

Carmarthenshire County Council

**Machynys Hotel**

Planning, Design and Access  
Statement

Issue | 22 December 2020

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 278688-00

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**ARUP**

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# 1 Introduction

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## 1.1 Overview

This Planning, Design and Access Statement (PDAS) has been prepared by Ove Arup and Partners Ltd ('Arup') and accompanies an application for outline planning permission, with all matters reserved, for a new 140-bed hotel, located on land to the west of Nicklaus Avenue, Machynys, Llanelli, Carmarthenshire.

The application is submitted to Carmarthenshire County Council Local Planning Authority (LPA) on behalf of the Applicant, Carmarthenshire County Council (CCC).

The proposed development is described as follows:

'140-bed hotel with associated car parking, access roads, landscape and infrastructure works, including the importation of material for infilling of land to raise level for the development.'

The proposed development covers an area of approximately 3.7 hectares (ha). Up to 10,000 sqm of Gross Internal Floorspace is to be provided as part of the proposed hotel and the building would not exceed 15 metres (m) in height.

Access to the proposed development is proposed from Nicklaus Avenue, which currently provides access to Machynys Peninsula Golf & Country Club. A second access is available via the B4304 road.

A pre-application meeting was held with the LPA and the agreed approach is included within Section 2.3 of this report. This has formed part of a broader and extensive pre-application consultation strategy.

*Note: The consultation strategy will be described in further detail within a Pre-Application Consultation Report as part of the outline planning application submission.*

## 1.2 Structure of this Document

This PDAS is structured as follows:

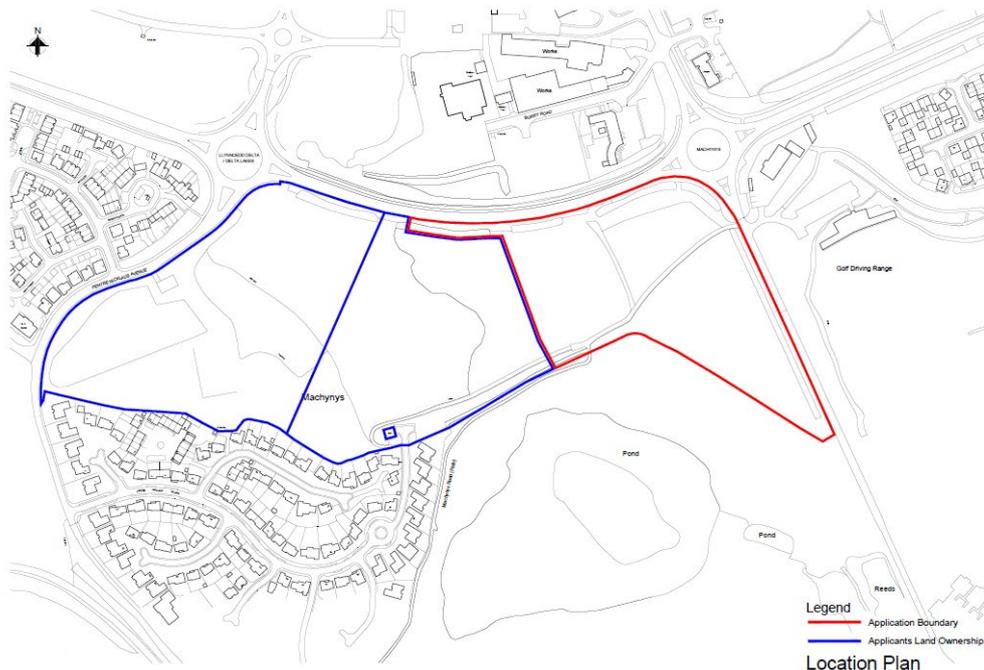
- **Section 2** of this PDAS describes the site location, description, background and list of documents submitted in support the outline planning application.
- **Section 3** presents a statement of the relevant planning policy.
- **Section 4** provides a planning assessment.
- **Section 5** analyses the site and provides a design response.
- **Section 6** provides details of the development proposals including the proposed access arrangements for the site.
- **Section 7** provides a conclusion.

## 2 Context

### 2.1 Site Description

The application site is located approximately 1.5 miles to the south-east of Llanelli town centre and overlooking the Burry Inlet and the Millennium Coastal Path to the south and west. A Site Location Plan is provided at Figure 1.

Figure 1 Site Location Plan



The site is bounded by the B43034 Coastal Link road to the north, the Nicklaus Avenue access road to the Machynys Peninsular Golf & Country Club to the east, and the Club House and golf course to the south. The northern boundary has a number of landscaped bunds, which form a visual screen between the site and the B4304 road. The Pentre Nicklaus Village residential development is situated to the west, with a proposed further residential and eco-park development subject to planning.

The development area covers part of the site occupied by the former Machynys brickworks in the early part of the 20th Century.

The proposed hotel would benefit from views to the south and west, across the golf course and to the Burry Inlet beyond. The beaches of the Gower Peninsular and the Pendine Country Park are all a short drive away.

The application site is ideally located for guests who wish to explore the attractions that South and West Wales has to offer.

## 2.2 Background

On the 10<sup>th</sup> 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 application now seeks outline planning permission for a new 140-bed hotel on the site.

This PDAS now supports the current proposals, and the remaining sections set out the required process and information prepared in support of an outline planning application with all matters reserved.

## 2.3 Pre-application Process

*Note: this section will be updated following the completion of the Pre-application Consultation (PAC) planned between 11<sup>th</sup> January 2021 and 8<sup>th</sup> February 2021.*

CCC as the Local Planning and Highways Authority were consulted at the pre-application stage.

A pre-application meeting was held with CCC as Local Planning Authority on the 1<sup>st</sup> December 2020 online via Microsoft Teams. The draft development proposals were shared at the meeting and the following was agreed:

- The plans should demonstrate the maximum height, width and length of proposed building for an outline planning application.
- The Transport Assessment and associated application plans would show the two options, with access a reserved matter.
- Environmental Impact Assessment (EIA) Screening should be submitted alongside the draft application for pre-application consultation (PAC).
- Habitat Regulations Assessment (HRA) Screening would be undertaken by CCC, informed by a Statement to Inform an Appropriate Assessment (to be produced by the Applicant team).
- An Ecological Impact Appraisal, a Flood Consequences Assessment and a Drainage Strategy should be submitted at outline stage, with a reserved matters application in the future to address noise and air quality if necessary.

