a qualifying species of the Burry Inlet SPA/SSSI, was recorded on one survey only, also on the ponds off-site to the south. No other qualifying species of the Burry Inlet Ramsar/SPA/SSSI were recorded during the surveys.

Qualifying species cited within Machynys Ponds SSSI and recorded during the wintering bird surveys comprise water rail, coot and tufted duck, although these species were recorded infrequently and in low numbers.

Tidal state appeared to have little influence on the numbers or assemblage of species recorded. No waders were recorded off-site.

Full detail regarding the wintering bird surveys can be found in the Wintering Bird Survey Report[33].

4.2.3 Otter

A review of previous surveys[34] found otter were likely active within and adjacent to the western area of the site in 2020. Potential otter pathways, old otter spraints and potential feeding remains were found along with footprints. The ditch which is seasonally wet, running along the southern boundary of the site (labelled 'waterbody 1' within the Ecological Appraisal Report[34] and was found to have evidence of otter use (footprints), however was scoped out of the survey effort in 2024 due to being unsuitable for resting/breeding otter, with consideration that otter may only use it for commuting purposes. Otter were found to use the larger waterbody/lake to the south within the golf course. These field signs and all previously surveyed waterbodies are shown on Figure 4 within the Ecological Appraisal Report[34].

The updated PEA walkover[13] identified no suitable habitat within the site boundary for breeding otter, although scrub and woodland on the southern boundary of site adjacent to the golf course could provide opportunities for resting. However, there are watercourses and large waterbodies in close proximity, including the New Dafen River (250m north) and a series of golf course ponds/lakes (27m south) which provide suitable habitat for otter. These habitats are connected to the site via the seasonally wet ditch to the south, which is located approximately 40m south southwest of the ponds.

The first survey visit was carried out on the 25th and 26th June 2024, and the second survey visit was carried out on the 28th and 29th August 2024. The survey included four waterbodies (ponds/lakes) and two watercourses (ditches) which fall outside the site but within 250m of the site boundary. These waterbodies/watercourses were identified through a desk study of publicly available aerial imagery, 1:25,000 scale Ordnance Survey (OS) data and informed by the PEA[13] survey results. The updated desk study returned

[32] Burry Inlet SPA. Annual peak counts of species. Available from: https://app.bto.org/webs-reporting/numbers.jsp?locid=LOC652309 [Accessed October 2024]

[33] Biome (May 2024) Mixed use development at Machynys: Wintering Bird Survey Report.

[34] Ecological Appraisal Report, Arup (2020) Machynys, Issued 15/10/2020

two records, comprised a spraint at Delta Lakes in 2022, located approximately 0.45km north of the hotel outline application boundary and visual sighting of otter 1.9km northwest of the site boundary in 2014. It should be noted that otters have been well documented on social media within the recent years to be using Delta Lakes and the Llanelli Wetland Centre, and thus the local records are likely underrepresenting otter activity within the wider area.

Otters have been regularly crossing over the B4304 next to the flood gate in order access to Delta Lakes, and there has been a series of roadkill events, the most recent in December 2023 at this location, prompting public concern. CCC have installed a road sign, and an otter mural has recently been painted on the pump house to inform users that otters regularly cross this road. More recently, based on field survey information from CCC, it is suspected that otters are commuting from Delta Lakes using retained parcels of scrub/wooded habitat between the Llanelli Wellness Village and Delta Lakes Enterprise Area across the B3404 to access the site in the location of the proposed hotel and commute towards southern ponds and wider area.

The survey results have confirmed the presence of foraging and commuting otter across the survey area within the golf course. Signs of otter were recorded on two moderate suitability waterbodies, consisting of old and fresh signs (spraints), a possible slide and a potential inactive resting place (couch). Although active breeding/resting sites were not confirmed on site, it is considered that suitable habitats are present, particularly around the more wooded areas of ponds 1b / 1c (See Figure 2 of the Riparian Report[35]). The wooded areas close to the waterbodies were not accessible for their entire extents in this area, therefore additional field signs could have been missed. In addition, given the proximity of the survey area to the Carmarthen Bay and Estuaries SAC (in which otter are a feature), it is likely that otter may commute through the wider area via the river and ditch network, and find areas of temporary refuge within the isolated scrubby woodland around/within the ponds, which are located approximately 40m southwest of the drainage ditch which borders the golf course and survey area boundary, indicating potential connectivity/likelihood of otters on site. Full detail regarding the riparian surveys can be found in the Riparian Survey Report[35].

[35] Arup (September 2024) Mixed use development at Machynys: Riparian Survey Report.

5. Stage 1 – Screening: Identification of Likely Significant Effects

5.1 Identification of sites potentially affected by the proposed works

Figure 2 shows the location of the project in relation to International Sites within 10km of the proposed works. International Sites identified under the criteria in Section 2 can be found within the scoping assessment in Table 1 below.

Table 1: International Sites Screened into Stage 1 of HRA

Site	Distance	Screeened into Stage 1?	Justification
Carmarthen Bay and Estuaries SAC	357m (southwest)	Y	Carmarthen Bay is an extensive shallow bay with a wide variety of seabed types, including mud, sand, and rock, although the majority of the seabed is sandy. The SAC includes Helwick Bank, a linear shallow subtidal sandbank that is unusual in being highly exposed to wave and tidal action. The Burry Inlet and Three Rivers system provides a migratory route for salmonids, river lampreys (*Lampetra fluviatilis*), sea lamprey (*Petromyzon marinus*), shad (*Alosa alosa, and Alosa fallax*), and otter (*Lutra lutra*). The habitat on-site and wider area may also contain functionally linked habitat in which qualifying features, such as otters, which are known to be present within the golf course and wider area. During construction and operation, otters utilizing the site and wider area may be subject to disturbance and displacement. Furthermore, habitats of the Carmarthen Bay and Estuaries SAC are hydrologically connected to the site, through the drainage ditches and ponds present on the golf course could therefore be affected be pollution and or sedimentation that occurs within the site during construction. Therefore, Carmarthen Bay and Estuary SAC has been scoped in for further screening.
Burry Inlet Ramsar	367m (southwest)	Y	Burry Inlet Ramsar is designated for its wintering bird assemblages and species populations. The habitat on-site and wider area was noted to contain suitable habitat in which qualifying features, such as wintering birds could utilise. During construction and operational activities, wintering birds utilising the site and wider area may be subject to disturbance and displacement. Therefore, Burry Inlet Ramsar has been scoped in for further screening.
Burry Inlet SPA	367m (southwest)	Y	Burry Inlet SPA is designated for its biogeographic population of regularly occurring migratory species as well as supporting at least 20,000 waterfowl. The habitat on-site and wider area was noted to contain suitable habitat in which qualifying features, such as wintering birds could utilise. During construction and operational activities, wintering birds utilising the site and wider area may be subject to disturbance and displacement. Therefore, Burry Inlet Ramsar has been scoped in for further screening.
Gower Commons SAC	5.3km (south)	N	Gower Commons SAC is designated for its northern Atlantic wet heaths, European dry heaths and Molinia meadows, and is situated approximately 5.3km south of the site, located on the southern side of the River Loughour (Burry Inlet). No likely terrestrial or hydrological pathway for effects is considered due to the significant distance and designation feature. As such, no likely significant effects are considered, and Gower Commons SAC has been scoped out of this HRA at Stage 1 – Screening; this designation is not further considered within this HRA.
Gower Ash Woods SAC	(5.5km south)	N	Gowe Ash Woods SAC is designated for its Tilio-Acerion forest and is situated approximately 5.5km south of the site, located on the southern side of River Loughour (Burry Inlet). No likely terrestrial or hydrological pathway for effects is considered due to the significant

Site	Distance	Screeened into Stage 1?	Justification
			distance and designation feature. As such, no likely significant effects are considered, and Gower Ash Woods SAC has been scoped out of this HRA at Stage 1 – Screening; this designation is not further considered within this HRA.
Carmarthen Bay Dunes SAC	5.7km (southwest)	N	Carmarthen Bay Dunes SAC is designated for its dune grasslands, along with dunes with creeping willow (*Salix repens ssp. argentea (Salicion arenariae*), shifting dunes, humid dune slacks, fen orchid (*Liparis loeselii*), petalwort (*Petalophyllum ralfsii*), Shifting dunes along the shoreline with Ammophila arenaria ('white dunes') and Narrow-mouthed whorl snail (*Vertigo angustior*). Bristol Channel Approaches SPA is designated for harbour porpoise and Carmarthen Bay SPA is designated for its regularly use by 1 % or more of the biogeographic population of a regularly occurring migratory species: common scoter (*Melanitta nigra*). The existing drainage comprises a dry ditch located towards the southern extent of the outline application boundary which separates the site and golf course and has been noted to hold water during the wetter season. Plant records confirm that this existing ditch/watercourse is an outfall to the Welsh Water surface water sewer network, located to the south of the site. This drainage ditch outfalls into the series of ponds and drainage ditches present within the golf course to the south of the site, with the outfall into the Burry Inlet located approximately 900m south of the site. Despite these sites being hydrologically connected through the River Loughour (Burry Inlet), any pollution and/or sedimentation events created by the proposed works during construction and/or operation in the absence of mitigation is likely to be intercepted by various drainage ditches / ponds and significantly diluted before it reaches these sites. As such, no likely significant effects are considered, and Carmarthen Bay Dunes SAC, Bristol Channel Approaches SPA and Carmarthen Bay SPA has been scoped out of this HRA at Stage 1 – Screening; these designations are not further considered within this HRA.
Bristol Channel Approaches SAC	(6.0km west)	N	
Carmarthen Bay SPA	8.8km (west)	N	

The features for which the international sites which are scoped into Stage 1 of HRA screening have been designated, are summarised in Table 2 below. The table also contains a summary of the conservation objectives and the sites' vulnerabilities.

NRW use the term "favourable condition" for the condition represented by the achievement of the conservation objectives, in other words the desired condition for a designated habitat or a species on an individual site. Full details of quality/importance, conservation objectives and for the designated sites are provided in advice from NRW/Natural England under Regulation 33 of the Habitat Regulations[36],[37],[38],[39].

