

Carmarthenshire County Council

Machynys Hotel Outline Planning Application

Pre-Application Consultation Summary Document

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Job number 278688

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1. Introduction

1.1 Pre-application Consultation

Ove Arup and Partners Ltd. (Arup) has been commissioned by Carmarthenshire County Council (CCC) as Applicant to prepare this Pre-Application Consultation (PAC) Summary Document in relation to an outline application, with all matters reserved, for the proposed development of a 120-bed hotel to the east of Pentre Nicklaus Avenue, Llanelli, Carmarthenshire. This document summarises the key information in support of the PAC.

The application will be submitted to CCC as the Local Planning Authority (LPA), on behalf of the Applicant, CCC as landowner. The proposed development is described as follows:

“Outline planning application for the proposed development of a hotel and associated landscaping, drainage and other supporting infrastructure, with all matters reserved.”

The application site exceeds 1 hectare and therefore constitutes ‘major development’ as defined within The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (as amended), herein referred to as ‘the Order’. The application has therefore been scoped to accord with the regulations associated with major development.

1.2 The Proposed Development

The proposal comprises the construction of a hotel of up to five-stories, 120-beds, and with a maximum building width of 60m, length of 80m and height of 20m. The proposal incorporates associated infrastructure and landscaping, including the construction of a car park benefitting from up to 140no. parking spaces in total, and the provision of ecological and landscape mitigation and drainage features around the hotel’s perimeter, designed to provide a net benefit in biodiversity and mitigate flood risk.

The illustrative masterplan can be seen in Appendix A.1.

The site is described as previously developed land in various supporting technical documents due to its historic development and clearance over the past few decades, and the technical nature of the supporting reports. However, from a planning policy perspective, parts of the site may now be considered to fall within the exclusion criteria within the definition of previously developed land in PPW12, which includes “land where the remains of any structure or activity have blended into the landscape over time so that they can reasonably be considered part of the natural surroundings”.

1.2.1 Design and Character

The hotel’s detailed design and external appearance would be agreed through a subsequent Reserved Matters (RM) application, if outline permission is granted. Notwithstanding this, its outline design has incorporated the following principles:

- Positioned within the north-western corner of the site to provide a focal point and an active frontage for surrounding users, supporting accessibility from multiple directions.
- A maximum height parameter of 20m as shown on the Parameter Plan (drawing no. MH_PP 01) to ensure the development is in-keeping with its surroundings including the adjacent Pentre Awel development which also has a maximum height of 20m.
- Up to 50% green roof and up to 50% solar PV, providing a low energy and sustainable design.
- Maximised views from the hotel across the golf course and Burry Inlet to the south, providing a connection to nature for guests.
- Clear access and wayfinding for visitors, providing connectivity to the main road network, Millenium Coastal Path and other public transport and active travel routes.
- Sufficient land surrounding the hotel to provide necessary mitigation and enhancement to achieve a biodiversity net benefit at the site.

1.2.2 Vehicular Access and Servicing

The proposal includes the construction of a new primary vehicular access point into the north of the application site from the B4304, which is located east of the roundabout connecting the B4304 to Pentre Nicklaus Avenue. The proposed access would comprise a simple T-junction with adequate visibility splays and associated pedestrian connectivity to allow pedestrians to access surrounding facilities by foot.

An additional vehicular access onto the western section of the site is proposed for service vehicles only, from Pentre Nicklaus Avenue, to provide access to a dedicated service area to the rear of the hotel as indicated by the 'servicing & delivery zone' shown on the Illustrative Masterplan (drawing no. MH_IMP 01). This proposed access would also comprise a simple T-junction with adequate visibility splays for service vehicles. This separate access point would allow servicing activities and deliveries to be undertaken away from the hotel's main entrance and frontage, limiting disruption to visitors and users of the B4304.

1.2.3 Car Parking

The proposed car park includes parking spaces for up to 140no. vehicles. The proposed parking provision includes up to 120no. visitor spaces (including 12no. disabled spaces and 10no. Electric Vehicle spaces) and 20no. staff spaces. Although all matters are reserved within this outline application, the indicative plans submitted set out how the proposed car parking area could be laid out.

1.2.4 Green Infrastructure and Landscaping

The proposal includes a significant amount of Green Infrastructure, including up to 1,421sqm for Sustainable Drainage Systems (SuDS) and up to 543sqm for the proposed green roof.

Embedded mitigation, as set out below, includes measures that have been incorporated within the design to avoid or reduce the impacts of habitat loss, habitat fragmentation, habitat degradation, and species disturbance and mortality, thus avoiding or reducing significant adverse environmental effects.

- The design retains as much of the existing tree bank on the northern edge of the site as possible, limiting loss to that required for access roads into the site and a turning circle within the site.
- The hotel's proposed siting avoids flood risk and avoids the largest area of woodland towards the east of the site.
- The design avoids priority habitat MG5 grassland identified on the NVC survey in the centre of the overall site, for which there is potential to enhance.
- SuDS features are proposed to include the following: green roof, rain gardens and permeable surfacing. These, along with the proposed landscape features, would provide attenuation during rain events and serve as water treatment. This would improve the quality of the discharged surface water from the proposed hotel site to adjacent watercourses.

Green roofs are proposed to mitigate the loss of Open Mosaic Habitat (OMH). The green roofs would provide improved quality of water discharge and would provide habitat with good floral diversity to benefit a number of ecological features including invertebrates, birds and bats.

Documents and Drawings

Further details of the proposals are included within the following documents and drawings submitted in support of the outline planning application.

Documents

- Planning, Design and Access Statement
- Ecological Impact Assessment
- Habitats Regulations Assessment
- Green Infrastructure Statement
- Flood Consequences Assessment

- Utilities and Drainage Strategy
- Transport Assessment (including Framework Travel Plan and Construction Traffic Management)
- Geotechnical and Geoenvironmental Desk Study
- Outline Construction Environment Management Plan
- Water Framework Directive Assessment
- Archaeological Desk Based Assessment and Field Evaluation
- Noise and Vibration Impact Assessment
- Tree Report

Drawings

- Site Location Plan
- Illustrative Masterplan
- Illustrative Development Framework Plan
- Parameter Plan
- Key Constraints and Opportunities Plan
- Proposed Indicative Layout
- Proposed Indicative Ground Floor Plan
- Proposed Indicative Upper Floor Plans
- Tree Constraints Plan

1.3 The Application Site

The application site, measuring circa 5.55ha, is located approximately 1.5 miles to the south-east of Llanelli town centre and overlooks the Burry Inlet and the Millennium Coastal Path to the south and west. The proposed development area covers part of the site occupied by the former Machynys brickworks in the early part of the 20th Century, and is in the southern area of Llanelli, which historically formed part of the docks.