A separate pre-application meeting was also held with CCC as Highways Authority on the 7<sup>th</sup> December 2020. The pre-application meeting was held to discuss potential site access arrangements and the scope of the Transport Statement. The Highways Authority confirmed via email dated 14 December 2020 that the approach to the proposed assessment scope and trip generation was acceptable. Following that meeting, technical assessments have been carried out accordingly, with a Transport Statement prepared and provided in support of this outline planning application.

In addition to the formal pre-application activities with the planning and highways authorities, a pre-application consultation is being held between the 11<sup>th</sup> January 2021 and the 8<sup>th</sup> February 2021. The consultation is being undertaken in accordance with The Planning Applications (Temporary Modifications and Disapplication) (Wales) (Coronavirus) Order 2020.

The online consultation involves a pre-application webpage hosted on the CCC website where the proposals are explained and supporting information is available to view. The information is available at:

<https://www.llanelli-waterside.wales/development-opportunities/machynys-hotel/> and <https://www.morlan-elli.cymru/cyfleoedd-datblygu/gwesty-machynys/>

Feedback is welcomed by email or in writing, as detailed on the websites above.

The consultation has been advertised locally on the local authority website, via a letter drop to neighbouring properties, and by display of a site notice.

The aim of this consultation is to give the local community and other stakeholders an opportunity to understand and have their say about / inform the proposals prior to the submission of a planning application.

Full details of the pre-application activities 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).

## 2.4 Application Documents

*Note: this section will be updated following the completion of the Pre-application Consultation (PAC) planned between 11th January 2021 and 8th February 2021.*

Subject to confirmation via a formal Screening Opinion, an Environmental Impact Assessment (EIA) is not required. An EIA Screening Request is submitted alongside the PAC.

It is acknowledged that the proposed development may have the potential to have some minor environmental effects both during construction and operation. As such, environmental studies are provided in support of the application. These consider potential effects during construction and operation and proposed mitigation measures were appropriate.

As such, the outline planning application will be accompanied by the following documents, which are available to view as part of the PAC process:

1. Site Location Plan;
2. Illustrative Site Layout Plan;
3. Illustrative Elevations;
4. Application Summary Document;
5. Planning, Design and Access Statement;
6. Outline Construction Environmental Management Plan;
7. Pre-Application Consultation Report;
8. Transport Statement including Framework Travel Plan and Outline Construction Traffic Management Plan;
9. Ecological Impact Assessment Report;
10. Drainage Strategy;
11. Flood Consequences Assessment; and
12. Geotechnical and Geo-environmental Desk Study Note.

## 3 Planning Policy Context

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### 3.1 The Development Plan

Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 outlines that planning applications are to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

The ‘Development Plan’ is defined by section 38(3) of the Planning and Compulsory Purchase Act 2004 as the regional spatial strategy for the region in which the area is situated (if there is one) and the development plan documents (taken as a whole) which have been adopted or approved in relation to that area.

The Statutory Development Plan for the application site comprises the Carmarthenshire Local Development Plan (LDP) 2006-2021, which was adopted in July 2006. A revised Development Plan (LDP2) for Carmarthenshire is currently being prepared. It is anticipated that the LDP2 will be adopted in late 2021. The Revised 2018-2033 Carmarthenshire Local Development Plan Deposit was published for consultation that ended on the 2nd October 2020.

Whilst the application should be determined based on its accordance with the adopted Development Plan, the LDP2 should be a material consideration in any decision-making process.

#### 3.1.1 Carmarthenshire Local Development Plan 2006-2021

The LDP vision for Carmarthenshire is as follows:

“Carmarthenshire will be a prosperous and sustainable County of contrasts. It will have distinctive rural, urban and coastal communities, a unique culture, a high quality environment and a vibrant and diverse economy... The County will offer a high quality of life within safe, accessible and inclusive communities. Everyone will have access to good quality employment, a suitable mix of housing and to community and recreational facilities – all within a clean and green environment... In spatial terms the county will be characterised by:

- Llanelli fulfilling its potential as a modern and vibrant service centre developing upon its waterfront location.
- Carmarthen continuing to thrive as a prosperous and strategically located service and administration centre retaining its distinctive county town character.
- The ongoing emergence of Ammanford/Cross Hands as a distinctive and diverse Western Valleys based growth area.
- Sustainable socially inclusive communities and efficient local economies centred upon the County’s market towns and larger villages.
- Vibrant rural communities as living, working environments.
- A countryside that is valued and enjoyed by residents and visitors alike.’

The LDP policies considered to be of key relevance to this outline planning application are:

### **Strategic Policies**

**SP1 Sustainable Places and Spaces** – Proposals for development will be supported where they reflect sustainable development and design principles by:

- a. Distributing development to sustainable locations in accordance with the settlement framework, supporting the roles and functions of the identified settlements;
- b. Promoting, where appropriate, the efficient use of land including previously developed sites;
- c. Integrating with the local community, taking account of character and amenity as well as cultural and linguistic considerations;
- d. Respecting, reflecting and, wherever possible, enhancing local character and distinctiveness;
- e. Creating safe, attractive and accessible environments which contribute to people's health and wellbeing and adhere to urban design best practice;
- f. Promoting active transport infrastructure and safe and convenient sustainable access particularly through walking and cycling;
- g. Utilising sustainable construction methods where feasible;
- h. Improving social and economic wellbeing;
- i. Protect and enhance the area's biodiversity value and where appropriate, seek to integrate nature conservation into new development.

**SP2 Climate Change** - Development proposals which respond to, are resilient to, adapt to and minimise for the causes and impacts of climate change will be supported. In particular proposals will be supported where they:

- a. Adhere to the waste hierarchy and in particular the minimisation of waste;
- b. Promote the efficient consumption of resources (including water);
- c. Reflect sustainable transport principles and minimise the need to travel, particularly by private motor car;
- d. Avoid, or where appropriate, minimise the risk of flooding including the incorporation of measures such as SUDS and flood resilient design;
- e. Promote the energy hierarchy by reducing energy demand, promoting energy efficiency and increasing the supply of renewable energy; and
- f. Incorporate appropriate climate responsive design solutions including orientation, layout, density and low carbon solutions (including design and construction methods) and utilise sustainable construction methods where feasible.

Proposals for development which are located within areas at risk from flooding will be resisted unless they accord with the provisions of TAN 15.

**SP3 Sustainable Distribution – Settlement Framework** – Provision for growth and development will be at sustainable locations in accordance with the following Settlement Framework.

The application site is situated within the Llanelli Growth Area.