[36]Carmarthen Bay and Estuaries European Marine Site (2018). Advice provided by Natural Resources Wales in fulfilment of Regulation 37 of the Conservation of Habitats and Species Regulations 2017. Available from: https://cdn.naturalresources.wales/media/687995/eng-carmarthen-bay-and-estuaries-reg-37-report-2018.pdf [Accessed October 2024]

[37] Carmarthen Bay and Estuaries SAC (2018) Indicative site level feature condition assessments. Available from: https://cdn.naturalresources.wales/media/684382/carmarthen-bay-estuaries-sac-ica-2018.pdf [Accessed October 2024]

[38] Carmarthen Bay and Estuaries EMS (2012) Management Scheme Technical Annex 1: Background. Available from: CBE-EMS-MS_TA1_May2012-wkg-draf.pdf_safe.pdf [Accessed October 2024]

[39] Carmarthen Bay and Estuaries EMS (2012) Management Scheme Technical Annex 2: Assessment of Activities, Pressures and Threats. Available from: CBE-EMS-MS_TA2_May2012-wkg-draft.pdf_safe.pdf [Accessed October 2024]

Table 2: Features, conservation objectives and threats / vulnerabilities of International Sites screened into Stage 1.

Feature	Quality and Importance	Conservation Objective	Threats and Vulnerabilities
Carmarthen Bay and Estuaries SAC			
Annex I habitats that are a primary reason for selection of this site			
Sandbanks which are slightly covered by sea water all the time (1110)	Carmarthen Bay and Estuaries on the south coast of Wales includes the sandbank of Helwick Bank, a linear shallow subtidal sandbank that is unusual in being highly exposed to wave and tidal action. The animal communities found in and on the bank reflect these conditions, being tolerant of high levels of disturbance. Within Carmarthen Bay there are also several other smaller sandbanks in relatively shallow waters, which support a range of species (including bivalves, amphipods and worms), many of which spend most of their time wholly or partly buried in the sediment. The sandbank feature in this site comprises the Helwick Bank and associated sediments During the 2017 Carmarthen Bay & Estuaries SAC feature condition assessment, this feature was assessed to have **unfavourable** condition as a result from water quality issues. It should be noted this confidence measure is low due to old data being utilised.	To achieve favourable conservation status all the following, subject to natural processes, need to be fulfilled and maintained in the long-term. If these objectives are not met restoration measures will be needed to achieve favourable conservation status: **1) Range** The overall distribution and extent of the habitat features within the site, and each of their main component parts is stable or increasing. **2) Structure and Function** The physical biological and chemical structure and functions necessary for the long-term maintenance and quality of the habitat are not degraded. Important elements include; - geology, - sedimentology, - geomorphology, - hydrography and meteorology, - water and sediment chemistry, - biological interactions. Contaminant levels in the water column and sediments derived from human activity to be: - at or below existing statutory guideline concentrations - below levels that would potentially result in increase in contaminant concentrations within sediments or biota - below levels potentially detrimental to the long-term maintenance of the feature species populations, their abundance or range. For Atlantic saltmeadows this includes the morphology of the saltmarsh creeks and pans. **3) Typical Species** The presence, abundance, condition and diversity of typical species is such that habitat quality is not degraded. Important elements include: - species richness - population structure and dynamics, - physiological heath, - reproductive capacity - recruitment, - mobility - range As part of this objective it should be noted that: • populations of typical species subject to existing commercial fisheries need to be at an abundance equal to or greater than that required to achieve maximum sustainable yield and secure in the long term • the management and control of activities or operations likely to adversely affect the habitat feature is appropriate for maintaining it in favourable condition and is secure in the long term.	Activities currently believed to be pressures on the Carmarthen Bay and Estuaries EMS, based on CCW Regulation 35 Advice (2018) are stated above in the Burry Inlet SPA. Threats and vulnerabilities specifically identified within Nature 2000 Data Forms and Ramsar Information Sheets: - Developments in fishing practices and target species - Most of the potential threats come from fisheries and related activities such as shellfish management and access issues related to mussel and cockle gathering - Aggregate dredging may have an effect locally on the biology of Helwick Bank, and in conjunction with other coastal defence works may also affect sediment budgets and characteristics over a wider area. Operations within the SAC highlight the following as pressures and/or threats: - Coastal settlements giving rise to localised pressures on the marine environment; - Extensive reclamation of saltmarshes; - Sea defences, including sea walls, rock armour, gabions and groynes; - Protected coastal railway tracks acting as coastal defences and preventing the inland migration of coastal habitats; - Extensively and, at times intensively grazed saltmarshes; - High levels of bait collection, including of marine worms and soft shelled ‘peeler’ crab; - Hypertrophic estuaries; - Hyper nutrification in the upper Loughor Estuary; - Residual legacy heavy metals from industry and redundant coalmines in estuary catchments; - Decline in Salicornia populations since 1982, possibly caused by changes in the main channel and vehicular erosion; - Extraction of sand from the Helwick Bank for aggregate, exacerbating losses caused by natural processes
Estuaries (1130)	Carmarthen Bay and Estuaries provides an example of a large estuarine site on the south coast of Wales, encompassing the **estuaries** of the Rivers Loughor, Tâf and Tywi (coastal plain estuaries) and the Gwendraeth (a bar-built estuary). These four estuaries form a single functional unit around the Burry Inlet, with important interchanges of sediment and biota. The estuaries of this site support a range of subtidal and intertidal sediments that grade from sand at the mouth to mudflats in the upper estuary. The fauna of the sediments varies but includes communities with polychaete and oligochaete worms and areas with extensive cockle beds and other bivalve molluscs. This site has a range of undisturbed transitions to coastal habitats. The estuary feature within this site comprises the Burry Inlet / Lougher Estuary and the Three Rivers system of the Taf, Tywi and Gwendreath. During the 2006-07 Carmarthen Bay & Estuaries SAC feature condition assessment, this feature was assessed to have **unfavourable** condition as a result from diffuse water pollution.		
Mudflats and sandflats not covered by seawater at low tide (1140)	Carmarthen Bay and Estuaries on the south coast of Wales includes extensive areas of intertidal mudflats and sandflats. Large areas of these intertidal flats are dominated by bivalves. In areas of fine sand cockles *Cerastoderma edule* are abundant, along with other bivalves, amphipods and worms. In muddier sediments the sand-gaper *Mya arenaria*, peppery furrow-shell *Scrobicularia plana* and mud-snail *Hydrobia ulvae* are also found in large numbers. The lower Loughor Estuary is one of the few places in the UK where the worm *Ophelia bicornis* has been found. There are also beds of the nationally scarce dwarf eelgrass *Zostera noltei*. Intertidal mud & sand flats are distributed throughout large shallow inlets and bays and estuaries within the site. Sediment flats in open coast bays are both extensive and, in some locations, restricted to the mid to lower shore by rock features at the base of cliffs. Flats in estuaries are mostly extensive mud flats fringing inlets and estuaries. During the 2017 Carmarthen Bay & Estuaries SAC feature condition assessment, this feature was assessed to have **unfavourable condition** as a result from water quality issues.		
Large shallow inlets and bays (1160)	Carmarthen Bay, off the south Wales coast is an extensive shallow bay. Throughout the bay physical conditions vary considerably. Salinity varies from low (at the estuaries) to fully marine, there are gradients in wave action from sheltered to exposed, and strong tides sweep exposed headlands whilst other areas are sheltered from currents. There is a wide range of seabed types, including mud, sand and rock, although the majority of the seabed is sandy. The sediment supports a large number of species, including bivalve molluscs, worms, burrowing urchins,		

Feature	Quality and Importance	Conservation Objective	Threats and Vulnerabilities
	brittlestars and sand-stars. The large shallow inlets and bays feature in this site is comprised of Carmarthen Bay. During the 2017 Carmarthen Bay & Estuaries SAC feature condition assessment, this feature was considered to be in **unfavourable condition** as a result from diffuse and point source pollution.		
Salicornia and other annuals colonizing mud and sand (1310)	Carmarthen Bay and Estuaries in south Wales is selected as representative of pioneer glasswort Salicornia spp. saltmarsh in the south-west of the UK. It forms an integral part of the estuarine system, supporting extensive pioneer communities and contributing to a complete sequence of saltmarsh vegetation, including transitions to upper saltmeadow and to important sand dune habitats. The Salicornia and other annuals feature are distributed sporadically in areas of suitable habitat within the estuaries. During the 2017 Carmarthen Bay & Estuaries SAC feature condition assessment, this feature was considered to be in **favourable** condition.		
Atlantic salt meadows (Glauco-Puccinellietalia maritimae)	This extensive site in south Wales has a complete sequence of saltmarsh vegetation, from pioneer vegetation through to upper saltmarsh transitions. The grazed saltmarshes include upper margins with sea rush (*Juncus maritimus*) and marsh-mallow (*Althaea officinalis*), which are a particularly distinctive ecological feature of this site. The area is also important for transitions from saltmarsh to sand dune and other habitats. The Atlantic salt meadows feature is distributed widely throughout within the estuaries and includes the largest expanse of salt-marsh in Wales in the Burry Inlet. During the 2017 Carmarthen Bay & Estuaries SAC feature condition assessment, this feature was considered to be in **unfavourable condition** as a result from grazing and water quality issued.		
Annex II species that are a primary reason for selection of this site			
Twaite shad (*Alosa fallax*)	Twaite shad migrate though the waters of Carmarthen Bay and Estuaries cSAC to reach spawning sites in the Afon Tywi. The Taf-Tywi-Gwendraeth estuary is also an important nursery area for juveniles and it is likely that twaite shad feed in the inshore waters of Carmarthen Bay. During the 2017 Carmarthen Bay & Estuaries SAC feature condition assessment, this feature was considered to be in **unfavourable condition** based on freshwater population variables (2015 Monitoring Report: Thomas & Garrett, 2012) and marine habitat (WFD 2015 assessments & expert judgement). Key issues relating to this condition being water quality.	To achieve favourable conservation status all the following, subject to natural processes, need to be fulfilled and maintained in the long-term. If these **1) Population** The population is maintaining itself on a long-term basis as a viable component of its natural habitat. Important elements include: - population size - structure, production - condition of the species within the site. As part of this objective it should be noted that; Contaminant burdens derived from human activity are below levels that may cause physiological damage, or immune or reproductive suppression **2) Range** The species population within the site is such that the natural range of the population is not being reduced or likely to be reduced for the foreseeable future. As part of this objective it should be noted that: - Their range within the SAC and adjacent inter-connected areas is not constrained or hindered. - There are appropriate and sufficient food resources within the SAC and beyond.	
Annex II species present that are a qualifying feature, but not a primary reason for site selection[40]			
Sea lamprey (*Petromyzon marinus*)	Lampreys are a primitive type of fish that have a distinctive suckered mouth rather than jaws, quite unlike any other fish in Britain. Eel-like lampreys parasitise other fish; by fastening on to the living fish, lampreys rasp into the flesh and feed on the body fluids. Sea and river lampreys spend their adult lives in the sea or estuaries but spawn and spend the juvenile part of their life cycle in rivers. During the 2017 Carmarthen Bay & Estuaries SAC feature condition assessment, this feature was considered to be in **unfavourable condition** based on freshwater population variables (Monitoring Report: Thomas & Garrett, 2012) and marine habitat (WFD 2015 assessments & expert judgement). Key issues relating to this condition being water quality.		
River lamprey (*Lampetra fluviatilis*)			

[40] When undertaking an appropriate assessment of impacts at a site, all features of International importance (both primary and non-primary) need to be considered.