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 site is currently vacant and benefits from public access linking Pentre Nicklaus Avenue to the Millennium Coastal Path. The site also benefits from good transport links with bus stops on the B4304. Llanelli Train Station is approximately 1 mile north of the application site, with pedestrian links available along the B4304.

The site is partially located within Flood Zone C1 and Flood Zone A in accordance with NRW's Development Advice Map, and Flood Zone 2 and 3 (Rivers and Sea) and the Llanelli_1 TAN15 Defended Zone in accordance with NRW's new Flood Map for Planning (yet to be implemented).

In accordance with the CCC's Adopted Local Development Plan (LDP) 2006- 2021, the site is allocated or located within the following planning designations:

- Policy EMP5 (Mixed Use Site) (GA2/MU3)
- Policy SP4 (Strategic Sites)
- Policy GP2 (Development Limits)

The site is identified as GA2/MU3 on the Proposals Map, where LDP Policy EMP5 allocates the application site for mixed-uses, permitting various types of development, including commercial leisure, essential ecological and amenity spaces, and potential surface water mitigation areas. This allocation lends itself to the proposed use as a hotel and associated infrastructure. The Proposals Map also identifies the site within the adopted Development Limits under Policy GP2, which defines the Development Limits as those settlements identified as Growth Areas, Service Centres, Local Service Centres and identified Sustainable Communities within the settlement framework.

Within the Deposit Revised LDP, the application site is no longer allocated for a particular land use but is directly adjacent to the settlement boundary surrounding the residential developments along Pentre Nicklaus Avenue, an Existing Employment area as well as the Pentre Awel Strategic Site. This Strategic Site aims to contribute to the overall provision for growth during the Plan Period through providing facilities and services to enhance well-being, integrate various sectors, and deliver significant social and economic benefits.

Notwithstanding this, as noted by the LPA, until the Revised LDP is adopted, the existing 2006-2021 LDP will remain in place for all planning decisions.

1.4 Purpose of this Report

This PAC Summary Document provides a summary of the PAC activities being undertaken for the proposed development and helps demonstrate that the consultation requirements prescribed by the Order will be met. The PAC is being held between 28 October 2024 and 25 November 2024. Full details of the pre-application activities undertaken will be presented within the supporting PAC Report which will be submitted as part of the outline planning application in due course (following the conclusion of the PAC process).

2. Approach to Consultation

2.1 The Approach

The approach to consultation is based on best practice and national and local consultation guidance, in particular the Welsh Government's Planning Major Developments: Guidance on Pre-Application Consultation (December 2021).

2.2 Pre-application Consultation Legislation, Policy and Guidance

2.2.1 Legislation

As noted within the introduction, this proposed development is subject to the requirements of the Order to undertake a prescribed set of publicity/consultation procedures prior to submitting an application for planning permission. In the context of the proposed development, the Order sets out that the developer should carry out the following:

- Display a Schedule 1B Site Notice in at least one place on or near to the land to which the proposed application relates for a period of no less than 28 days prior to submission;
- Identify a publicly accessible location near the site where the draft application information can be accessed electronically by consultees;
- Notify owners or occupiers of any land adjoining the land to which the proposed application relates using Schedule 1B notice, allowing 28 days for a response prior to submission;
- Notify community consultees using Schedule 1B notice, allowing 28 days for a response prior to submission;
- Make the draft planning application available publicly, via website, for 28 days prior to submission; and
- Notify specialist consultees using Schedule 1C notice and provide link to draft planning application, allowing 28 days for a response prior to submission.

The way in which the Applicant will meet the above legislative requirements throughout the PAC process has been described in Chapter 3 onwards of this report.

2.2.2 National Guidance

Article 1 of the Order sets out the requirements for PAC for major applications in Wales. The accompanying Advice Note for Developers outlines that “the requirement to undertake pre-application consultation applies to all planning applications for ‘major development’ (full or outline).”

The outline application, with all matters reserved, for the proposed hotel would constitute ‘major development’ by virtue of the fact that the development would be carried out on a site exceeding an area of 1 hectare. As such, the requirements of the Order have been applied to the project.

The Order requires Applicants for major planning applications to undertake PAC with both local communities and specialist consultees and requires the production of a PAC Report documenting the activities adopted.

In addition to the requirements for pre-application consultation outlined in the Order, Planning Policy Wales (edition 12) (PPW12) also provides consultation policy guidance. Throughout the chapters of PPW12, early engagement and consultation with the communities and stakeholders is encouraged, as well as collaborative work between local authorities, developers, stakeholders, and the local community.

Technical Advice Note (TAN) 12: Design further supports the Welsh Government's aspirations for public consultation. Paragraph 3.4 states that “particular attention should be focused on engaging end users and stakeholders in the design process from the outset and throughout the entire process, as a means of fostering a sense of ownership and consensus, which will be important to the long-term success of a project.”

3. Identifying Consultees

The requirements of the Order were used to identify relevant stakeholders and ensure a compliant PAC process.

3.1 Consultees

In accordance with the Order and its supporting guidance, statutory pre-application consultation must include engagement with the following consultees:

- Adjoining landowner/occupiers with a common land boundary with the site;
- Community consultees including Electoral Ward Councillors and the Community Council for the area within which the proposed development would be located; and
- Specialist consultees in the form of those organisations or bodies who should be consulted depending on the nature of the development as set out by Schedule 4 of the Order.

3.2 Identifying Consultees

An important step in the PAC process is identifying the key stakeholders. This process should be aligned with the requirements of the Order and should include the consultees stipulated in Section 3.1 above.

Methods adopted to identify the relevant consultees included the following:

- Review of land registry and postcode data to identify adjoining landowners/occupiers;
- Cross reference the description of development with Schedule 4 of the Order to identify specialist consultees; and
- Review of local authority website data and OS election maps to identify community consultees.