**SP4 Strategic Sites** – Provision is made within Growth Area settlements for the following Strategic Sites which, either individually, or in combination, contribute to the implementation of the strategy and consolidate the Plan’s sustainable principles.

The application site is located within Strategic Sites ‘Site 3 – South Llanelli Strategic Zone – Machynys – Mixed Use’ (Ref: Policy EMP5, Site Ref: GA2/MU3).

**SP7 Employment – Land Allocations** – Sufficient land is allocated for the provision of 111.13 hectares of employment land for the plan period 2006 – 2021 in accordance with the Settlement Framework.

The application site is located close to GA2/MU9 Delta Lakes, B1 Use Class, 9.78 ha.

**SP9 Transportation** – Provision is made to contribute to the delivery of an efficient, effective, safe and sustainable integrated transport system through:

- a. Reducing the need to travel, particularly by private motor car;
- b. Addressing social inclusion through increased accessibility to employment, services and facilities;
- c. Supporting and where applicable enhancing alternatives to the motor car, such as public transport (including park and ride facilities and encourage the adoption of travel plans), and active transport through cycling and walking;
- d. Re-enforcing the function and role of settlements in accordance with the settlement framework;
- e. Promoting the efficient use of the transport network;
- f. The use of locational considerations for significant trip generating proposals, with design and access solutions within developments to promote accessibility by non-car modes of transport.

**SP10 Sustainable Mineral Development** - Provision will be made for a continuous supply of minerals by:

- a. Maintaining an adequate landbank of permitted aggregate reserves throughout the Plan period;
- b. Encouraging the efficient and appropriate use of minerals; and
- c. Encouraging the re-use and recycling of suitable minerals as an alternative to primary won aggregates.

Mineral Safeguarding Areas (Areas of Search) identified on the Proposals Map to safeguard resources of hard rock, sand and gravel, and coal where they could be worked in the future to ensure that such resources are not unnecessarily sterilised by development. Proposals for extraction of the resource would need to accord with all relevant policies of this Plan.

In interpreting this policy, a landbank is a stock of planning permissions for the winning and working of minerals. It is composed of the sum of all permitted reserves at active and inactive sites at any given point in time and for a given area.

**SP11 Renewable Energy & Energy Efficiency** - Development proposals which incorporate energy efficiency measures and renewable energy production technologies will be supported in areas where the environmental and cumulative impacts can be addressed satisfactorily. Such developments will not cause demonstrable harm to residential amenity and will be acceptable within the landscape. Each proposal will be assessed on a case by case basis.

**SP13 Protection and Enhancement of the Built and Historic Environment** - Development proposals should preserve or enhance the built and historic environment of the County, its cultural, townscape and landscape assets (outlined below), and, where appropriate, their setting. Proposals relating to the following will be considered in accordance with national guidance and legislation.

- a. Sites and features of recognised Historical and Cultural Importance;
- b. Listed buildings and their setting;
- c. Conservation Areas and their setting;
- d. Scheduled Ancient Monuments and other sites of recognised archaeological importance.
- e. Proposals will be expected to promote high quality design that reinforces local character and respects and enhances the local setting and the cultural and historic qualities of the plan area.

**SP14 Protection and Enhancement of the Natural Environment** - Development should reflect the need to protect, and wherever possible enhance the County's natural environment.

All development proposals should be considered in accordance with national guidance/legislation and the policies and proposals of this Plan, with due consideration given to areas of nature conservation value, the countryside, landscapes and coastal areas, including those outlined below:

- a. Statutory designated sites including Ramsar sites, SPAs, SACs, SSSIs and National Nature Reserves;
- b. Biodiversity and Nature Conservation Value, including protected species and habitats of acknowledged importance as well as key connectivity corridors and pathways; (Policy EQ4 and EQ5)
- c. Regional and Locally important sites (and their features) including Local Nature Reserves and RIGS; (see Policy EQ3)
- d. Areas of identified Landscape and Seascape quality; (including SLAs)

- e. Features which contribute to local distinctiveness, nature conservation value or the landscape; (see Policy EQ5)
- f. The Open Countryside; (see Policy GP2)
- g. The best and most versatile agricultural land; (Grade 2 and 3a)
- h. Natural assets: including air, soil (including high carbon soils) controlled waters and water resources. (See Policies EP1 and EP2)

**SP15 Tourism and the Visitor Economy** - Proposals for tourism related developments and for appropriate extensions to existing facilities will be supported where they are in accordance with the locational hierarchy set out in i, ii & iii below and are acceptable in terms of scale, type of development, siting and general impact:

- Within the development limits of Growth Areas and Service Centres - major tourism proposals, including high level traffic generators;
- Within the development limits of Local Service Centres and Sustainable Communities – smaller scale proposals which reflect the character of the area which are appropriate in terms of size, scale and impact;
- Open Countryside – small scale location specific developments that must satisfy policy TSM3, except where they are subject to the provisions of TSM2 and/or TSM5.
- Extensions to existing facilities should be subordinate in scale and function to the existing facility and proposals that constitute substantive extensions should be construed as new development.

### **General Policies**

#### **Policy GP1: Sustainability and High Quality Design -**

Development proposals will be permitted where they accord with the following:

- a) It conforms with and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing, elevation treatment, and detailing;
- b) It incorporates existing landscape or other features, takes account of site contours and changes in levels and prominent skylines or ridges;
- c) Utilises materials appropriate to the area within which it is located;
- d) It would not have a significant impact on the amenity of adjacent land uses, properties, residents or the community;
- e) Includes an integrated mixture of uses appropriate to the scale of the development;
- f) It retains, and where appropriate incorporates important local features (including buildings, amenity areas, spaces, trees, woodlands and hedgerows) and ensures the use of good quality hard and soft landscaping and embraces opportunities to enhance biodiversity and ecological connectivity;

- g) It achieves and creates attractive, safe places and public spaces, which ensures security through the ‘designing-out-crime’ principles of Secured by Design (including providing natural surveillance, visibility, well lit environments and areas of public movement);
- h) An appropriate access exists or can be provided which does not give rise to any parking or highway safety concerns on the site or within the locality;
- i) It protects and enhances the landscape, townscape, historic and cultural heritage of the County and there are no adverse effects on the setting or integrity of the historic environment;
- j) It ensures or provides for, the satisfactory generation, treatment and disposal of both surface and foul water;
- k) It has regard to the generation, treatment and disposal of waste.
- l) It has regard for the safe, effective and efficient use of the transportation network;
- m) It provides an integrated network which promotes the interests of pedestrians, cyclists and public transport which ensures ease of access for all;
- n) It includes, where applicable, provision for the appropriate management and eradication of invasive species.