Feature	Quality and Importance	Conservation Objective	Threats and Vulnerabilities
Allis shad (*Alosa alosa*)	The allis shad is rare and declining throughout its range on the western coasts of Europe, from southern Norway to Spain, and in the Mediterranean eastwards to northern Italy. Relatively little information is available on the habitat requirements of allis shad in freshwater. It grows in coastal waters and estuaries but migrates into rivers to spawn, swimming up to 800 km upstream in continental Europe. However, allis shad do not readily traverse obstacles to migration such as dams or weirs, and this has been a major cause of their decline. Population declines in many parts of Europe have been attributed to the effects of pollution, overfishing and river obstructions to migration. During the 2017 Carmarthen Bay & Estuaries SAC feature condition assessment, this feature was considered to be in **unfavourable condition** based on freshwater population variables (2015 Monitoring Report: Thomas & Garrett, 2012) and marine habitat (WFD 2015 assessments & expert judgement). Key issues relating to this condition being water quality.	- The sites and amount of supporting habitat used by these species are accessible and their extent and quality is stable or increasing. **3) Supporting habitats and species** The presence, abundance, condition and diversity of habitats and species required to support this species is such that the distribution, abundance and populations dynamics of the species within the site and population beyond the site is stable or increasing. Important considerations include; - distribution - extent - structure - function and quality of habitat - prey availability and quality**.** As part of this objective it should be noted that; - The abundance of prey species subject to existing commercial fisheries needs to be equal to or greater than that required to achieve maximum sustainable yield and secure in the long term. - The management and control of activities or operations likely to adversely affect the species feature is appropriate for maintaining it in favourable condition and is secure in the long term. - Contamination of potential prey species should be below concentrations potentially harmful to their physiological health. - Disturbance by human activity is below levels that suppress reproductive success, physiological health or long-term behaviour. - For otter there are sufficient sources within the SAC and beyond of high quality freshwater for drinking and bathin.	
Otter (*Lutra lutra*)	Distribution of spraint records and reported sightings indicates that otters are frequent in tributaries of the Three Rivers estuaries and Burry Inlet / Lougher Estuary. Otter use of the open coast and estuary foreshores within the site is poorly known During the 2017 Carmarthen Bay & Estuaries SAC feature condition assessment, this feature was considered to be in **favourable condition** based on monitoring data, reports and expert judgement. Despite many of the species features assessed (i.e., range and supporting habitats) as unknown or unfavourable, the otter feature the population and range attributes were felt to be the most important elements with supporting habitats.		
Burry Inlet Ramsar			
Ramsar Criterion 5: Assemblages of international importance		The most recent version of the Ramsar Information Sheet does not detail any conservation measures. However, given the species listed within the Ramsar are also stated within the SPA designation which also lay within the same boundary, it is therefore assumed the conservation objectives listed for the Burry Inlet SPA are of similar nature for the Ramsar.	The most recent version of the Ramsar Information Sheet lists only erosion under "factors (past, present or potential) adversely affecting the site's ecological character", with the following amplification: Sea-level rise and/or changes in the frequency of storms, natural sediment transition as a result of the natural breach of the old 'training wall' and channel realignment causes changing patterns of sediment deposition and erosion. Studies suggest that overall erosion rates are more or less matched by sediment accretion. Erosion of /loss of *Salicornia* zone is occurring – loss of this early successional vegetation is changing the overall salt-marsh habitat distribution on the site. The response recorded against the question "Is the site subject to adverse ecological change?" is "No". The *Overview of the implementation of the Convention in the Western European region* report to the 6th Meeting of the Conference of the Contracting Parties notes unregulated digging for fishing bait as a negative factor for the site.
Species with peak counts in winter: 41,655 waterfowl (5-year peak mean 1998/99-2002/2003)			
Ramsar Criterion 6: Species/populations occurring at levels of international importance.			
Pintail	2,687 individuals, representing an average of 4.4% of the northwest European population (5-year peak mean 1998/9-2002/3)		
Oystercatcher	14,861 individuals, representing an average of 1.1% of the European and northwest African (wintering) population, (5 year peak mean 1998/9-2002/3)		
Burry Inlet SPA			
Article 4.2 - Wetland of International Importance		To achieve favourable conservation status all the following, subject to natural processes, need to be fulfilled and maintained in the long-term. If these objectives are not met restoration measures will be needed to achieve favourable conservation status.	Activities currently believed to be pressures on the Carmarthen Bay and Estuaries EMS, based on CCW Regulation 35 Advice (2018): - Levels of exploitation of ecologically important shellfish species (e.g. cockles, mussels and mussel seed, whelks, razor clams)
The site qualifies as it is regularly supporting, in winter, over 20,000 waterfowl. During the five-year period 1985/86 to 1989/90 an average peak of 48,100 birds was recorded, comprising 12,500 wildfowl and 35,600 waders.			

Feature	Quality and Importance	Conservation Objective	Threats and Vulnerabilities
Article 4.2 - Supporting internationally or nationally important wintering populations[41],[42]		a) The numbers of all SPA bird species are stable or increasing. b) The abundance and distribution of suitable prey are sufficient and appropriate to support the numbers of all SPA bird species. c) All SPA birds are allowed to inhabit their feeding grounds and resting areas with minimum disturbance and are allowed to move unhindered between them. d) All states of the Conservation Objectives for the supporting habitats and species, subject to natural processes, are fulfilled and maintained in the long-term. e) The management and control of activities or operations likely to be of significant effect to the oystercatchers, is appropriate for maintaining the feature at FCS and is secure in the long-term. Supporting habitats for bird species of the Burry Inlet SPA include: - Estuaries - Mudflats and sandflats not covered by seawater at low tide - Atlantic salt meadows - Salicornia and other annuals colonising mud and sand 'Large shallow inlets and bays' are the supporting habitat for the common scoter of the Carmarthen Bay SPA	- Creation & maintenance of hard engineered coastal defence works - Water pollution: diffuse and point source - Land claim - Grazing - Bait collection, particularly digging - High speed power craft (e.g. Jet skis) - Disposal of wastes & debris - Military activity Activities currently believed to be threats include: - Sea level rise - Coastal 'squeeze' - Aquaculture - INNS - Aggregate extraction - Mass cockle mortality events - Marine litter - Modifications to sediment transport - Short term planning policies and unsustainable development Poor public awareness, understanding or interest More information is needed on the distribution, timing and intensity of all activities, but in particular on: - Commercial fishing - Angling - Bait collection - Recreational high speed boating and water-sports - Off-road motor sports in intertidal areas - Unregulated wildfowling - Unregulated rubbish disposal (fly-tipping) - Unregulated foreshore development - Unregulated coastal protection & land claim Threats and vulnerabilities specifically identified within Nature 2000 Data Forms and Ramsar Information Sheets: - Shellfish activities such as management and access - Eutrophication issues - Salt-marsh grazing levels - Tourism, amenity and recreation activities in relation to the Millennium Coastal Park - Potential hydro-electric barrage scheme
Shelduck (*Tadorna tadorna*)	1,500 individuals, representing 2% of the British wintering population		
Wigeon (*Mareca penelope*)	6,200 individuals, representing 2% of the British population.		
Teal (*Anas crecca*)	1,000 individuals, representing 1% of the British population		
Pintail (*Anas acuta*)	1,900 individuals, representing 3% of the northwest European population and 7% of the British population		
Shoveler (*Spatula clypeata*)	230 individuals, representing 3% of the British population		
Oystercatcher (*Haematopus ostralegus*)	16,900 individuals, representing 2% of the East Atlantic Flyway (EAF) population and 6% of the British population.		
Grey plover (*Pluvialis squatarola*)	660 grey individuals, representing 3% of the British population		
Knot (*Calidris canutus*)	4,300 individuals, representing 1% of the EAF and 2% of the British population		
Dunlin (*Calidris alpina*)	8,200 individuals, representing 2% of the British population		
Curlew (*Numenius arquata*)	1,500 individuals, representing 2% of the British population		
Redshank (*Tringa totanus*)	1,200 individuals, representing 1% of the EAF and 2% of British population		
Turnstone (*Arenaria interpres*)	470 individuals, representing 1% of the British population.		

[41] Figures given are five-year average peaks for the years 1985/86 to 1989/90, except in the case of teal, where the figure is for the years 1988/89 to 1989/90 only

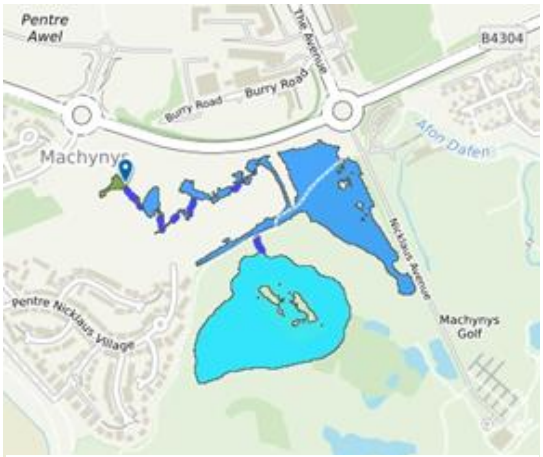
[42] No recent reports formally assessing the status Burry Inlet SPA features are available. The BTO publication *Waterbirds in the UK 2022/23* is the most contemporary data for most of the site's species features at the time of writing, though data for several feature species in Burry Inlet are not included. However, it is unclear whether this is a decrease in numbers of birds in the immediate geographical area or more a reflection of movement between the site and adjacent estuaries and open coast (Burton *et al*., 2010).