3.3 Statutory and Non-Statutory Consultees

The table below includes a full list of the individuals and organisations to be consulted during the PAC period. These consultees represent the full list of statutory consultees required to comply with the requirements of the Order, as well as a number of non-statutory consultees who are likely to have an interest in the proposed development.

Table 1: Statutory and Non-Statutory Consultees

Category	Consultees
Owners and Occupiers	<ul style="list-style-type: none">• Carmarthenshire County Council (landowner)• Adjoining landowners / occupiers with a common land boundary with the site.
Specialist Consultees	<ul style="list-style-type: none">• Natural Resources Wales• Dwr Cymru Welsh Water• Local Highways Authority• The Coal Authority• Fire & Rescue Service
Community Consultees	<ul style="list-style-type: none">• MP Dame Nia Griffith (MP representing Llanelli)• MS Lee Waters (Senedd Constituency Member)• Cllr Sean Rees (Glanymor Ward)• Cllr Louvain Roberts (Glanymor Ward)

Category	Consultees
	<ul style="list-style-type: none"> • Cllr Suzy Curry (Tyisha Ward) • Cllr Terry Davies (Tyisha Ward) • Cllr Michael Cranham (Bigyn Ward) • Cllr Philip Warlow (Bigyn Ward) • Cllr Janet Williams (Bigyn Ward) • Cllr Martyn Palfreman (Hengoed Ward) • Cllr Edward Skinner (Hengoed Ward) • Cllr Sharen Davies (Llwynhendy Ward) • Cllr Jason Hart (Llwynhendy Ward)
Non-Statutory Consultees	<ul style="list-style-type: none"> • CCC Public Health • CCC Ecologist • CCC Planning Case Officer

3.4 Consultation Methods

3.4.1 Pre application Engagement

Pre-application engagement was undertaken with Paul Richards – CCC planning case officer – in September 2024 to discuss the current proposal and obtain feedback prior to the commencement of the statutory PAC process, in accordance with the Town and Country Planning (Development Management Procedure) (Wales) Order (herein referred to as ‘the Order’) 2012 (as amended).

A summary of the feedback obtained during the meeting is provided below.

- With regards to the policy position, the development is acceptable in principle due to the site’s mixed-use allocation in the adopted LDP. The site also benefits from historic planning consents for hotel use on the adjacent site.
- The suggested list of supporting information is acceptable. The Transport Assessment will need to consider the cumulative impact of both this application and the approved Pentre Awel development.
- The outline application drawings should include a scheme of parameters (minimum and maximum) and an illustrative masterplan.

3.4.2 Details of Pre-application Process

PAC is being held between 28 October 2024 and 25 November 2024. The consultation will be advertised via a letter drop to neighbouring properties, on the <https://www.llanelli-waterside.wales/development-opportunities/machynys-hotel/> website and by display of a site notice. Feedback is welcomed by email to llanelliwaterside@carmarthenshire.gov.uk or in writing to County Hall, Castle Hill, Carmarthen SA31 1JP.

The aim of the consultation is to give the local community and other stakeholders an opportunity to understand and inform the proposals, prior to the submission of an outline planning application to the LPA.

Full details of the consultation activities will be presented within the supporting PAC Report, which will be submitted as part of the outline planning application following the conclusion of the PAC process.

4. Assessment and Design Response

This section provides a planning assessment of the key policy considerations for the proposed development against the LDP, guidance and other material considerations in the determination of the planning application.

4.1 Principle of Development

As outlined in chapter 4, in accordance with Future Wales (The National Plan 2040), the site is located within the Swansea Bay and Llanelli Growth Area. Future Wales Policy 28 notes that Swansea Bay and Llanelli will be the main focus for growth and investment in the South West region, and LDPs should recognise the area as the focus for strategic economic growth.

A clear strategy for the adopted LDP is to encourage growth within Llanelli. LDP Policy SP3 (Sustainable Distribution – Settlement Framework) reinforces this by including Llanelli within the identified Growth Areas. The application site is specifically allocated for mixed-use development under LDP Policies SP4 (Strategic Sites) and EMP5 (Mixed Use Sites), with specific reference to commercial leisure uses. The policies note that provision is made for mixed-use development (including commercial leisure and vital ecological/amenity space and potential mitigation for surface water) within the South Llanelli Strategic Zone (Site 3), under site reference GA2/MU3. The proposed use of the site as a hotel would therefore align with the LDP's aspiration for commercial leisure on the site, and the proposed use has already been established through the previous consent for a hotel on the site (planning application ref. S/22567).

Furthermore, LDP Policy SP15 (Tourism and Visitor Economy) supports tourism related development, citing growth areas as supportive locations, and LDP Policy TMS4 (Visitor Accommodation) states that proposals will be permitted within the development limits where they accord with LDP Policy SP15. There are also various complementary LDP allocations within proximity of the site which would benefit from the provision of a new hotel nearby. For example, the site is located to the south of an existing employment allocation (LDP Policy SP7, reference: GA2/MU9) known as Delta Lakes. It is therefore considered that the proposed development fully accords with the adopted LDP due to the site's mixed-use allocation, its location within the Development Limits, and the proposal's contribution towards Carmarthenshire's tourism offer.

Draft Policy SP11 (The Visitor Economy) within the Draft Revised LDP also lends support to the proposed development, with the policy supporting development with high quality design and placemaking principles that contributes to the protection and enhancement of the natural environment, adds value to the visitor economy, and is sustainable and appropriately located. As noted within the draft policy's supporting text, the tourism offer in Carmarthenshire ranges from natural features such as rights of way / walking to well-established renowned national attractions, with the County's outstanding natural environment appealing to the wellness tourism sector.

Whilst it is acknowledged that the Revised LDP would remove the existing LDP allocation, it also acknowledges that some tourism developments, by their very nature, must be located in the countryside or at coastal locations. It notes the importance of ensuring development coming forward in the countryside does not have any significant negative impact on the landscape, natural environment or amenity. Draft Revised LDP Policy VE2 (Holiday Accommodation) further notes that proposals for a high-quality serviced accommodation will be permitted where they are located within, or directly related to a defined settlement (as outlined in Draft Policy SP3 (Sustainable Distribution – Settlement Framework)). It is considered that the application site is directly related to a defined settlement due to its location between Pentre Nicklaus Village to the south, Bwlch y Gwynt to the west, and Pentre Awel to the north which are all located within the defined settlement of Llanelli, which is at the top of the settlement framework (identified within Tier 1 – Principal Centre).