**Policy GP2: Development Limits** - Development Limits are defined for those settlements identified as Growth Areas, Service Centres, Local Service Centres and identified Sustainable Communities within the settlement framework.

Proposals within defined Development Limits will be permitted, subject to policies and proposals of this Plan, national policies and other material planning considerations.

**Policy GP3: Planning Obligations** - The Council will, where necessary seek developers to enter into Planning Obligations (Section 106 Agreements), or to contribute via the Community Infrastructure Levy to secure contributions to fund improvements to infrastructure, community facilities and other services to meet requirements arising from new developments.

Where applicable, contributions will also be sought towards the future and ongoing maintenance of such provision either in the form of initial support or in perpetuity.

In implementing this policy schemes will be assessed on a case-by-case basis.

**Policy GP4: Infrastructure and New Development** - Proposals for development will be permitted where the infrastructure is adequate to meet the needs of the development.

Proposals where new or improved infrastructure is required but does not form part of an infrastructure provider’s improvement programme may be permitted where it can be satisfactorily demonstrated that this infrastructure will exist, or where the required work is funded by (or an appropriate contribution is provided by) the developer.

Planning obligations and conditions will be used (where appropriate) to ensure that new or improved facilities are provided to serve the new development.

**Policy EMP5: Mixed Use Sites** - Provision is made for mixed use allocations for the following sites:

- The application site is within GA2/MU3 – Machynys Bund - Mix of uses, including commercial leisure as well as providing vital ecological/amenity space and potential mitigation for surface water. No allowance for residential development. Reference should be made to policy SP4 Strategic Sites.

**Policy TR2: Location of Development – Transport Considerations** - Proposals which have a potential for significant trip generation will be permitted where:

- a. It is located in a manner consistent with the plans strategic objectives, its settlement framework and its policies and proposals;
- b. It is accessible to non car modes of transport including public transport, cycling and walking;
- c. Provision is made for the non-car modes of transport and for those with mobility difficulties in the design of the proposal and the provision of on site facilities;
- d. Travel Plans have been considered and where appropriate incorporated.

**Policy TR3: Highways in Developments – Design Considerations –**

The design and layout of all development proposals will, where appropriate, be required to include:

- a. An integrated network of convenient and safe pedestrian and cycle routes (within and from the site) which promotes the interests of pedestrians, cyclists and public transport;
- b. Suitable provision for access by public transport;
- c. Appropriate parking and where applicable, servicing space in accordance with required standards;
- d. Infrastructure and spaces allowing safe and easy access for those with mobility difficulties;
- e. Required access standards reflective of the relevant Class of road and speed restrictions including visibility splays and design features and calming measures necessary to ensure highway safety and the ease of movement is maintained, and where required enhanced;
- f. Provision for Sustainable Urban Drainage Systems to allow for the disposal of surface water run-off from the highway.

Proposals which do not generate unacceptable levels of traffic on the surrounding road network and would not be detrimental to highway safety or cause significant harm to the amenity of residents will be permitted.

Proposals which will not result in offsite congestion in terms of parking or service provision or where the capacity of the network is sufficient to serve the development will be permitted. Developers may be required to facilitate appropriate works as part of the granting of any permission.

**Policy EQ1: Protection of Buildings, Landscapes and Features of Historic**

**Importance:** Proposals for development affecting landscapes, townscapes buildings and sites or features of historic or archaeological interest which by virtue of their historic importance, character or significance within a group of features make an important contribution to the local character and the interests of the area will only be permitted where it preserves or enhances the built and historic environment.

**Policy EQ4: Biodiversity** - Proposals for development which have an adverse impact on priority species, habitats and features of recognised principal importance to the conservation of biodiversity and nature conservation, (namely those protected by Section 42 of the Natural Environment and Rural Communities (NERC) Act 2006 and UK and Local BAP habitats and species and other than sites and species protected under European or UK legislation) will not be permitted, except where it can be demonstrated that:

- a. The impacts can be satisfactorily mitigated, acceptably minimised or appropriately managed to include net enhancements;
- b. There are exceptional circumstances where the reasons for the development or land use change clearly outweighs the need to safeguard the biodiversity and nature conservation interests of the site and where alternative habitat provision can be made in order to maintain and enhance local biodiversity.

**Policy EQ6: Special Landscape Areas** - Special Landscape Areas are designated in the following locations and as identified on the Proposals Map: Carmarthen Bay and Estuaries. Proposals for development which enhance or improve the Special Landscape Areas through their design, appearance and landscape schemes will be permitted (subject to the policies and proposals of this Plan).

**Policy EP2: Pollution** - Proposals for development should wherever possible seek to minimise the impacts of pollution. New developments will be required to demonstrate that they:

- a. Do not conflict with National Air Quality Strategy objectives, or adversely affect to a significant extent, designated Air Quality Management Areas (permitted developments may be conditioned to abide by best practice);
- b. Do not cause a deterioration in water quality;
- c. Ensure that light and noise pollution are where appropriate minimised;
- d. Ensure that risks arising from contaminated land are addressed through an appropriate land investigation and assessment of risk and land remediation to ensure its suitability for the proposed use.

**Policy EP3: Sustainable Drainage** - Proposals for development will be required to demonstrate that the impact of surface water drainage, including the effectiveness of incorporating Sustainable Drainage Systems (SUDS), has been fully investigated.

The details and options resulting from the investigation must show that there are justifiable reasons for not incorporating SUDS into the scheme in accordance with section 8 of TAN 15.

**Policy TSM4: Visitor Accommodation** - Proposals for new build serviced or self-catering holiday accommodation will be permitted within the development limits of defined settlements (Policy SP3) where it accords with the relevant criterion under Policy SP15.

Outside the development limits of defined settlements (Policy SP3) proposals for permanent serviced or self-catering visitor accommodation will be permitted where it consists of the re-use and adaptation (including conversion) of existing buildings and complies with criteria d) and e) set out in Policy H5.