5.2 Potential Effects on the Proposed Works

The potential effects of the proposed works during construction and operation are considered in relation to Likely Significant Effects (LSE) that may arise on features of the Carmarthen Bay and Estuaries EMS comprising Carmarthen Bay and Estuaries SAC, Burry Inlet SPA and Burry Inlet Ramsar. A significant effect should be considered likely if it cannot be excluded in the light of the best scientific knowledge in the field and it might undermine a site's conservation objectives. A risk or a possibility of such an effect is enough to warrant the need for an Appropriate Assessment (Stage 2). Potential impact mechanisms or 'pathways' for effect for all features identified in Table 2 are included in Table 3 below.

Table 3: Pathways under consideration and Likely Significant Effects in the absence of mitigation

Pathways under consideration	Potential Effects of the Project in the absence of mitigation	Likely Significant Effects (LSE)	
		Construction	Operation
Air quality impacts	The proposed development has the potential to impact local pollutant concentrations of nitrogen dioxide (NO2) and fine particulate matter (PM10 and PM2.5) from vehicles and car park related emissions during both construction and operation. Elevated levels of NOx can have an adverse effect on vegetation, including leaf or needle damage and reduced growth. Deposition of pollutants derived from NOx emissions can contribute to acidification and/or eutrophication of sensitive habitats leading to loss of biodiversity. No air quality assessments have been carried out for this project, however, nearby development project 'Pentre Awel', located approximately 40m north of the site was subject to Environmental Impact Assessment (EIA) and subsequent air quality assessments. There is an AQMA (Air Quality Management Area) within 1.4km of the proposed site which means that air quality effects were assessed for construction traffic, construction activities (due to potential dust issues) and operational traffic and activities (such as use of combustion plant). The assessment carried out modelling and concluded that there was a medium risk at worst from construction dust, based on sensitive receptors (i.e.., residential dwellings). During operation, all of the predicted concentrations are below the annual mean objective (30µg/m3) and the impact is described as negligible at all receptors, including ecological. Given the nature and scale of Pentre Awel, which spans approximately 23 hectares of mixed-use development in contrast to the proposed hotel development, covering approximately 0.9 hectares; and the spatial distance between the site and internationally designated sites, it is considered that any changes in air quality would not result in any effects to qualifying habitats.	No LSE	No LSE
Water pollution, including sedimentation	There is the potential for the proposed works to result in a pollution incident e.g. oil/chemical pollution through spills during construction works or increase sedimentation leading to habitat degradation whilst working in or near the watercourse. A dry ditch is located towards the southern extent of the outline application boundary which separates the site and golf course and has been noted to hold water during the wetter season. Plant records confirm that this existing ditch/watercourse is an outfall to the Welsh Water surface water sewer network, located to the south of the site. ScalGO mapping displays (see Picture 1) that this ditch connects to the drainage within the golf club to the south and outfalls into the SSSI ponds. These ponds are interconnected via drainage ditches and eventually outfalls into the River Loughor (Burry Inlet).	LSE	No LSE

Pathways under consideration	Potential Effects of the Project in the absence of mitigation	Likely Significant Effects (LSE)	
		Construction	Operation
	 **Picture 1: ScalGo mapping of site drainage** Machynys Ponds SSSI is known to contain both qualifying and assemblage bird species of Burry Inlet SPA/Ramsar and is regularly noted to be used by otter, which is also a qualifying species for Carmarthen Bay and Estuaries SAC. There is a weak hydrological connection to Burry Inlet; however, any pollution and/or sedimentation events created during construction would likely be intercepted and significantly diluted by the various ponds and drainage ditches associated with the golf course before passing into Burry Inlet, with the outfall located approximately 958m from the drainage ditch. However, in the absence of mitigation, any pollution and/or sedimentation created during construction could lead to habitat degradation of the ponds and waterbodies which are known habitat which are utilised by species noted within the Carmarthen Bay and Estuaries EMS, such as shoveler which have been recorded in significant numbers. Approximately 1421m^2 of the proposed construction area is for SUDs, comprising rain gardens and channels which will be vegetated with native species that are appropriate for the area but that also fulfil the SuDS function. As such, it is not anticipated that there will be any impact from pollution resulting in habitat degradation on the statutory designated sites of international during operational phase.		
Spread of Invasive Non-Native Species (INNS) and disease	The update Phase 1 walkover and the NVC survey in 2024 identified Japanese knotweed (*Reynoutria japonica*) prevalent throughout the application site, with six stands being recorded during the survey (Target Numbers 1,4,5,6,7, and 8 in 6 as sown on Figure 3). These were located within grassland habitat, on woodland edges, and within scrub with TN 4 and TN5 being located within the proposed hotel development area. Japanese rose (*Rosa rugosa*) was also identified. Terrestrial INNS could be spread via construction machinery, or on construction workers' footwear, especially when working around watercourses. Despite there being a weak hydrological connection to Burry Inlet waterway through the various drainage ditches and ponds within the golf course, the brackish and tidal conditions of the Burry Inlet are unlikely to be suitable habitats for numerous aquatic and terrestrial INNS to establish. However, in the absence of mitigation, terrestrial and aquatic INNS could spread to adjacent habitat such as the golf course ponds and grassland habitats, which are known to have qualifying species of the Carmarthen Bay and Estuaries EMS. As such there is a risk that INNS could spread to adjacent habitats and could impact Annex 1 habitat associated with the international site from increased competition with INNS species. Annex II species	LSE	No LSE

Pathways under consideration	Potential Effects of the Project in the absence of mitigation	Likely Significant Effects (LSE)	
		Construction	Operation
	could similarly be affected by increased competition, loss of foraging and shelter opportunities and spread of pathogens.		
Human induced changes to hydraulic conditions	During the WFD assessment[43], impacts to hydromorphology were scoped out as the proposed development is outside of the waterbodies themselves and are not anticipated to result in any changes to flows or sediment transport. The proposed development site is currently an unused area of land, although previously developed, it could be considered as a greenfield site in terms of drainage. The peak flow rate of the rainfall runoff from the undeveloped site is the Greenfield Runoff Rate (GRR). As a result, appropriately sized SuDS features are required to allow the flow to be intercepted including rain gardens / bioretention systems, permeable paving, green roof and swales. As such, there will be no significant change to the hydraulic conditions of the international sites as a result of the proposals. No abstractions are proposed.	No LSE	No LSE
Loss of SAC, SPA and Ramsar habitat that supports qualifying species of the SAC, SPA and Ramsar.	There will be no direct loss on any of the SAC, SPA and Ramsar habitat due to the spatial distance separating the hotel application boundary and designated sites. The mosaic of grasslands, scrub and woodland provide suitable habitat for wintering birds; however, the area is open to the public and dog walkers which may reduce the suitability. As aforementioned, a total of 40 species was recorded during the 2023/24 breeding bird surveys. The assemblage predominantly comprised common and widespread species typical of the mosaic of habitats present on site. With the exception of herring gull, all records of waterbirds on-site were of single birds seen on one occasion only. The wintering bird survey indicated that a low density of birds used the entire site and survey area, but many are concentrated towards the east and west or boundaries of the site where more woodland and scrub are situated. Due to the lack of waterbodies on site there were no waterbirds recorded on site. Some estuarine birds, which form a feature of the Carmarthen Bay and Estuaries SPA and the Bury Inlet SPA and Ramsar site designation, will supplementarily feed and/or roost inland within arable fields and grassland areas. However, they also have specific requirements relating to the openness of the fields and field sizes, due to the predation risk associated trees, scrub and hedgerows providing cover for mammal and bird predators. The golf course between the site and the estuary/inlet to the south and east, provides large areas of open grassland with areas of rough grassland and large ponds, thus providing a significant area (approximately 84ha) of suitable supplementary foraging and high tide roosts for waders and wildfowl. There will be a permanent loss of habitat at the site totalling 9165m^2 but remaining retained habitats are extensive, and the golf course being more widely used by bird species associated with the Carmarthen Estuaries and Bay EMS. Given the low count of waterfowl recorded during the wintering bird surveys and suitable habitat present within the wider area, no likely significant impacts to SPA/Ramsar features of the Carmarthen Bay and Estuaries EMS are anticipated. Otters are a qualifying feature of the Carmarthen Bay and Estuaries SAC which lies approximately 356 m from the site. The mosaic of scrub and woodland connected to watercourses on the adjacent site offers suitable terrestrial habitat for otter either for resting places or holts. No evidence of otter was recorded during the 2024 surveys within the development site, but they are known to present within the ponds at the adjacent golf course. It is possible that they may use the ditch to the south of the Machynys site to commute to the dense scrub as a resting place. However, given the relatively isolated area	No LSE	No LSE

[43] Arup (2024). Machynys Hotel: Water Framework Directive (WFD) Assessment

Pathways under consideration	Potential Effects of the Project in the absence of mitigation	Likely Significant Effects (LSE)	
		Construction	Operation
	of the site being bordered between both residential dwellings and busy roads, and the site and wider area being frequently used by dogwalkers and golfing activities, habitat lost through the proposed development is not considered likely to significantly impact the qualifying feature of the Carmarthen Bay and Estuaries SAC.		
Physical disturbance of habitats used by SAC, SPA and Ramsar species	There is potential for waterfowl species utilizing the site and adjacent habitats, (i.e., Machynys Ponds SSSI) to be subject to disturbance through increased noise from construction activities, lighting and injury/mortality during construction. Furthermore, permanent disturbance during the operational phase by lighting, noise, bird collision or the potential increase in public presence which could result in adverse impacts relating to foraging success and subsequently on reproduction. It should be noted that birds present within the wider site, such as the golf ponds and associated landscape are likely subject to a moderate level of existing operational disturbance from the residential dwellings to the southwest of the site, as well the golf course related activities (i.e., pedestrian presence and regular maintenance). There is also potential for increased disturbance to otters utilising adjacent habitats through potential visual, noise/vibration and lighting impacts; and species mortality / injury, directly or through potential pollution events. During operation of the scheme there is potential for the new usage to result in increased disturbance to the watercourse through increased pedestrian and vehicle movements and lighting. Based on recent information provided by CCC, there is also a higher risk of otter mortality on the B3404 due to potential otter crossing point and increased hotel traffic.	LSE	LSE
Harm, disturbance, or displacement to faunal species		LSE	LSE

5.3 Identification of Other Plans and Project

The CCC planning portal[44] was used to search for planning applications within 1km of the project boundary, submitted within the last six months. Only planning applications with potential to have environmental impacts relevant to the identified designated site are considered. This for example excludes applications of very small scale works e.g. household scale (minor extensions), listed building applications, changes of use (that does not require faciliatory development) and applications relating to small-scale tree removals/surgery.