The draft Revised LDP also identifies the Llanelli Wellness & Life Science Village Strategic Site directly north of the application site (site reference: PrC2/SSI, Draft Strategic Policy SP6), as well as the Delta Lakes Existing Employment Area (Draft Policy EME1). The proposed development would provide a hotel that would bring benefits to local tourism by providing new, and high-quality accommodation for visitors to explore Carmarthenshire and surrounding areas. The proposed development would also support business development in the area and support the proposed well-being and life sciences incubators within the Life Science and Wellness Village at Pentre Awel, contributing towards to the area's strategic economic growth.

It is therefore considered that the principle of development within the application site is compliant with local and national policy, is established by the adjacent historic consent, and would deliver the site's allocation for mixed-use development in line with the Adopted LDP.

4.2 Natural Environment

Future Wales (The National Plan 2040) emphasises that the need to reverse biodiversity decline and assist nature recovery is of 'imperative importance', with Policy 9: 'Resilient Ecological Networks and Green Infrastructure' requiring development proposals to demonstrate the resilience of ecosystems and green infrastructure assets through innovative, nature-based approaches.

PPW12 requires all planning applications to demonstrate the 'stepwise approach' (meaning any adverse environmental effects must firstly be avoided, then minimised, mitigated, and as a last resort compensated for) and compliance with biodiversity net benefit and ecosystem resilience. There is an emphasis on avoidance of development within statutory designated sites, or those not within but likely to damage, as a matter of principle. PPW12 notes that integrating green infrastructure into the design process of development is not limited to focusing on landscape and ecology, rather, consideration should be given to all features of the natural environment.

At a local level, Policy SP1 (Sustainable Places and Spaces) of the adopted LDP supports development which reflects sustainable development and design principles by, for example, protecting and enhancing the area's biodiversity value and where appropriate, seek to integrate nature conservation into new development. Furthermore, Policy SP14 (Protection and Enhancement of the Natural Environment) of the adopted LDP states that development should reflect the need to protect, and wherever possible enhance the County's natural environment.

Similarly, Draft Policy SP14 (Maintaining and Enhancing the Natural Environment) in the Draft Revised LDP emphasises that development must protect and enhance the natural environment through approaches including avoiding any significant loss of habitats or populations of species (locally and/or nationally) and providing net benefits for biodiversity.

Draft Policy PSD3 (Green and Blue Infrastructure Network) in the Draft Revised LDP notes that development proposals shall demonstrate effective Green and Blue Infrastructure (GBI) design solutions which, for example, maximise retention, protection, and integration of existing GBI assets and prioritise those of highest value, quality, and condition within and on the development site boundaries. As noted within the draft policy, planning applications will be required to submit surveys and assessments appropriate to the site and development, and submit a Green Infrastructure Statement to demonstrate how GBI design solutions have been considered and accommodated within the proposed development.

The Nature Conservation and Biodiversity SPG states that a Habitat Regulations Assessment (HRA) may be required to determine whether a project is likely to have a significant effect on a European site. In the case that the proposals are considered likely to have a significant effect, then an Appropriate Assessment may be required.

Due to the site's location within the settlement boundary and the mixed-use allocation, it is not subject to the level of environmental constraints and protections afforded to the countryside or areas of international and national nature conservation. Whilst the site is allocated for mixed-use development in the adopted LDP, it has not yet been developed and therefore remains greenfield land. As outlined in the Ecological Impact Assessment (EcIA) submitted in support of this application, the proposed development would result in the loss of approximately 9,165sqm of terrestrial semi-natural habitats on site including woodland and trees, dense and scattered scrub, and neutral grassland mosaic habitat (including a small amount of OMH priority habitat). The hotel footprint and associated hardstanding constitute 7,744sqm of this total area and can be considered a permanent loss of habitat. To mitigate this loss across the site, 6,100sqm of landscaping is proposed within the hotel development boundary, and a further 40,300sqm of mitigation and enhancement is proposed across the wider site.

To provide this net benefit in biodiversity, the proposals include a mix of broadleaved woodland, native scrub mix, priority MG5 grassland, grassland enhancement to species rich neutral grassland, and trees, as is shown on the submitted Illustrative Masterplan (drawing no. MH_IMP 01). In addition, the proposals include a SuDS area and a proposed green roof.

It is therefore considered that the ecological impact of development, which would facilitate the delivery of the mixed-use allocation and support the local tourism economy, has been carefully assessed, avoided, mitigated or compensated and enhanced in line with the aspirations set out in PPW12, Future Wales, the adopted LDP and the draft Revised LDP.

For full details of the embedded biodiversity design, as well as information on the baseline environment, evaluation of ecological features, potential construction and operational impacts, assumed construction practices and licence requirements, assessment of effects, further mitigation for Net Benefit for Biodiversity, residual effects, and monitoring and management, please refer to the EcIA and Green Infrastructure Statement submitted in support of the planning application. The locations of the habitats created, reinstated and enhanced are discussed within the EcIA.

A HRA Screening of the development has also been undertaken to ensure the proposed development does not unacceptably harm any international, national and local environmental designations. The HRA Screening Report has been submitted in support of this planning application.

4.3 Landscape and Visual Impact

PPW12 emphasises the importance of considering landscape and green infrastructure during the design process. PPW12 also notes that integrating green infrastructure is not limited to focusing on landscape and ecology, rather, consideration should be given to all features of the natural environment and how these function together to contribute towards the quality of places. PPW12 emphasises that good design does not just relate to the architecture of a building, but also the relationship between all elements of the natural and built environment (paragraph 3.3).

At a local level, Policy GP1 (Sustainability and High Quality Design) within the adopted LDP notes that development proposals will be permitted where they accord with measures including incorporating existing landscape or other features, and taking account of site contours and changes in levels. Policy SP14 (Protection and Enhancement of the Natural Environment) outlines that development should promote high quality design and contribute to local distinctiveness and enhance the landscape setting. The South Llanelli Planning and Development Brief SPG (2014) also underlines the importance of proposals sensitively integrating with the surrounding coastal and urban landscape, and that consideration will be given to the visual effect of proposals. The Adopted Placemaking & Design SPG (2016) reiterates this by setting out the importance of responding to the landscape character. LDP Policy EQ6 (Special Landscape Areas) also states that proposals which enhance or improve Special Landscape Areas, such as Carmarthen Bay and Estuaries, will be supported.