**Policy MPP4: Mineral Safeguarding** - Planning permission will not be granted for development proposals where they would permanently sterilise resources of aggregates and coal identified within the mineral safeguarding areas (areas of search) identified on the proposals map unless:

- a. The applicant can demonstrate that the extraction of the mineral is impracticable, uneconomic or environmentally unacceptable (including compromising amenity and social considerations); or
- b. The mineral resource has already been extracted; or
- c. The mineral can be extracted satisfactorily prior to the development taking place; or
- d. The development is of a temporary nature and can be completed and the site restored within the timescale that the mineral is likely to be needed; or,
- e. The nature and location of the development would have no significant impact on the potential working of the resource.

### 3.1.2 The Emerging Development Plan (LDP2)

The LDP2 references the nearby planned Llanelli Well-being and Life Science Village as reinforcing Carmarthenshire's strategic and regional importance. This is an allocated Strategic Site and is located to the north-west of the application site, on the other side of the B4303. An existing employment area, Delta Lakes, is also an allocated site, located directly to the north of the application site on the other side of the B4303.

Alike to the adopted Local Development Plan, Llanelli is categorised as a main urban centre in the LDP2 with a rich industrial heritage and acting as a focal point for employment and homes.

The LDP2 is proposed to set out the following vision for Carmarthenshire:

‘Carmarthenshire 2033 will be a place to start, live and age well within a healthy, safe and prosperous environment, where its rich cultural and environmental qualities (including the Welsh language) are valued and respected for residents and visitors alike... It will have prosperous, cohesive and sustainable communities providing increased opportunities, interventions and connections for people, places and organisations in both rural and urban parts of our County... It will have a strong economy that reflects its position as a confident and ambitious driver for the Swansea Bay City Region.’

The draft policies considered to be of relevance to this application include:

- Strategic Policy SP5: Strategic Sites
- Strategic Policy SP8: Infrastructure
- INF1: Planning Obligations
- Strategic Policy SP10: The Visitor Economy
- Policy VE2: Permanent Holiday Accommodation
- Strategic Policy SP11: Placemaking and Sustainable Places
- PSD1: Sustainable and High Quality Design
- PSD3: Green Infrastructure Network
- PSD5: Development and the Circular Economy
- PSD11: Noise Pollution
- PSD12: Light and Air Pollution
- PSD13: Contaminated Land
- Strategic Policy SP13: Maintaining and Enhancing the Natural Environment
- NE2: Biodiversity
- Strategic Policy SP14: Protection and Enhancement of the Built and Historic Environment
- BHE2: Landscape Character
- Strategic Policy SP15: Climate Change
- Policy CCH2: Electric Vehicle Charging Points
- Policy CCH4: Flood Risk Management and Avoidance
- CCH5: Renewable and Low Carbon Energy in New Developments
- Strategic Policy SP16: Sustainable Distribution – Settlement Framework
- SD1: Development Limits
- Strategic Policy SP17: Transport and Accessibility
- TRA2: Active Travel
- TRA5: Highways and Access Standards in Development
- Strategic Policy SP18: Mineral Resources
- MR3: Mineral Safeguarding
- WM1: Sustainable Waste Management and New Development

### 3.1.3 Draft National Development Framework - Future Wales: The National Plan 2040 (2019)

The draft National Development Framework, now known as Future Wales: The National Plan, is Wales' national development framework which will set the direction for development in Wales up until 2040. Once formally adopted, it will replace the Wales Spatial Plan and will become a spatial plan for Wales at a national level. The draft document has been published by the Welsh Government and has now been presented to Senedd Cymru, the Welsh Parliament, for scrutiny.

The key policies of relevance to this outline planning application are considered to be:

**Policy 1 – Where Wales will grow:** The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:

- Cardiff, Newport and the Valleys
- Swansea Bay and Llanelli
- Wrexham and Deeside

The National Growth Areas are complemented by Regional Growth Areas which will grow, develop and offer a variety of public and commercial services at regional scale. There are Regional Growth Areas in three regions:

- The South West
- Mid Wales
- The North

Development and growth in towns and villages in rural areas should be of appropriate scale and support local aspirations and need.

**Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking:** The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure.

Urban growth and regeneration should be based on the following strategic placemaking principles:

1. Creating a rich mix of uses;
2. Providing a variety of housing types and tenures;
3. Building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;
4. Increasing population density, with development built at urban densities that can support public transport and local facilities;

5. Establishing a permeable network of streets, with a hierarchy that informs the nature of development;
6. Promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and
7. Integrating green infrastructure, informed by the planning authority's Green Infrastructure Assessment.

Planning authorities should use development plans to establish a vision for each town and city. This should be supported by a spatial framework that guides growth and regeneration, and establishes a structure within which towns and cities can grow, evolve, diversify and flourish over time.

**Policy 8 – Flooding:** Flood risk management that enables and supports sustainable strategic growth and regeneration in National and Regional Growth Areas will be supported. The Welsh Government will work with Flood Risk Management Authorities and developers to plan and invest in new and improved infrastructure, promoting nature-based solutions as a priority. Opportunities for multiple social, economic and environmental benefits must be maximised when investing in flood risk management infrastructure. It must be ensured that projects do not have adverse impacts on international and national statutory designated sites for nature conservation and the features for which they have been designated.

**Policy 28 – National Growth Area – Swansea Bay and Llanelli:** Swansea Bay and Llanelli will be the main focus for growth and investment in the South West region.

Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing, transport and digital infrastructure.

The Welsh Government will work with regional bodies and local authorities to promote and enhance Swansea Bay and Llanelli's strategic role and ensure key investment decisions support places in the National Growth Area and the wider region.

**Policy 29 – Regional Growth Areas – Carmarthen and the Haven Towns:** The Welsh Government supports sustainable growth and regeneration in Carmarthen and the Pembrokeshire Haven Towns (Haverfordwest, Milford Haven, Pembroke and Pembroke Dock). These areas will be a focus for managed growth, reflecting their important sub-regional functions and strong links to the National Growth Area of Swansea Bay and Llanelli. Strategic and Local Development Plans should recognise the roles of these places as a focus for housing, employment, tourism, public transport and key services within their wider areas and support their continued function as focal points for sub-regional growth.

The draft NDF further states that in urban areas (including Llanelli), the enhancement (net-benefit) of biodiversity and the provision of green infrastructure must both shape growth strategies and be fully integrated as part of location and design solutions for proposed development.

### 3.1.4 People, Places, Futures: The Wales Spatial Plan (2008 Update)

The Wales Spatial Plan (WSP) 2008 Update was published by the Welsh Assembly Government in 2008 and sets out the planning agenda for Wales at the spatial level. The vision of the WSP is:

‘We will sustain our communities by tackling the challenges presented by population and economic change. We will grow in ways which will increase Wales’ competitiveness while assisting less well-off areas to catch up on general prosperity levels and reducing negative environmental impacts. We will enhance the natural and built environment and we will sustain our distinctive identity’.