A total of 30 Llanelli Parish based planning applications have been returned from CCC within the last six months, dated from 09/04/24 to 09/10/24. Within these applications, none were identified to have environmental impacts relevant to the identified sites, taking into consideration both scale and distance of the applications and therefore no in combination effects are anticipated as a result of the proposed works. List of applications returned within this timeframe can be seen in Appendix C.

5.4 Screening decision of the plan or project

The risk of likely significant effects on the International Site from the project alone cannot be ruled out, and therefore an Appropriate Assessment (Stage 2) is required.

[44] Carmarthenshire County Council. Planning Portal Map. Available from: My Nearest - Planning information (gov.wales) [Last accessed October 2024]

6. Appropriate Assessment

This section considers the mitigation options proposed as part of the proposed works and the residual effects (if any) on the Carmarthen Bay and Estuaries EMS as identified in Section 6. These measures have been considered with regards to the conservation objectives set for the International Sites as outlined in Table 2.

6.1 General site best practice mitigation measures

As outlined in guidance produced by the Chartered Institute of Ecology and Environmental Management (CIEEM)[45] the mitigation hierarchy has been adopted for the proposed development. Avoidance of impact has been, where possible, secured through embedded design, with the retention of key ecological features. There is a risk that construction activities may inadvertently lead to dust, pollution events, or sediment run-off resulting in damage to those habitats (including designated sites and watercourses) that are within close proximity and / or are hydrologically connected to the construction footprint. These risks will be avoided or reduced through the application of standard best-practice pollution prevention techniques and methods.

6.1.1 Construction phase

6.1.1.1 Best Practice Construction Methods

Embedded mitigation includes environmental best practice working methods during the construction phase of the scheme that would avoid or reduce impacts to adjacent designated sites, habitats and species from pollution events, e.g. protection from contamination of surface water or dust deposition.

These measures will be described in detail in the Construction Environmental Management Plan (CEMP) for the development, and the adoption and implementation of these measures will be secured through adherence with the CEMP.

If any protected species or signs of protected species such as an otter holt, or other ecological features including new occurrences or increase in extent of INNS are encountered during the works, all work in the vicinity is to stop immediately and a suitably experienced ecologist contacted as soon as possible.

Toolbox Talks provided by a suitably experienced ecologist to all site personnel to inform them of ecological features at the site, including INNS, protected and notable species prior to the commencement of construction works. An associated registry of attendance will be signed and kept as a record and a copy of the toolbox talk left at the site office.

A specialist INNS Management Plan will be developed as part of the detailed CEMP for the treatment and/ or avoidance of these species. All machinery, equipment and footwear will be cleaned thoroughly before entering the site with a suitable disinfectant. In addition, all equipment and footwear will be thoroughly cleaned and disinfected when leaving site, particularly in areas where INNS have been located in accordance with Check, Clean, Dry[46] guidance.

The CEMP will include measures such as those contained within the Environment Agency's Guidance for Pollution Prevention 5 (PPG5)[47] and Pollution Prevention Guidelines 6 (PPG6[48]). All measures detailed in

[45] Chartered Institute of Ecology and Environmental Management (CIEEM) 2018. Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal & Marine. September 2018.

[46] https://www.nonnativespecies.org/what-can-i-do/check-clean-dry/

[47] Guidance for Pollution Prevention: Works and maintenance in or near water (GPP5), NetRegs. Available from: https://www.netregs.org.uk/media/1418/gpp-5-works-and-maintenance-in-or-near-water.pdf [Last accessed October 2024]

[48] Working at construction and demolition sites: PPG6, Pollution Prevention Guidelines, Environment Agency. Available from: https:/www.gov.uk/government/uploads/system/uploads/attachment_data/file/290139/pmho0412bwfe-e-e.pdf [Last accessed October 2024]

the agreed CEMP will be adhered to by contractors working on site. All construction activities will be carried out in accordance with guidance outlined within CIRIA best practice guidance[49].

The CEMP will contain the following best practice methods to mitigate the risk of pollution (as relevant):

- Spill kits deployed in the event of a spillage. In the event of a pollution incident, work will cease in the vicinity of the incident and contaminants must be cleaned up immediately.
- The storage and use of hazardous chemicals would be in accordance COSHH Regulations (1998);
- Environmentally friendly products will be used where possible;
- All waste materials will be disposed of in designated skips/areas;
- Emergency spill kits are to be maintained at every work location or be easily accessible at all times from a centralised location;
- Equipment to be stored on designated drip trays/bunded areas;
- All refuelling operations are to be undertaken at the site compound, at least 10m from any watercourse;
- Refuelling operations must always be manned, never left alone, or the fuel trigger jammed open;
- Hoses and valves to be checked regularly for signs of wear and renew as and when required. If a spill should occur, the following should be used: stop, contain and notify.
- Bulk cement and other fine powder materials are to be delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery;
- For smaller supplies of fine power materials bags are to be sealed after use and stored appropriately to prevent dust;
- Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use;
- Vehicles entering and leaving sites are to be covered to prevent escape of materials during transport;
- Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable);
- Constant monitoring of dust levels and adopting effective methods of work to prevent dust becoming airborne at the source for example: using wet sweeping methods to prevent accumulation of dust and mud and using effective exhaust ventilation and filtering to minimise potential dust pollution;
- All works will be undertaken during daylight hours to avoid disturbing nocturnal species where possible. Any required task lighting will be directed towards the ground and away from retained habitats;
- Excavations, trenches and holes will be covered when not being worked on and overnight to prevent entry by mammals such as otter, badger and hedgehogs. Where this is not possible exits and escape routes such as ramps or mammal ladders will be provided.
- All works will be fenced to allow the safe crossing of animals through the site;
- All vegetation clearance will be minimised wherever possible as the first rule of the mitigation hierarchy (avoidance) and retained habitats protected (e.g. trees on site will be protected in line with BS5837:2012);
- Appropriate buffers from retained ecological features will be fenced or demarcated, including at least a 10m buffer from the retained field ditch and up to 15m from woodland edges around the site or as

[49] CIRIA (2018) CIRIA Available from: http://www.ciria.org [Last accessed October 2024]

advised by a tree protection plan, and three metres from hedgerows, to ensure no direct impact to ditches and woodland and to provide habitat connectivity around the site.

- Noise reducing methods such as acoustic buffers or hoods on generators will be implemented.
- Plant will be located as far as reasonably practicable away from sensitive ecological receptors such as watercourses or retained trees or hedges and will be shut down when not in use.

6.1.1.2 Ecological Clerks of Works (ECoW)

An Ecological Clerk of Works (ECoW) will be employed during construction phase of the development, this requirement will be within the CEMP. The ECoW will be employed to oversee management of ecological issues as they arise and educate around ecological issues at the site, and oversee specific avoidance and mitigation required for ecological features, as well as creation of any enhancement measures.

The ECoW will deliver Toolbox Talks prior to the commencement of construction works to all site personnel to inform them of important ecological features at the site including INNS, protected and notable species. An associated register of attendance will be signed and kept as a record; and a copy of the toolbox talk left at the site office for reference. The ECoW will supervise all vegetation clearance on site to safeguard ecological features from injury.

The ECoW will ensure that required pre-construction surveys and checks for protected species have been carried out in good time for the start of construction.

6.1.2 Operational phase

The following general measures will be included in the proposal to prevent adverse effects on the ecological receptors on site and in the local area:

- All lighting will be designed to avoid or minimise light spill onto adjacent retained habitats such as treelines, hedgerows and watercourses in order to create dark areas to avoid disturbing nocturnal species in line with bird-friendly development guidance[50]. The light spill from internal lights will also be considered and minimised;
- Design of the hotel to incorporate best-practice guidance[51] towards treatments of glass to mitigate and prevent bird collisions, such as the implementation of visual markers and installation of opaque, translucent or UV glass where reasonably practicable;
- Vegetation screening will be included within the landscaping plans in order to reduce disturbance to species in adjacent habitats;
- The inclusion of soft landscaping of all areas of the site that are not associated with the building or access roads to provide biodiversity function and enhancement to the area, such as species-rich grasslands and native fruiting shrubs species to provide a food source for invertebrates, birds and mammals, and native tree planting to maintain and enhance the tree, woodland and scrub diversity within the local area; and,
- The proposed uses SuDS and green infrastructure measures will sufficiently minimise the risk of contaminants leaving the site and ensure that water leaving the site by the piped system to the waterbodies will be of good quality. These new water features will also act as a "green corridor," connecting the site to adjacent retained habitats within the golf course.
- Further survey for otters is required to establish crossing points and then provision of safe crossing points to potentially include purpose-built otter culverts under the road with associated fencing and planting, with reduced lighting to maintain safe passage through the wider site to the golf course water bodies.

[50]Bird Friendly Development Guidelines (2017): Best Practices for Effective Lighting. Available from: Best Practices for Effective Lighting (toronto.ca) [Last accessed October 2024]

[51] Bird Friendly Development Guidelines (2017): Best Practices Glass. Available from: Bird-Friendly Best Practices Glass (toronto.ca) [Last accessed October]

6.2 Appropriate Assessment of the project with mitigation measures

Where adverse effects to the International Site integrity cannot be ruled out, mitigation must be provided. Proposed mitigation for each of the pathways is described below.

Table 4: Appropriate Assessment of the project alone with mitigation measures.