Draft Policy BHE2 (Landscape Character) of the Draft Revised LDP notes that development proposals should relate to the specific landscape and visual characteristics of the local area, ensuring that the overall integrity of landscape character is maintained by, for example, respecting and conserving specific landscape features, and integrating the principles of placemaking and Green and Blue Infrastructure.

The site is not within any nationally or locally designated landscape areas; however, the site is within proximity to a number of designated sites where landscape is noted as an important feature. These include the Carmarthen Bay and Estuaries / Bae Caerfyrddin ac Aberoedd Special Area of Conservation (SAC), which is located approximately 320m south of the site at its closest point. The Gower National Landscape – an Area of Outstanding Natural Beauty (AONB) is located approximately 1.2km of the site to the south west at its closest point.

The maximum parameters shown on the submitted Parameter Plan (Drawing no. MH_PP 01) have been set to ensure that there are no significant visual impacts on the National Landscape (AONB) or other environmental designations. The scale of development is similar to that which was previously approved, and the maximum height is the same as that approved for the Pentre Awel development located to the north of the site. As such, it is not considered that the proposed development would be inappropriate in this location.

A Tree Survey & Report and a Tree Constraints Plan have been submitted in support of this outline planning application, outlining the Category A, B, C and U Trees within the survey boundary. The proposed development has been designed to ensure a 3:1 tree replacement (as advocated in PPW12) could be delivered through a subsequent RM application. Due to the nature of this outline planning application which seeks to

consent maximum parameters of development, a detailed assessment of the proposal's impact on trees would be undertaken and submitted with the subsequent RM application.

Hard and soft landscaping areas have been identified through the Illustrative Masterplan (drawing no. MH_IMP 01), which would reduce the visual impact and sensitively and integrate the proposal into the surrounding landscape. Detailed landscaping proposals in line with the outline parameters would be agreed through a subsequent RM application, where a Landscape Appraisal and Scheme.

It is therefore considered that the proposed development would not result in any significant negative landscape or visual impacts. As such, the proposed development is compliant with relevant local and national planning policy.

4.4 Climate Change and Energy Efficiency

PPW states that 'the planning system should support new development that has very high energy performance, supports decarbonisation, tackles the causes of the climate emergency, and adapts to the current and future effects of climate change through the incorporation of effective mitigation and adaptation measures'. As emphasised in PPW12, good design promotes environmental sustainability and contributes to the achievement of the well-being goals. Paragraph 3.7 of PPW12 states that developments should seek to maximise energy efficiency and the efficient use of other resources, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution.

Policy SP2 (Climate Change) of the adopted LDP notes that development proposals which respond to, are resilient to, adapt to, and minimise the causes and impacts of climate change will be supported. In particular, proposals will be supported where they, for example, promote the energy hierarchy by reducing energy demand, promoting energy efficiency and increasing the supply of renewable energy.

The roof of the proposed hotel incorporates a green roof and solar PV, which both contribute towards promoting the energy hierarchy and improving energy efficiency. A green roof, in particular, has the following benefits¹:

- Provides a rainwater buffer through absorbing water through plants, substrate and drainage.
- Purifies the air, with plants acting as a filter and converting CO₂ into oxygen.
- Reduces the ambient temperature with plants absorbing 50% of sunlight and reflecting 30%, resulting in improved indoor temperature regulation.
- Increased solar panel efficiency due to a reduced temperature on the roof.
- Provides a sound barrier to the building through absorbing sound and providing a quieter environment within the building and outside the building.

SuDS features are also proposed to include rain gardens, swales and permeable surfacing. These, along with the proposed landscape features, would provide attenuation during rain events and serve as water treatment. This would improve the quality of the discharged surface water from the proposed hotel site to adjacent watercourses.

The proposed hotel would incorporate net zero approaches to design, contributing towards the building's BREAAAM rating. It is therefore considered that the proposed development would include sufficient measures to respond to and provide resilience against the climate emergency, the details of which would be secured at RM stage. As such, the proposed development would align with local and national policy and is considered to be acceptable from a climate change perspective.

4.5 Quality Design

The importance of the layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings is emphasised in PPW12. PPW12 also explains that good design is not just

¹ <https://www.sempergreen.com/en/solutions/green-roofs/green-roof-benefits#:~:text=A%20green%20roof%20provides%20a,part%20of%20climate%2Dproof%20construction.>

about the architecture of a building but the relationship between all elements of the natural and built environment.

At a local level, LDP Policy GP1 (Sustainability and High Quality Design) states that development proposals will be permitted where they, for example, confirm with and enhance the character and appearance of the site in terms of siting, appearance, scale, height, massing, elevation treatment and detailing. Furthermore, it states that development should not have a significant impact on the amenity of adjacent land uses, properties, residents and the community.

As discussed in chapter 3, the proposed development incorporates the following design principles.

- Positioned within the north-western corner of the site to provide a focal point and an active frontage for surrounding users, supporting accessibility from multiple directions.
- A maximum height parameter of 20m as shown on the Parameter Plan (drawing no. MH_PP 01) to ensure the development is in-keeping with its surroundings including the adjacent Pentre Awel development which also has a maximum height of 20m.
- Up to 50% green roof and up to 50% solar PV, providing a low energy and sustainable design and contributing towards the BREEAM rating of the building. This would also contribute towards CCC's commitment to achieve net zero by 2030.
- Maximised views from the hotel across the golf course and Burry Inlet to the south, providing a connection to nature for guests.
- Clear access and wayfinding for visitors, providing connectivity to the main road network, Millenium Coastal Path and other public transport and active travel routes.
- Sufficient land surrounding the hotel to provide necessary mitigation and enhancement to achieve a biodiversity net benefit at the site.

It is therefore considered that the proposed development incorporates positive design principles, the details of which would be secured at RM stage. As such, the proposed development would align with local and national policy and is considered to be acceptable.

4.6 Access and Transport

PPW12 states that development proposals must seek to maximise accessibility by walking, cycling and public transport, by prioritising the provision of appropriate on-site infrastructure.

At a local level, LDP Policy TR2 (Location of Development – Transport Considerations) notes that proposals which have a potential for significant trip generation will be permitted where it is consistent with the plan's strategic objectives, settlement framework and policies; it is accessible to non-car modes; provision is made for non-car modes of transport and those with mobility difficulties in the design; and travel plans have been incorporated as appropriate.