A key theme of the WSP is ‘respecting distinctiveness’, focusing upon ensuring that we sustain and celebrate what is distinctive about Wales in order to promote Wales to the World as well as to Wales’ future economic competitiveness and environmental wellbeing. The WSP specifically states that new development must add rather than subtract character.

The WSP identifies a number of key areas, the proposed development would sit within the ‘Swansea Bay – Waterfront and Western Valleys area’. Key priorities for the area include developing a strong leisure and activity-based tourism industry, reducing economic inactivity and ensuring that environmental protection and enhancement are fully integrated. Within this, Llanelli is considered to be a key settlement, playing a key role in the Area’s local service and employment function.

The WSP highlights the importance of tourism to the Welsh economy and considers that the ‘Swansea Bay – Waterfront and Western Valleys area’ is ‘exceptional in terms of its potential for tourism and leisure’.

## 3.2 Material Planning Considerations

As outlined in Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 applications are to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

The other policy and guidance documents that are material considerations in the determination of both the outline planning application and full planning application in this case are as follows:

- a) Planning Policy Wales, Edition 10 (2018);
- b) Technical Advice Notes (TAN):
  - TAN 4: Retail and Commercial Development;
  - TAN 5: Nature Conservation and Planning;
  - TAN 11: Noise;
  - TAN 12: Design;
  - TAN 13 – Tourism;
  - TAN 15 – Development and Flood Risk;

- TAN 18 – Transport; and
  - TAN 24 – The Historic Environment.
- c) CCC’s adopted Supplementary Planning Guidance (SPG) including:
- Planning Obligations SPG
  - South Llanelli planning and development brief SPG
  - Nature Conservation and Biodiversity SPG
  - Archaeology and Development SPG
  - Adopted Placemaking & Design SPG Report
- d) CCC’s Emerging Local Development Plan (LDP2) – Revised 2018-2033  
Carmarthenshire Local Development Plan Deposit (2020)

### 3.2.1 Planning Policy Wales Edition 10 (2018)

Planning Policy Wales Edition 10 (PPW) (2018) sets out the land use planning policies of the Welsh Government. Within the latest edition, a new emphasis is given to the concept of placemaking, in conjunction with a closer alignment with the Well-being of Future Generations (Wales) Act 2015 (the Well-being Act).

PPW reaffirms the presumption in favour of sustainable development. Within PPW, sustainable development is defined as ‘the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the Well-being Goals.’

In line with the principles of the Well-being Act, PPW is organised around four key themes; ‘Strategic and Spatial Choices’, ‘Active and Social Places’, ‘Productive and Enterprising Places’ and ‘Distinctive and Natural Places’. The policies of most relevance to the proposed development in this case are outlined further below.

Within PPW, it states how planning applications must be determined in accordance with the adopted plan, unless material considerations indicate otherwise.

Chapter 2 People and Places: Achieving Well-being through Placemaking places an emphasis on taking a placemaking approach in order to align with the sustainable development principle. PPW regards placemaking as ‘a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area’s potential to create high quality development and public spaces that promote people’s prosperity, health, happiness, and well-being in the widest sense.’

PPW’s figure 3 identifies the key planning principles for achieving the right development in the right place. One of the principles is to grow the economy in a sustainable manner. PPW specifically states that ‘the planning system should enable development which contributes to long term economic well-being’. Another key principle focuses upon creating and sustaining communities, by ‘creating well-designed places and cohesive rural and urban communities which can be sustained by ensuring the appropriate balances of uses and density...’.

Chapter 3: Strategic & Spatial Choices considers how good design can help to ensure high environmental quality. It states how landscape, green infrastructure and all features of the natural environment should be given consideration during the design process.

Chapter 3 also focuses upon character and how ‘the special characteristics of an area should be central to the design of a development’. Areas that are recognised for a certain characteristic or characteristics, PPW states that ‘it can be appropriate to seek to promote or reinforce local distinctiveness.’

Within design and access statements, PPW states that a clear rationale should be sought regarding the design decisions made based on an analysis of the site and its wider context, a strong vision, performance requirements and design principles. The appraisal of a site’s context should be shown including consideration for the site’s constraints and opportunities. Paragraphs 3.17 PPW specifically sets out what a design and access statement should contain. PPW states:

‘A Design and Access Statement communicates what development is proposed, demonstrates the design process that has been undertaken and explains how the objectives of good design and placemaking have been considered from the outset of the development process. In preparing design and access statements, applicants should take an integrated and inclusive approach to sustainable design, proportionate to the scale and type of development proposal. They should be ‘living’ documents dealing with all relevant aspects of design throughout the process and the life of the development, clearly stating the design principles and concepts adopted and include illustrative material in diagrams, plans, elevations and sections where relevant.’

Within paragraphs 3.37 – 3.44, a focus is provided on strategic placemaking; stating that development plans will provide the basis for sustainable places by identifying areas and sites for new development. In the case of this planning application, the site is allocated within the Adopted Local Development Plan.

PPW also provides consideration for previously developed land, or brownfield land. It states that ‘wherever possible, [it] should be used in preference to greenfield sites where it is suitable for development.’ PPW defines previously developed land as ‘land is that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure. The curtilage of the development is included...’. The site historically formed part of the heavily industrialised coastline of South Llanelli, was historically used as a brickworks, and whilst it currently is largely covered in vegetation, is considered to be brownfield land.

Chapter 4: Active and Social Placemaking and Well-being focuses upon the placemaking component of well-connected cohesive communities. Within this chapter, there is a focus upon movement and considers how development can contribute to promoting sustainable travel. For example, PPW states that Figure 8: The Sustainable Transport Hierarchy for Planning ‘should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport’.

The Hierarchy should be used to prioritise walking, cycling and public transport ahead of the use of private motor vehicles. PPW states that design and access statements should show how the scheme responds to this hierarchy.

Chapter 5: Productive and Enterprising Places covers the economic components of placemaking. Paragraph 5.5.2 states that ‘the planning system encourages tourism where it contributes to economic development, conservation, rural diversification, urban regeneration and social inclusion, while recognising the needs of visitors and those of local communities’. PPW states that ‘there is scope to develop well-designed tourist facilities in urban areas, particularly if they help bring about regeneration of former industrial areas’.