Potential Impact Pathway (as identified in Table 3)	Required mitigation measures	Can adverse effect on the International Site integrity be ruled out?	
		During construction	During operation
Water pollution, including sedimentation	The risk of leakage or spillage of fuel, chemicals and other potentially polluting substances including sedimentation would be mitigated through the general site best practice pollution prevention measures and management as detailed in Section 6.1, implemented via the CEMP for the site.	Yes	Yes
Spread of INNS and disease	An Invasive Species Management Plan will be produced as part of the CEMP as detailed in Section 6.1. A toolbox talk will be delivered so that all site members to be made aware of the presence of INNS. This will be delivered by a suitably experienced and competent ecologist to highlight the ecological features on site to all site staff. A list of all attendees will be signed and recorded with the site office as record of the talk. If site members suspect that further INNS may be present, they should immediately inform the supervisor no attempt should be made to remove or disturb any suspected INNS. Guidance on the control of INNS[52], must be followed if any INNS identified are likely to be affected by the construction. Assurance should be sought from external contractors that, where possible, machinery is not being brought onto site immediately from works on external waterbodies. Machinery should be dry and free of mud or debris from all previous sites. Biosecurity measures will be adhered to. In the event that any operative has used site footwear either within or along the banks of the ditch or near another watercourse external to the site, footwear should be scrubbed down and left to dry fully prior to reuse on site. If this is not possible then a disinfectant station should be installed. It is recommended that a disinfectant, such as Virkon S, is used which must be stored in a secure container when not in use.	Yes	Yes

[52] Natural England, Department for Environment, Food & Rural Affairs (Defra) and Environment Agency (2014) How to identify, control and dispose of plants that can harm livestock and the environment.

Potential Impact Pathway (as identified in Table 3)	Required mitigation measures	Can adverse effect on the International Site integrity be ruled out?	
		During construction	During operation
Physical disturbance of habitats used by SAC, SPA and Ramsar species	There will be a permanent loss of habitat at the site totalling 9165m^2, but due to the remaining retained habitat and the golf course being more widely used by species of associated with the SPA/Ramsar Sites, and replacement planting and habitat enhancement incorporated into the design as stated in Section 6.1.2, the impact due to habitat loss is considered to be minor and not leading to an adverse effect on site integrity. During construction and operation of the site, more activity is anticipated in terms of pedestrian and traffic movements compared to the existing use of the site. With best practice mitigation implemented to reduce noise from machinery and sensitive lighting both at construction and operation (including best practice glass design) it is considered that the remaining habitat retained within the wider site, proposed compensatory planting for screening and the adjacent golf course land offering enough habitat for the low numbers of wintering birds present, to forage or roost away from either noise or lighting disturbance and therefore any impacts are considered to be minor and not leading to an adverse effect on site integrity. The provision of tree planting around the hotel development will provide a buffer between the proposed development and Machynys Ponds SSSI, and thereby reducing any impacts to adjacent habitats/species from any potential noise and lighting. Furthermore, the incorporation of wetland habitat as part of the SuDs will also mitigate water pollutants entering the golf ponds, as well as provide increased nesting and foraging opportunities for a wide range of waterfowl present on the adjacent golf course, especially during the winter months. Prior to any work, further surveys for otter at the B3404, ditch network and scrub within the site will be carried out to determine activity and maintain safe commuting routes as well as identifying if any resting places that have become established and occupied by otters since survey undertaken in 2024 where none were identified in proximity to the site. To ensure provision of safe crossing points, the potential inclusion of purpose-built otter culverts under the road with associated fencing and planting, with reduced lighting will maintain safe passage through the wider site to the golf course water bodies during both construction and operation. To ensure no otters are harmed during construction, excavations are to be covered or a means of escape for any animal is installed into excavations. Additionally, any exposed pipe systems should be capped to prevent otter gaining access. No night working is anticipated during construction. If task lighting is required, it must be directed away from the watercourse and retained dense scrub habitat.	Yes	Yes
Harm, disturbance, or displacement to faunal species		Yes	Yes

6.3 Residual Effects

With the inclusion of the mitigation measures summarised in Table 4 it is concluded that the proposed development alone is unlikely to give rise to an adverse effect on the integrity of the Carmarthen Bay and Estuaries EMS (including the SAC, SPA and Ramsar site qualifying features).

6.4 In-combination effects

As detailed in Section 5.4 no projects that could act in combination have been identified. With the above mitigation measures described, combined with the lack of impact from these nearby projects, no in combination effects are anticipated.

7. Conclusions

Ove Arup and Partners Limited (Arup) has been appointed by CCC to submit information to inform a Habitats Regulations Assessment (HRA) in relation to an outline planning application of a proposed hotel development located at Machynys, Llanelli.

Eight International sites were identified within 10km of the proposed works comprising Burry Inlet Ramsar (located 0.3km southwest), Burry Inlet SPA (located 0.3km southwest), Carmarthen Bay SPA (located 0.3km southwest) and Carmarthen Bay and Estuaries SAC (located 0.3km southwest), collectively termed the Carmarthen Bay and Estuaries European Marine Site (EMS). The remaining four sites comprise Gower Commons SAC (located 5.3km south), Carmarthen Bay Dunes SAC (located 5.5km southwest), Gower Ash Woods SAC, (located 5.5km south) and Bristol Channel Approaches (located 8.8km west).

Several habitats of the Burry Inlet SPA/Ramsar, Carmarthen Bay and Estuary SAC, Carmarthen Bay Dunes SAC and Bristol Channel Approaches SAC and are loosely connected to the site via the existing drainage ditches and ponds present to the south of the site, which outfalls into River Loughour (Burry Inlet). However, upon assessment, it was considered that any pollutants and/or sedimentation events caused by construction and/or operation were likely to be significantly intercepted and/or diluted by the time it reaches the following sites: Carmarthen Bay Dune SAC, Bristol Channel Approaches SAC and Carmarthen Bay SPA, which are all located over 5km downstream of Burry Inlet. For that reason, these sites were scoped out at Stage 1. Gower Ash Wood SAC and Gower Commons SAC were also scoped out at Stage 1 due to lack of terrestrial and hydrological pathway present.

Burry Inlet SPA/Ramsar and Carmarthen Bay and Estuary SAC were all scoped in at Stage 1 due to their proximity to site, as well as the site and wider area offering suitable functionally linked habitat which supporting qualifying species to the SAC/SPA/Ramsar, such as wintering birds and otter.

A total of 40 species was recorded on-site during the wintering bird surveys. With the exception of herring gull, all records of waterbirds on-site comprised single birds seen on one occasion only. A range of waterbirds were recorded off-site, notably around the SSSI ponds to the south, primarily comprising low numbers of common species occurring irregularly across the survey period but included relatively regular records of shoveler a qualifying species of the Burry Inlet SPA - with a peak of 26 birds recorded. This count represents 11.3% of the Burry Inlet SPA population, based upon 5-year peak mean of five-year average peaks for the years 1985/86 to 1989/90 and therefore this habitat could be considered functionally linked to the Burry Inlet SPA.

Despite this habitat being off-site, waterfowl species utilising the adjacent habitats, such as Machynys Ponds SSSI could be subject to disturbance through increased noise, lighting and injury/mortality during construction and operational activities. Machynys Ponds SSSI is also hydrologically connected to the site through the existing drainage ditch and therefore the potential for the proposed works to result in a pollution incident e.g. oil/chemical pollution through spills during construction work could not be ruled out. Furthermore, permanent disturbance during the operational phase by lighting, noise, bird collision or the potential increase in public presence which could result in adverse impacts relating to foraging success and subsequently on reproduction.

With best practice mitigation implemented to reduce noise from machinery and sensitive lighting both at construction and operation (including best practice glass design) it is considered that the remaining habitat retained within the wider site, proposed compensatory planting for screening and the adjacent golf course land offering enough habitat for the low numbers of wintering birds present, to forage or roost away from either noise or lighting disturbance and therefore any adverse impacts are minor. In addition, the provision of tree planting around the hotel development will provide a buffer between the proposed development and Machynys Ponds SSSI, and thereby reducing any impacts to adjacent habitats/species from any potential noise and lighting. Furthermore, the incorporation of wetland habitat as part of the SuDs will also mitigate water pollutants entering the golf ponds, as well as provide increased nesting and foraging opportunities for a wide range of waterfowl present on the adjacent golf course, especially during the winter months.

Impacts to otters are not considered to result in an adverse effect on the integrity of the Carmarthen Bay and Estuary SAC with further survey and appropriate mitigation implemented. Impacts to otters during

construction will be mitigated through best practice measures such as pre-construction surveys by a suitably experienced ecologist, mammal ramps/covers on excavations, pollution control and sensitive working times/lighting. Pre- construction surveys will identify any crossing points from the B4304 through the site and mitigation such as fencing and retention of vegetation will maintain these commuting routes. Surveys will confirm the requirement for an otter underpass and sensitive lighting design to maintain safe passage from the north of the B4304 to the south of the site for otters during the operational phase of the scheme.

This report considers the potential effects on the Carmarthen Bay and Estuaries EMS in relation to the conservation objectives for the features of the International Site and identified potential pathways for effect. The Appropriate Assessment has considered these effects in relation to the Conservation Objectives for the features of the International Sites and has further identified suitable mitigation measures.

These mitigation measures are considered sufficient to ensure that the proposed works do not, either alone or in-combination with other plans or projects, give rise to any adverse effects on the integrity of the Carmarthen Bay and Estuaries EMS

This report is produced solely for the benefit of CCC and no liability is accepted for any reliance placed on it by any other party. This report is prepared for the proposed uses stated in the report and should not be used in a different context.

Figures

Figure 1: Site location and survey area
Figure 2: Internationally designated sites within 10km of the site boundary
Figure 3: Extended phase 1 habitat results

A3

22/10/2024 15:55

Survey area
Hotel outline application boundary
Hotel development area

Coordinate System: British National Grid

--

Metres
0 50 100

Rev	Date	By	Chkd	Appd	Authd
02	22/10/24	ET	CP	PC	--

ARUP

13 Fitzroy Street
London W1T 4BQ
Tel +44 20 7636 1531
www.arup.com

Client
Carmarthenshire County Council

Project Name
Machynys Hotel Outline Planning Application

Drawing Title
Site location and layout

Scale at A3
1:2,500

Role
Ecology

Suitability
For Information

Project Number	Rev
278688	02

Drawing Number
Figure 1

A3

16/10/2024 16:31

- Hotel outline application boundary
- 10km buffer
- Carmarthen Bay and Estuaries SAC
- Burry Inlet SPA
- Carmarthen Bay SPA
- Carmarthen Bay Dunes SAC
- Burry Inlet Ramsar
- Bristol Channel Approaches SPA
- Gower Ash Woods SAC
- Gower Commons SAC