LDP Policy TR3 (Highways in Developments – Design Considerations) states that the design and layout of all development proposals will, where appropriate, be required to include, for example, an integrated network of convenient and safe pedestrian and cycle routes (within and from the site); suitable provision for access by public transport; and appropriate parking and servicing space. Draft Strategic Policy SP17 (Transport and Accessibility) in the Draft Deposit LDP promotes incorporating design and access solutions within developments to promote accessibility, and adopts a sustainable approach to the design, function and layout of new development, including providing appropriate levels of parking.

A Transport Assessment has been submitted in support of the outline planning application, which includes details of construction traffic management as well as a Framework Travel Plan. The assessment outlines that the development is forecast to generate 42 two-way vehicle trips in the AM peak hour and 44 two-way vehicle trips in the PM peak hour. Four junctions have been assessed using Junctions 10 for roundabouts (ARCADY module). A robust junction assessment methodology has been adopted including nearby committed developments and shows that the proposals would have minimal impact on the local highway network given the scale of the development. As a result, no mitigation is proposed.

The Framework Travel Plan sets out several site-wide measures, as listed below, which could be introduced to encourage walking, cycling and public transport use for future staff members and visitors. Proposed measures have a key focus on walking, cycling and car sharing, with monitoring recommended to increase the proportion of journeys made by sustainable modes.

- Marketing the Travel Plan – travel information pack for new staff (detailing key walking, cycle and public transport routes as part of their induction), and travel plan information boards.
- Minimise single occupancy car travel – improve and increase awareness of the car share database, encourage staff to register with the formal car share system, encourage staff to car-share, develop a guide for staff who car share, priority parking for car shares, and provide a ‘reward’ to those making their first successful car sharing partnership.
- Promotion of public transport use – raise awareness of discounted travel passes and season tickets, raise awareness of the interest free loans available for public transport season tickets, set up notice boards with public transport information, offer travel surgeries, produce a bus route map, display public transport information on the hotel website, set up a Public Transport User Group, and look into negotiation with local bus operators.
- Promotion of cycling – install safe and secure cycle parking, provide lockers and drying facilities, provide showers, promote health benefits of cycling, produce map of safe cycling routes, offer travel surgeries, raise awareness of Bicycle User Group, introduce an awareness campaign such as Bike to Work Week, negotiate staff discounts with local cycle shops, and provide personal safety alarms for staff.
- Promotion of walking – promote health benefits of walking, produce map showing safe walking routes, offer travel surgeries, and continue to explore other incentives that could be offered to staff.
- Servicing and administrative arrangements – encourage the use of tele- and video-conferencing where possible and rationalise deliveries where practicable.

The following transport measures are recommended within the Transport Assessment, which could be agreed through a subsequent RM application.

1. Extension of footpath along the south of the B4304 and provision of an uncontrolled crossing to enable access across to the shared use path to the north of the B4304, which would provide access to public transport links including bus stops along the B4304 and Llanelli Train Station located approximately 1 mile north of the application site;
2. Provision of footways throughout the proposed development site on either side of the access road apart from those areas of the development which will adopt ‘pedestrian prioritised street’ principles;
3. Provision of 22no. sheltered cycle parking spaces to encourage use of active travel modes; and
4. A total of 140no. car parking spaces including 12no. accessible bays and 10no. EV charging bays.

It is concluded that the site is suitable for the type and scale of development proposed and is considered to be acceptable from a traffic and transportation perspective, providing that the above transport measures are implemented and agreed through a subsequent RM application if outline consent is granted.

4.7 Flood Risk and Drainage

At a national level, Future Wales Policy 8 (Flooding) states that flood risk management that enables and supports sustainable strategic growth and regeneration in National and Regional Growth Areas will be supported.

PPW12 states that development should reduce, and must not increase, flood risk arising from river and/or coastal flooding both on and off the development site itself (paragraph 6.6.25). Paragraph 6.6.26 of PPW12 explains that in ‘areas of flood plain currently unobstructed, where water flows in times of flood, built development should be wholly exceptional and limited to essential transport and utilities infrastructure’, and such infrastructure should be designed and constructed to remain operational, even at times of flood.

At a local level, Policy SP2 (Climate Change) of the adopted LDP notes that development proposals which respond to, are resilient to, adapt to, and minimise the causes and impacts of climate change will be supported. In particular, proposals will be supported where they, for example, avoid or minimise the risk of flooding including the incorporation of measures such as SuDS and flood resilient design. Draft Policy CCH5 (Flood Risk Management and Avoidance) states that development located within areas of identified flood risk will only be permitted in exceptional circumstances where, for example, in areas at risk of fluvial, pluvial, coastal and reservoir flooding, where it can be demonstrated that the development meets the justification tests set out in national policy and is supported by robust technical evidence. The draft policy also notes that proposals should seek to incorporate effective and environmentally sympathetic flood risk mitigation measures, such as SuDS.

The application site is partially within Flood Zone C1 and Flood Zone A, and the current allocation in the LDP is led by Policy EMP5, which specifies that provision is made on the allocated site for a *'mix of uses, including commercial leisure as well as providing vital ecological/amenity space and potential mitigation for surface water'*. Concerns based on flood risk were raised by NRW in their response to the pre-application consultation in 2021 for the refresh of previous permission (application ref. S/22567) involving a site area to the east. The response included the following comments (paraphrased):

- Request that an updated hydraulic model and subsequent updated Flood Consequences Assessment (FCA) is submitted to demonstrate the risks and consequences of flooding can be managed to an acceptable level. Clarification on which watercourse surface water would discharge flow into. Clarification is sought on whether the attenuation pond would be utilised during construction.
- Advise that the whole development site should be demonstrated to comply with TAN 15 with particular regard for A1.14 and not just the proposed built development. Any increase in flood depths of 5mm or more are not considered to be acceptable and therefore not compliant with A1.12 of TAN 15 which states that a development must not increase flood risk elsewhere.