Paragraph 5.5.7 of PPW specifically states that planning authorities should adopt positive approaches to proposals which utilise previously developed or disused land and water bodies for tourism uses.

Chapter 6: Distinctive and Natural Places covers the environmental and cultural components of placemaking. Regarding the historic environment, it states that ‘the planning system must take into account the Welsh Government’s objectives to protect, conserve, promote and enhance the historic environment as a resource for the general well-being of present and future generations.’ One of these objectives specifically seeks to conserve archaeological remains; the conservation of archaeological remains and their settings is a material consideration in determining planning applications. PPW considers that where planning applications involve less significant archaeological remains that the importance of these remains should be weighed against other factors, including the need for the proposed development.

In relation to landscape, PPW states within paragraph 6.3.3 that ‘local authorities should protect and enhance their special characteristics, whilst paying due regard to the social, economic, environmental and cultural benefits they provide, and their role in creating valued places’. Areas of Outstanding Natural Beauty are a statutory landscape designation in Wales and local authorities ‘should give great weight to conserving and enhancing the natural beauty of AONBs, and should have regard to the wildlife, cultural heritage and social and economic well-being of the areas’. PPW also states that local landscapes should be conserved, and where appropriate, enhanced. There is also a presumption against development likely to damage a Site of Special Scientific Interest. Further to this, development can only normally be authorised if the proposed development is ascertained to not adversely affect the integrity of a Special Protection Area, Special Area of Conservation or a Ramsar Site.

In relation to flood risk, PPW states that ‘development should reduce, and must not increase, flood risk arising from river and / or coastal flooding on and off the development itself.

## 3.2.2 Draft National Development Framework - Future Wales: The National Plan 2040 (2019)

### 3.2.3 Technical Advice Notes

PPW is supported by a suite of Technical Advice Notes (TANs) which provide further guidance in relation to specific aspects of development. The TANs of most relevance to the planning applications proposed in this case are outlined below.

**TAN 5: Nature Conservation and Planning (2009)** provides advice on how planning proposals should contribute to protecting and enhancing biodiversity and geological conservation. Regarding determining planning applications, TAN 5 advises that local authorities should contribute to the protection and improvement of the environment, protect wildlife and natural features in the wider environment, and should avoid harm to nature conservation, minimise unavoidable harm by mitigation measures and offset residual harm by compensation measures.

TAN 5 states that planning applications should ensure that the information submitted is proportionate to the likelihood of effects on nature conservation interests and to their potential significance.

**TAN 11: Noise (1997)** contains guidance related to assessing the noise impacts of proposed development and outlines mitigation measures which can be introduced to control noise. TAN 11 considers how commercial developments may cause noise issues particularly as activities at these premises can extend late into the evening.

**TAN 12: Design (2016)** contains the design principles that should be considered for any new development. It sets five considerations which must be included within the design of new buildings listed below:

- a) Accessibility: Including ease of access for all into the development and to all elements within the site;
- b) Character: Including sustaining or enhancing local character.
- c) Community Safety: Including securing through natural surveillance.
- d) Environmental Sustainability: Including achieving efficient use and protection of natural resources; and
- e) Movement: Promoting sustainable means of travel.

**TAN 13 – Tourism (1997)** provides guidance relating to tourism development. TAN 13 states that hotels should be compatible with neighbouring uses. In relation to transport, TAN 13 states that car parking and access requirements may vary according to the scale and type of activity for which a hotel is intended and its location. Access and waiting areas should also be designed to avoid congestion and minimise turning movements.

**TAN 15 – Development and Flood Risk (2004)** provides technical guidance in relation to development and flooding and sets out a precautionary framework to guide planning decisions in respect of development in areas at high risk of flooding. It provides guidance on how to fully assess flood consequences and how to design and implement SUDS.

A consultation on a revised draft of TAN 15 drew to a close on 17 January 2020 and responses are currently being reviewed.

The Updated TAN aims to:

- replace the development advice map with a new Wales flood map
- place a greater emphasis on the development plan and the value of strategic flood consequences assessments
- integrate guidance on coastal erosion with flood risk issues in TAN 15
- provide guidance for regeneration initiatives affecting communities in flood risk areas

**TAN 18 – Transport (2007)** offers guidance on the integration between the planning system and transport. It contains detailed guidance on parking, active travel, public transport and major transport infrastructure as well as information on how transport impacts should be assessed within Environmental Statements, Transport Assessments/Statement and Travel Plans.

**TAN 24 – The Historic Environment (2017)** aims to provide guidance as to how the planning system should consider the historic environment during plan-making and decision-making. It provides guidance on all aspects of the historic environment including Archaeological Remains.

### 3.3 Supplementary Planning Guidance (SPGs)

#### 3.3.1 Planning Obligations SPG (2014)

This SPG was published by CCC and sets out the authority’s approach to planning obligations, in what circumstances they may be required and what they may include.

#### 3.3.2 South Llanelli Planning and Development Brief SPG (2014)

Published by Carmarthenshire County Council, this SPG provides guidance for the consideration and determination of development proposals for the South Llanelli Strategic Zone (Site 3 within the adopted LDP). The Zone is located along Llanelli Waterside and includes Machynys.

The SPG describes that South Llanelli is strategically located within close proximity to the M4 and the London-Fishguard rail link. It states that the area benefits from tourism with the Millennium Coastal Park being a key attraction.

The SPG states that the delivery of the South Llanelli Strategic Zone would significantly contribute to meeting the LDP Strategy as well as the wider aspirations of the Wales Spatial Plan.

The SPG provides an assessment of the C1 and C2 flood risk designations for the sites within the Zone, and concludes that for the application site (reference GA2/MU3 in the SPG), circa 50% of the allocation is subject to Flood Zone C1, the highest level of flood risk, and that due regard will need to be given to the provisions of TAN 15. It states that the prominence of land within Flood Zone C1 will inform the land uses proposed for the area within this brief.

Developers will be expected to incorporate SuDS into their proposals and be supported by comprehensive drainage strategies and flood consequence assessments where appropriate.

The SPG underlines that it will be important for proposals to sensitively integrate with the surrounding coastal and urban landscape, and that consideration will be given to the visual effect of proposals.

Within the Zone, the SPG notes that regard should be had for the built, historic and industrial heritage of the area.

### **3.3.3 Nature Conservation and Biodiversity SPG (Undated, Draft)**

Published by CCC, the Nature Conservation and Biodiversity SPG provides guidance for identifying the potential for projects and proposals to impact on biodiversity.