Coordinate System: British National Grid

--

Metres

0 500 1,000 2,000 3,000 4,000

Rev	Date	By	Chkd	Appd	Authd
01	11/10/24	ET	CP	PC	--

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Client

Carmarthenshire County Council

Project Name

Machynys Hotel Outline Planning Application

Drawing Title

Internationally designated sites within 10km of the site boundary

Scale at A3

1:82,000

Role

Ecology

Suitability

For Information

Project Number

278688

Rev

01

Drawing Number

Figure 2

A3

16/10/2024 16:49

- Survey area
- Hotel outline application boundary
- TN - Target note
- A1.1.1 - Semi-natural broadleaved woodland
- A1.3.1 - Mixed woodland
- J2.6 - Dry ditch
- J2.1.2 - Intact hedge - species-poor
- A1.1.1 - Broadleaved woodland - semi-natural
- A1.3.1 - Mixed woodland - semi-natural
- A1.3.2 - Mixed woodland - plantation
- A2.1 - Scrub - dense/continuous
- A2.2 - Scrub - scattered
- A3.1 - Broadleaved parkland/scattered trees
- B2.2 - Neutral grassland - semi-improved
- B5 - Marsh/marshy grassland
- C3.1 - Other tall herb and fern - ruderal
- J1.2 - Cultivated/disturbed land - amenity grassland
- J1.4 - Introduced shrub
- J5 - Gravel/hard standing

Coordinate System: British National Grid

Metres

0 50 100

Rev	Date	By	Chkd	Appd	Authd
P01	16/10/2024	ET	CP	PC	--

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Client

Carmarthenshire County Council

Project Name

Machynys Hotel Outline Application

Drawing Title

Phase 1 Habitat Survey Results

Scale at A3

1:2,500

Role

Ecology

Suitability

For Information

Project Number

278688

Rev

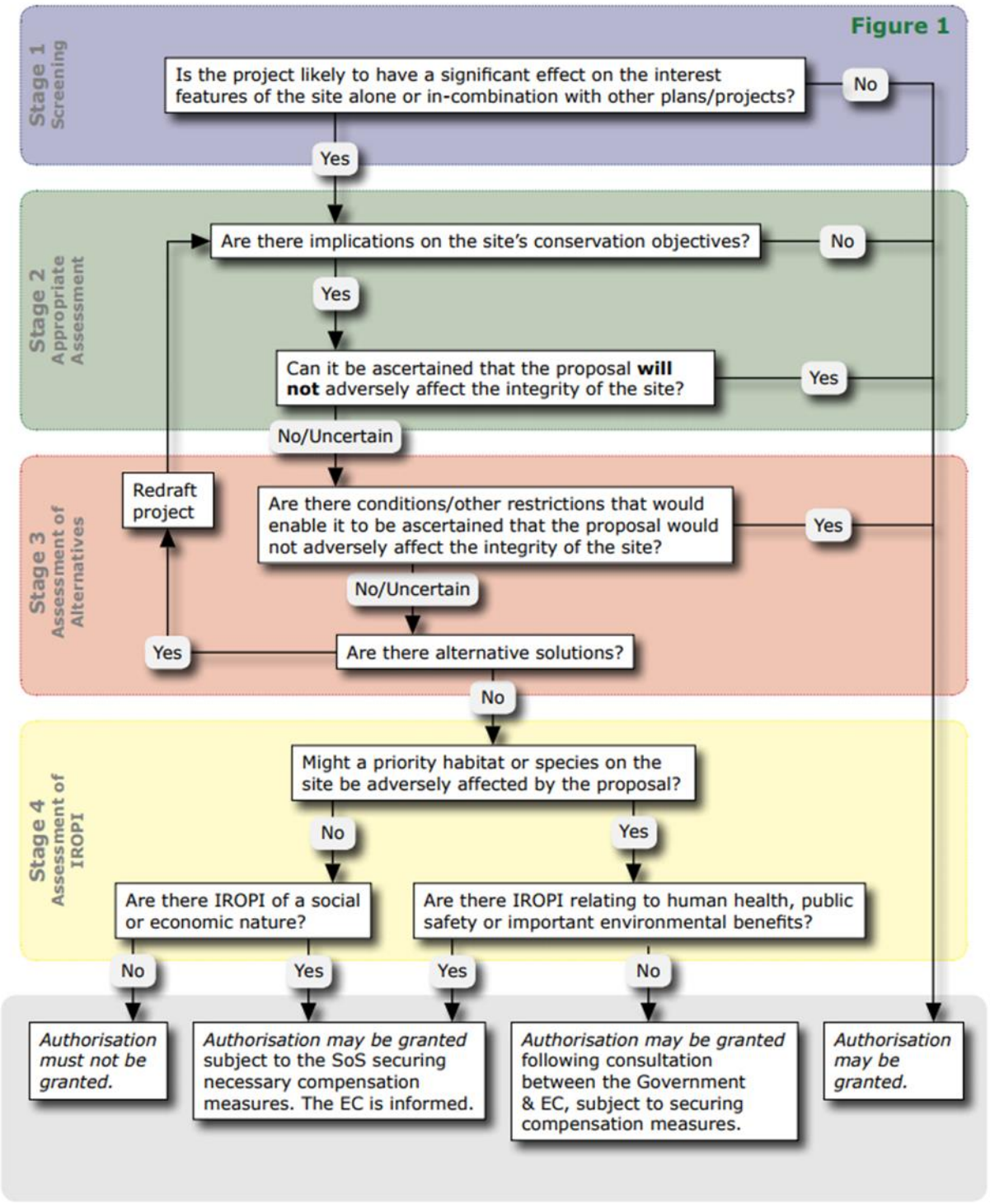
P01

Drawing Name

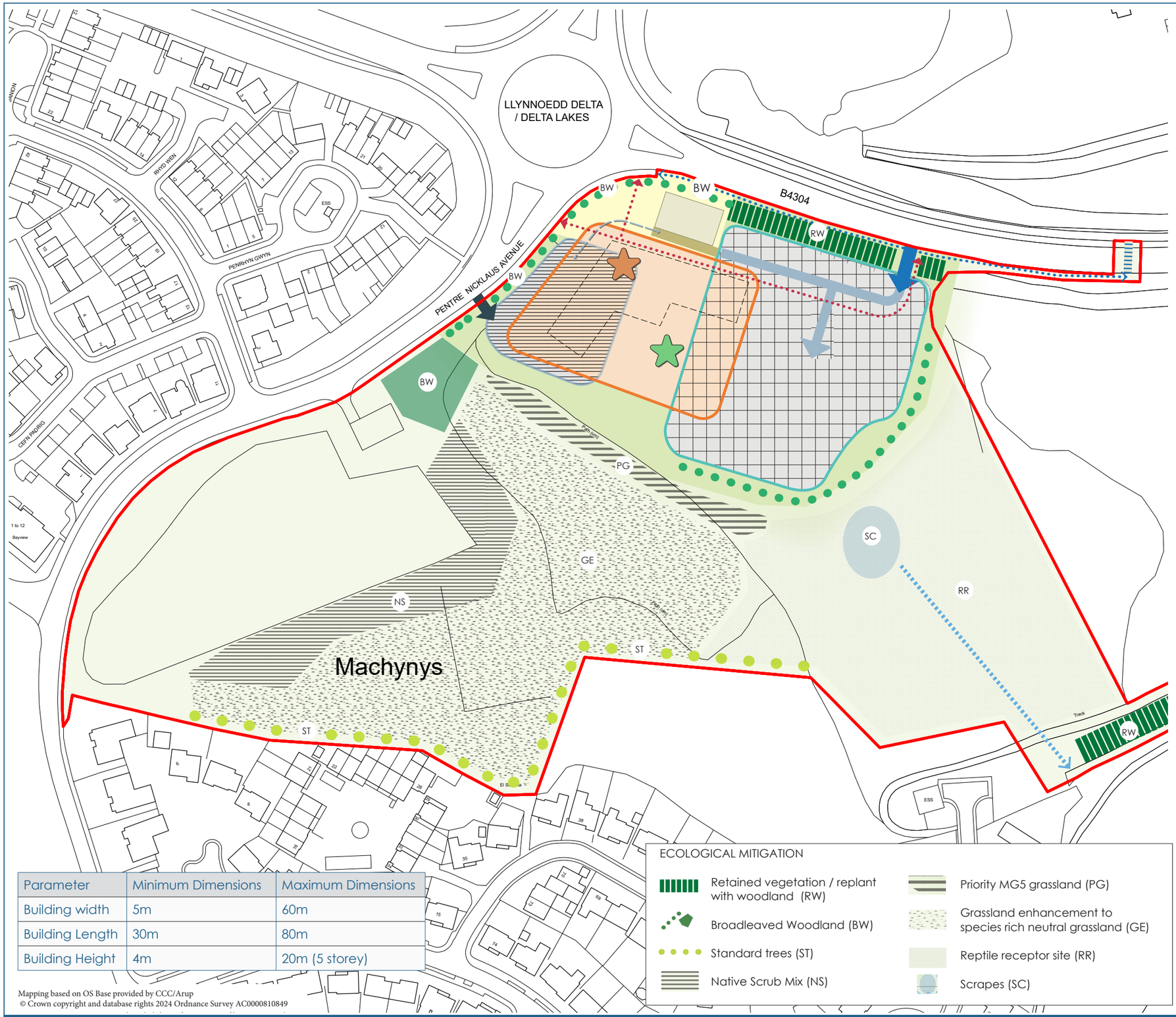
Figure 3

\\global\gis\UK\278000\278688\Workspaces\EcologyFigures.aprx

Appendix A – Habitat Regulations Assessment Process[7]



Appendix B - Illustrative Site Parameter Plan



DESIGN PRINCIPLES

Red Line Boundary

FLEXIBLE LAND USE AREAS

Indicative building area

Flexible zone for the main hotel structure(s). Refer to the table for maximum footprint, height, and massing principles.

Indicative building footprint (illustrative only).

Refer to the table for maximum footprint, height and massing principles.

Gateway arrival space

Primary pedestrian and cyclist access, designed as a high-quality public realm. Promotes active travel with shared space crossings and bicycle parking. Emergency/service vehicle access across space possible.

Main hotel entrance

Flexible location for the main entrance positioned at a key corner/gateway for prominence. Adaptable based on circulation and layout.

Hotel amenity zone

Southerly-facing leisure/event area within a landscaped setting, offering flexibility for guest amenities and aesthetic appeal.

Primary access point

Main access via B4304 for vehicles and pedestrians.

Potential servicing access point

Secondary access via Pentre Nicklaus Avenue for delivery/servicing vehicles only.

Potential extension to footpath

Potential new crossing

Indicative footpath

Indicative circulation route for vehicles.

Turning area

Drop-off area

Dedicated space for vehicle turning and drop-off, including coaches, taxis, and cars.