Since the pre-application consultation advice above was received in 2021, updated hydraulic modelling and a FCA have been undertaken to demonstrate that the proposed development would manage flooding to an acceptable level. As demonstrated in the FCA, the proposal has been developed to ensure the proposed hotel, which is defined as highly vulnerable development, is located outside of the flood zone and only less vulnerable development (the proposed car park and ecological mitigation) is within the part of the site which is at risk of flooding. Notwithstanding this, all areas of development are proposed to comply with the guidance set out in TAN 15 (2004) and result in no increase of flooding elsewhere. In accordance with the justification test set out in TAN 15 (2004), the proposed development is necessary to contribute to a CCC regeneration initiative, concurs with the aims of PPW12, and the potential consequences of a flooding event for the development have been considered and found acceptable.

A Drainage Strategy has also been prepared in support of the planning application, which outlines the potable water, storm drainage and foul drainage strategy for the scheme. It is proposed to supply the proposed development with potable water from the DCWW potable water network. The proposed foul and surface water drainage strategy elements for proposal are shown on the drawing presented in Appendix D of the Drainage Strategy. The proposals include sustainable drainage measures to deal with surface water discharge, including green roof, rain gardens, swales, permeable paving and an attenuation cell all proposed to treat and attenuate flows before discharge into the existing ditch to the south of the site.

As the application site is within both the adopted LDP's Growth Area (Llanelli) and Future Wales's Swansea Bay and Llanelli National Growth area, it is considered that the proposals comply with the aspirations of Future Wales. It is therefore considered that the proposed development would not result in any significant negative impacts from a flood risk and drainage perspective. As such, the proposed development is compliant with relevant local and national planning policy.

4.8 Cultural Heritage and Archaeology

PPW12 emphasises the importance of protecting, conserving, promoting and enhancing the historic environment. Where planning applications involve less significant archaeological remains that the importance of these remains should be weighed against other factors.

LDP Policy SP13 (Protection and Enhancement of the Built and Historic Environment) requires development proposals to preserve or enhance the historic environment, and Policy EQ1 (Protection of Buildings, Landscapes and Features of Historic Importance) protects sites of historic importance. Furthermore, Draft Policy SP15 (Protection of the Built and Historic Environment) in the Draft Revised LDP notes that proposals are expected to promote high quality design that reinforces local character and respects and enhances the cultural and historic qualities of the plan area.

CCC's Archaeology and Development SPG states that whilst the presence of archaeological remains does not necessarily preclude developments, its importance is underlined as representing an important finite source of information about the past.

An Archaeological Desk-Based Assessment (DBA) was undertaken in 2006, and an Archaeological Field Evaluation was completed in June 2007 by Cambria Archaeology for Llanelli Coast Joint Venture. These documents were submitted and approved as part of a previous application on site (application ref. S/22567). The documents were then used to update an Archaeological Desk-Based and Impact Assessment in 2013 to support two separate planning applications for a new Eco-Park (planning application ref: S/26783) and residential development (planning application ref: S/26784), both of which were subsequently withdrawn. Given the nature of the DBA (2013 update) and its findings, it has been re-submitted with this outline planning application.

The DBA included consideration for this application site. The following sites recorded in the regional Historic Environment Record (HER) Primary Reference Number (PRN) are considered to be of relevance to this outline planning application:

- Site of Machynys House, Machynys Farm (PRN 6995).
- Former Reservoirs (PRN 34018)
- Former Cliff Terrace (PRN 34014)
- Capel Joppa (PRN 34017)
- Brick Row (PRN 34013)
- Brickworks and associated clay pits (PRN 31423)
- Burry Extension Works (PRN 30709)

To preserve any surviving remains that may be encountered during ground-breaking activity, an archaeological watching brief could be undertaken during excavation works if required. Subject to the implementation of a watching brief (if necessary), it is considered that development would accord with PPW12, Policy SP13 of the LDP, and Draft Policy SP15 of the Draft Revised LDP.

4.9 Air, Noise and Light Pollution

Paragraph 3.19 in PPW12 notes that built and natural environment is a key determinant of health and well-being, emphasising that the planning system should identify proactive and preventative measures to reduce health inequalities, including reducing exposure of populations to air and noise pollution.

LDP Policy EP2 (Pollution) states that proposals should seek to minimise the impacts of pollution, and new developments will be required to demonstrate that they do not conflict with National Air Quality Strategy objectives, or adversely affect, to a significant extent, designated Air Quality Management Areas (AQMA).

Draft Policy PSD12 (Light and Air Pollution) of the Draft Revised LDP states that proposals leading to a detrimental impact for air pollution will be permitted where it can be demonstrated that appropriate mitigation measures will be implemented, and incorporated into the development to minimise the adverse effects.

Air Pollution

The site is not located within an AQMA, with the nearest AQMA (Llanelli AQMA) situated approximately 1.8km to the north of the site. The proposed development would not generate any significant emissions, with

the potential for effects limited to the construction stage. Emissions associated with the construction would be minimised through the implementation of appropriate mitigation measures included within a Construction Environmental Management Plan (CEMP), which should follow the principles outlined in the Outline CEMP submitted with this outline planning application.

Noise Pollution

A Noise Report has been submitted in support of this outline planning application, outlining that the potential noise and vibration impacts associated with the construction and operation of the proposed hotel are not considered to be significant. The report states that the entertainment noise target levels of 34 dBL_{Aeq, 5min} indoors would not be exceeded; therefore, no likely significant effect has been identified due to events taking place in the proposed hotel. The predicted car park noise levels would also not exceed the existing ambient noise level; therefore, it is expected that the noise impact of vehicle movements in the proposed car park would not result in a significant effect. The predicted noise emissions from the entertainment and car park at noise sensitive receptors are below the existing ambient noise levels.

Noise arising from construction would be minimised through the implementation of appropriate mitigation measures set out in a site-specific CEMP. An Outline CEMP has been submitted in support of this outline planning application, outlining the approach to construction to ensure a limited effect on the environment. These measures include environmental controls, training for contractors, a package of communication with stakeholders, construction traffic management and measures to minimise air and noise pollution.

Light Pollution

Plans would be submitted alongside the subsequent RM planning application, detailing the approach to lighting. Given that bats are known to be present in the wider area, an ecologically sensitive approach to lighting would be proposed. Night-time working during construction would be avoided to reduce the need for lighting. Details of the approach to minimise the effects of lighting during construction would be included within the site-specific CEMP.

5. Conclusion

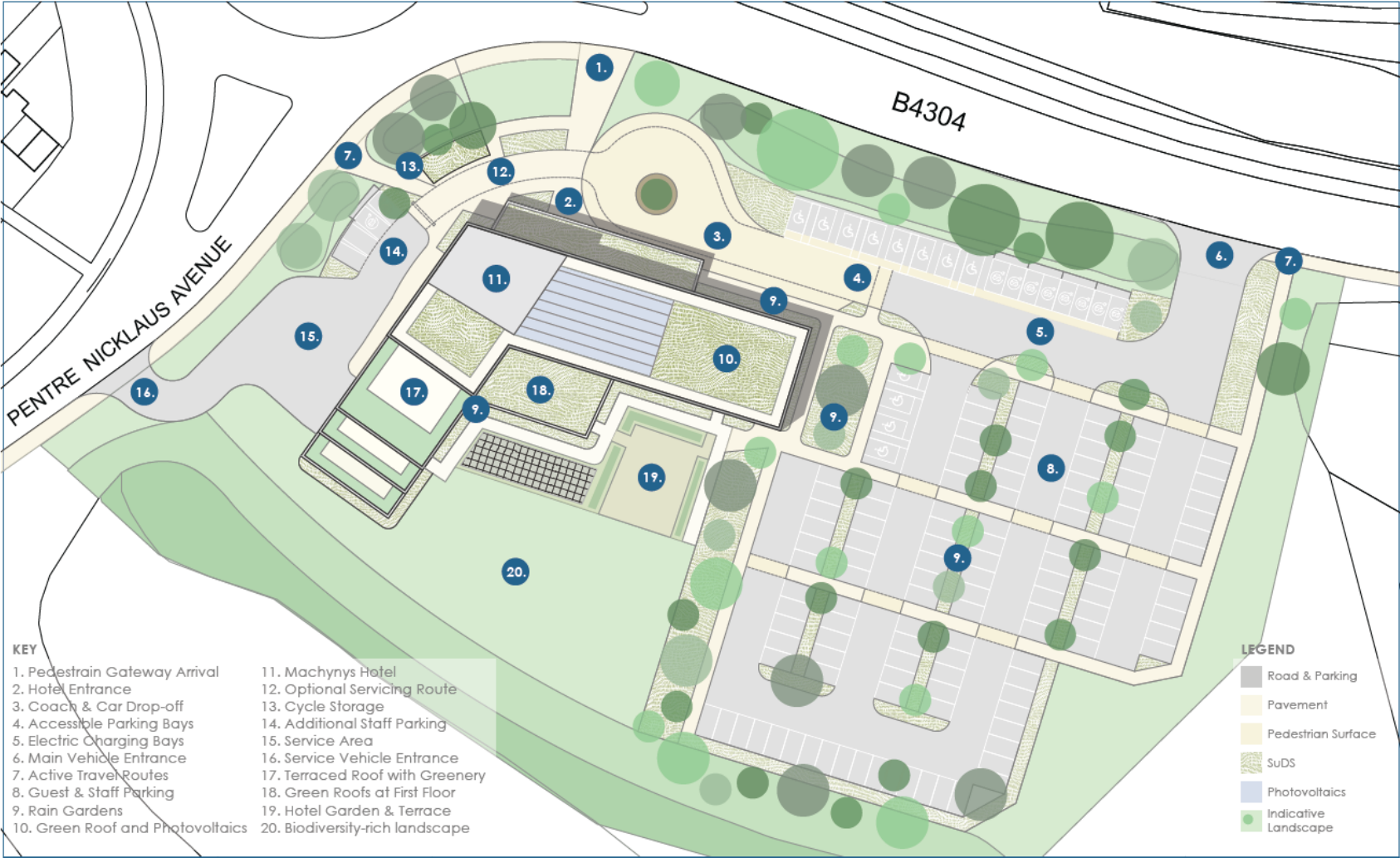
Outline planning permission is sought from CCC for the proposed development of a hotel and associated works, located on land to the east of Pentre Nicklaus Avenue, and south of the B4303, Machynys, Llanelli, Carmarthenshire.

The proposed development would provide a sustainable development, supporting the local tourism and business economy in a sustainable location and contributing positively to the economic and cultural growth of Llanelli and the wider region, in accordance with the aspirations of Future Wales (The National Plan 2040) and the mixed-use allocation within the Adopted Carmarthenshire LDP.

The outline application is supported by numerous technical reports which have not identified any issues which have not been adequately considered within the proposed development's design and associated mitigation measures.

It is therefore considered that the scheme would be an acceptable form of development and outline planning permission should be granted accordingly.

A.1 Illustrative Masterplan (drawing no. MH_IMP 01)



- KEY**
- 1. Pedestrian Gateway Arrival
 - 2. Hotel Entrance
 - 3. Coach & Car Drop-off
 - 4. Accessible Parking Bays
 - 5. Electric Charging Bays
 - 6. Main Vehicle Entrance
 - 7. Active Travel Routes
 - 8. Guest & Staff Parking
 - 9. Rain Gardens
 - 10. Green Roof and Photovoltaics
 - 11. Machynys Hotel
 - 12. Optional Servicing Route
 - 13. Cycle Storage
 - 14. Additional Staff Parking
 - 15. Service Area
 - 16. Service Vehicle Entrance
 - 17. Terraced Roof with Greenery
 - 18. Green Roofs at First Floor
 - 19. Hotel Garden & Terrace
 - 20. Biodiversity-rich landscape

- LEGEND**
- Road & Parking
 - Pavement
 - Pedestrian Surface
 - SuDS
 - Photovoltaics
 - Indicative Landscape

CLIENT Carmarthenshire County Council	SCALE @ A3 1:500	DATE September '24	DRAWN BY BC	REV. A	DESCRIPTION Landscape	DATE 09/10/24	Accommodation Schedule:
JOB TITLE Machynys Hotel OPA	JOB NO. 2475	DRAWING NO. MH_IMP 01	REVISION A				Rooms 18 2P 00 TOTAL 120 UNITS PARKING 140 spaces total 120 Visitor spaces, of which: 52 Disabled spaces 10 Electric Charging spaces 20 Staff spaces
DRAWING TITLE Illustrative Masterplan		© Hammond Architectural Limited 2024 All dimensions must be taken in preference to scaled dimensions and any discrepancies are to be referred to Hammond Architectural Ltd. Contractors, subcontractors and suppliers must verify all dimensions on site before commencing any work or making any working drawings.					

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