Access & parking area

Flexible area for access and parking, accommodating accessible parking and electric vehicle (EV) near building.

Servicing & delivery zones

Flexible zone for servicing, waste/ recycling, and delivery, overlapping with back-of-house operations.

Retained existing vegetation where possible / Replant with woodland

Retained existing landscape where possible & New Landscape planting

Flexible landscaping zones providing green buffers, overlapping with other development areas for enhanced aesthetics and environmental value.

Drawing notes

- *The drawing incorporates flexible, overlapping areas to allow for future adjustments in line with the detailed design, hotel operator requirements, and guest preferences.*
- *Hotel building to incorporate green roof and photovolatics (PV).*
- *Sustainable drainage systems (SUDs) such as rain gardens and swales to manage stormwater can be incorporated within all areas as required.*
- *Existing/proposed utility corridors to be accurately determined and routed through flexible zones if required, allowing for adjustments as the design evolves.*
- *Refer to flood constraints mapping for accurate flood line*

Parameter	Minimum Dimensions	Maximum Dimensions
Building width	5m	60m
Building Length	30m	80m
Building Height	4m	20m (5 storey)

ECOLOGICAL MITIGATION

- Retained vegetation / replant with woodland (RW)
- Broadleaved Woodland (BW)
- Standard trees (ST)
- Native Scrub Mix (NS)
- Priority MG5 grassland (PG)
- Grassland enhancement to species rich neutral grassland (GE)
- Reptile receptor site (RR)
- Scrapes (SC)

CLIENT	SCALE @ A3	DATE	DRAWN BY
Carmarthenshire County Council	1:1500	October '24	GB
JOB TITLE	JOB NO.	DRAWING NO.	REVISION
Machynys Hotel OPA	2475	MH_PP 01	-
DRAWING TITLE			
Parameter Plan			

REV.	DESCRIPTION	DATE
-	-	-

0 50m

Do not scale from this drawing

N

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www.hammond-ltd.co.uk

Appendix C – Planning Applications

Application Ref	Registration Date	Application Type	Status	Proposal	Address	Decision Sent Date	Ward	Parish
PL/07703	09/05/2024	Householder planning permission	Closed	Demolish existing rear porch extension and construct single storey flat roofed rear extension and raised balcony and new rooflight to rear elevation roof (Resubmission of PL/07166 Refused on 15/04/2024)	54 Gower View, Llanelli, SA15 3SW	10/06/2024	Lliedi	Llanelli
PL/07594	10/05/2024	Householder planning permission	Closed	Proposed two storey rear and side extension with a single storey rear extension	30 Chapman Street, Llanelli, SA15 3EB	17/06/2024	Elli	Llanelli
PL/07640	10/05/2024	Removal/Variation of a condition	In Review	Variation of Condition 2 on S/38175 (Detached Dwellinghouse)	Land adjacent to 11 Penygaer Road, Llanelli, SA14 8RU		Lliedi	Llanelli
PL/07690	17/05/2024	Householder planning permission	Closed	Alterations to roof	34A Murray Street, Llanelli, SA15 1DJ	28/06/2024	Tyisha	Llanelli
PL/07656	23/05/2024	Consent to display an advertisement	Closed	Advertisement consent for the change of use from Use Class A1 (shops) to Use Class A2 (financial and professional Services), installation of A	St Elli Centre, Llanelli, SA15 1SH	04/07/2024	Tyisha	Llanelli
PL/07655	23/05/2024	Full planning permission	Closed	Change of use from Use Class A1 (shops) to Use Class A2 (financial and professional Services) and installation of A	St Elli Centre, Llanelli, SA15 1SH	04/07/2024	Tyisha	Llanelli
PL/07766	28/05/2024	Full planning permission	Closed	Proposed internal alterations and change of use to retain existing dwelling and change use of former hot food takeaway to stone masons unit	31 Nathan Street, Llanelli, SA15 2PG	20/06/2024	Glanymor	Llanelli
PL/07807	04/06/2024	Approval of details reserved by a condition	In Review	Discharge of Condition 9 on PL/05866 (Contaminated Land/Mine Gas)	Cable Harnesses Uk, Trostre Industrial Park, Llanelli, SA14 9UU		Bigyn	Llanelli
PL/07627	04/06/2024	Full planning permission	Closed	To cover an existing balcony and terrace outdoor seated area with retractable roof, automatic glass front screens and glass sides, sliding doors	The Diplomat Hotel, Felinfoel Road, Llanelli, SA15 3PJ	23/07/2024	Lliedi	Llanelli

Application Ref	Registration Date	Application Type	Status	Proposal	Address	Decision Sent Date	Ward	Parish
PL/07751	06/06/2024	Full planning permission	Closed	Alterations to existing building to facilitate A3 winebar use including a 1st floor external balcony area and escape stairway	9 Hall Street, Llanelli, SA15 3BB	10/07/2024	Elli	Llanelli
PL/07949	02/07/2024	Listed building consent	Closed	The careful replacement and repair of defective elements of the ceiling and wall plasterwork and windows to the south elevation of the chambers at Llanelli Town Hall	Carmarthenshire County Council Town Hall, Church Street, Llanelli, SA15 3AH	27/08/2024	Tyisha	Llanelli
PL/07960	17/07/2024	Householder planning permission	Closed	Proposed rear and side extension to property	217 Felinfoel Road, Llanelli, SA15 3NZ	09/08/2024	Lliedi	Llanelli
PL/08039	23/07/2024	Approval of details reserved by a condition	In Review	Discharge of Condition 5 on PL/07019 (Proposed Location and Site Plan, Proposed Site Plan and Details, Preliminary Risk Assessment and Ground Investigation Interpretative Report)	Penyfan Park, Off Firth Road, Llanelli, SA15 1PW		Bigyn	Llanelli
PL/08014	23/07/2024	Householder planning permission	Closed	Single storey rear extension and internal works	14 Miles Street, Llanelli, SA15 3DU	18/09/2024	Elli	Llanelli
PL/08075	29/07/2024	Approval of details reserved by a condition	Closed	Partial Discharge of Condition 5 (Part 3) on PL/04829 (Gas Protection Verification Plan)	Trostre Steelworks, Maes Ar Ddafen Road, Llanelli, SA14 9SD	11/09/2024	Bigyn	Llanelli
PL/08081	29/07/2024	Full planning permission	Closed	Turning of an old ground floor office into a small cafe (Retrospective)	Mike Clarke Printing, 9 Trostre Industrial Park, Llanelli, SA14 9UU	04/10/2024	Bigyn	Llanelli
PL/08100	31/07/2024	Consent to display an advertisement	Closed	1 x New skin to fit existing box and 1 x Window Vinyl	3B Parc Trostre Retail Park, Llanelli, SA14 9UY	26/09/2024	Bigyn	Llanelli
PL/08090	01/08/2024	Approval of details reserved by a condition	Closed	Discharge of Condition 4 on PL/07212 (Construction)	4A Vaughan Street, Llanelli, SA15 3TY	17/09/2024	Tyisha	Llanelli

Application Ref	Registration Date	Application Type	Status	Proposal	Address	Decision Sent Date	Ward	Parish
PL/08111	05/08/2024	Approval of details reserved by a condition	Closed	Partial Discharge of Condition 19 on S/36948 (Soil Importation)	Llanelli Wellness And Life Science Village Zone 1, Pentre Awel, Llanelli, SA15 2EZ	03/10/2024	Glanymor	Llanelli
PL/08011	05/08/2024	Listed building consent	Closed	Replacement of concrete roof tiles with Zamora Prime Spanish Slate	13 Old Road, Llanelli, SA15 3HR	20/09/2024	Elli	Llanelli
PL/08115	09/08/2024	Non-Material Amendment	Under Consultation	Non-Material Amendment to PL/00194 (Amended plans)	2, 4, 4A, 6 & 8 Stepney Street, Llanelli, SA15 3UP		Elli	Llanelli
PL/08092	15/08/2024	Full planning permission	Closed	The proposed development is for the retrofit of 32 dwellings - external wall insulation with new brick slip finish, new entrance canopies to main entrance doors, roof mounted solar PV panels and battery storage, and improvements to landscaping and external	No. 8 - 70 Sunny Hill, Llanelli, SA15 3JN	26/09/2024	Lliedi	Llanelli
PL/08141	22/08/2024	Consent to display an advertisement	In Review	Retention of advertisement sign on boundary fence	New Dock Stars Rugby Football Club, Trostre Road, Llanelli, SA15 1JY		Bigyn	Llanelli
PL/08209	03/09/2024	Approval of details reserved by a condition	Closed	Discharge of Condition 5 on PL/06739 (Delivery and Servicing Management Plan)	19 St Elli Centre, Llanelli, SA15 1SH	03/10/2024	Tyisha	Llanelli
PL/08190	03/09/2024	Full planning permission	In Review	Change of use from a C3 dwelling house to a C4 house in multiple occupancy (hmo) (4 bedrooms and 2 bathrooms)	3 New Road, Llanelli, SA15 3DP		Elli	Llanelli
PL/08199	09/09/2024	Full planning permission	Registered	Alterations and extension of existing building to facilitate its proposed use as an wine bar (A3 use), including a 1st floor external balcony area and escape stairway (Retrospective)	First Floor Flat, 9 Hall Street, Llanelli, SA15 3BB		Elli	Llanelli
PL/08074	17/09/2024	Householder planning permission	In Review	Proposed single storey side and rear extension	73 Corporation Avenue, Llanelli, SA15 3NH		Lliedi	Llanelli

Application Ref	Registration Date	Application Type	Status	Proposal	Address	Decision Sent Date	Ward	Parish
PL/08263	23/09/2024	Full planning permission	Under Consultation	Proposed 4 domestic storage units	Land at rear of Park View Terrace, Llanelli, SA15 3HA		Elli	Llanelli
PL/08279	24/09/2024	Consent to display an advertisement	In Review	1 x high level, shaped fascia sign, 2 x fascia sign above shop front and entrance doors, 2 x hanging signs (new signage to existing sign boxes)	6F Parc Trostre Retail Park, Llanelli, SA14 9UY		Bigyn	Llanelli
PL/08303	01/10/2024	Full planning permission	Under Consultation	The proposal is to change the ground floor from A1 use to a mixed A1 and A3 use. Also to change the first floor to D2 use, including all associated internal and external upgrade works	17 Stepney Street, Llanelli, SA15 3YB		Tyisha	Llanelli