The SPG states that a Habitat Regulations Assessment may be required to determine whether a project is likely to have a significant effect on a European site. It is the case that if proposals are likely to have a significant effect, then an Appropriate Assessment may be required.

### **3.3.4 Archaeology and Development SPG (Undated)**

Published by CCC, the Archaeology and Development SPG provides guidance relating to the handling of archaeology in the planning process. It states that ‘whilst the presence of archaeological remains does not necessarily preclude development, it is recognised that they represent an important finite source of information about the past’.

### **3.3.5 Adopted Placemaking & Design SPG Report (2016)**

Published by CCC, this SPG provides guidance relating to and promotes high quality, sustainable design within the County. It sets out guidance in relation to a number of aspects including responding to the landscape character, Special Landscape Areas, green infrastructure and assets and built character.

The SPG underlines the importance of new development respecting the unique variety of landscapes within Carmarthenshire.

New developments should integrate into the existing landscape, and contribute to local distinctiveness and animate the character of a place.

Landform and topography are also key considerations for the siting of development, with the SPG stating that new development should be designed to complement the topographic form.

Guidance regarding accessibility is also provided within the SPG. Ensuring that a development is accessible via all modes including walking and cycling is underlined as an important consideration, along with connecting with surrounding development. Where possible, new development should have access to public transport.

Appropriate parking should be provided including for bicycles, motorcycles and cars. Parking provision should be considered early in the design process, and should not dominate the landscape and compromise the character and quality of a place.

The public realm is highlighted as being a key consideration for new development. Appearance and safety are important considerations for example, providing windows that overlook the street to provide natural surveillance.

## 4 Planning Policy Assessment

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### 4.1 Introduction

This section provides a planning assessment of the key policy considerations for the proposed development against the adopted Local Development Plan. This assessment also includes Planning Policy Wales, Edition 10 (2018), the Draft National Development Framework – Future Wales: The National Plan 2040 (2019), The Wales Spatial Plan (2008), the relevant Technical Advice Notes (TANs) and Supplementary Planning Guidance (SPGs), and the emerging Local Development Plan.

Important policy considerations are summarised below into key themes and presented with an explanation of how the proposed development aligns with local and national adopted planning policy.

### 4.2 Principle of Development

The adopted LDP allocates the application site for mixed use development, incorporating residential, amenity (Eco park) and commercial leisure in Machynys (Site Reference: GA2/MU3; Policy Reference: EMP5). The site is also located within Strategic Site 3 – South Llanelli Strategic Zone (Policy SP4). The proposed use of the site as a hotel would align with the aspiration for commercial leisure on the site and has been established through the previous consent for a hotel on the site (planning application ref. S/22567).

The adopted LDP underlines Llanelli as a primary key settlement and playing a critical role for the ‘Swansea Bay – Waterfront and the Western valleys’ Spatial Area. This Spatial Area is also identified within the WSP, where a key priority for the area is to develop a strong tourism industry.

A clear strategy for the adopted LDP is to encourage growth within Llanelli. Policy SP3 ‘Sustainable Distribution – Settlement Framework’ reinforces this, by including Llanelli within the identified Growth Areas. The draft Future Wales also includes Llanelli as within a National Growth Area (Policy 1); Welsh Government support growth in employment and within Swansea Bay and Llanelli. The emerging LDP2 also include Llanelli as a Principle Centre (draft policy SP16).

LDP policy SP15 ‘Tourism and Visitor Economy’ demonstrates CCC’s support for tourism related development, citing growth areas as supportive locations. LDP policy TMS4: Visitor Accommodation also states that proposals will be permitted within the development limits where it accords with LDP policy SP15. Draft LDP2 policies SP10 and VE2 also lend support to the proposed development. The proposed development would support CCC’s aims to develop a strong tourism industry within this area, supporting economic activity in the region.

The South Llanelli Planning and Development Brief SPG (2014) emphasises the importance of delivering the South Llanelli Strategic Zone to contributing the LDP Strategy and the proposed development would help to achieve this by providing benefits to the local economy, tourism and businesses.

Draft LDP2 policy SP10 also supports proposals for the visitor economy. It is considered that the proposed development would be of a high quality and contribute positively to the surrounding natural and built environment and would add value to the visitor economy. It is further considered that the site is sustainably and appropriately located, in line with draft LDP2 policy SP10.

PPW supports the development of tourist facilities and encourages a positive approach to be adopted by planning authorities for proposals which use previously developed or disused land for tourism uses. PPW also specifically states that this should be particularly the case for the regeneration of former industrial areas, which is the case for this application. The proposed development would contribute a hotel that would bring benefits to local tourism by providing a new, and high-quality accommodation for visitors to explore Carmarthenshire and surrounding areas.

There are 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 (policy SP7, reference: GA2/MU9) known as Delta Lakes. The draft LDP2 also identifies the Life Science and Well-being Village, Llanelli Strategic Site (site reference: PrC2/SSI, Strategic Policy SP5) which is also located close to the site of the proposed development.

It is considered that the principle of developing a hotel at this site would accord with local and national policy and has been established by the historic consent on the site.

### 4.3 Sustainable Development

At the national level, PPW sets out a presumption in favour of sustainable development, which is ‘the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the Well-being Goals’.

The presumption for sustainable development flows through to the local level through LDP policy SP1 ‘Sustainable Places and Spaces’ which confirms CCC’s support for proposals that reflect sustainable development. Draft LDP2 policy SP11 also includes a placemaking and sustainable places policy, stating that development should contribute towards the creation of attractive, cohesive, safe places. Draft Future Wales policy 2 also supports the growth and regeneration of towns and states that there should be support for positively contributing towards building sustainable places.

It is considered that this application proposes a sustainable development because:

- a) It would contribute positively to the sustainable development of the region by contributing to the local economy through the provision of jobs and attracting visitors to the region. The site would also make use of previously developed land; the site formed part of the heavily industrialised coastline of South Llanelli.

- b) It is considered that the site is located within a sustainable location and benefits from nearby access to public transport. It is further considered that the proposed development's location would also be in accordance with the settlement framework within the adopted LDP, as it is within the Llanelli Growth Area, as is discussed in further detail within section 4.2.
- c) The proposals seek to promote environmental sustainability at the site, including with the aim of seeking to protect and enhance the site's biodiversity value. The indicative layout proposed seeks to integrate significant amounts of landscaping. Although the detail of this is a reserved matter, it could provide benefits in terms of creating a biodiverse habitat onsite.
- d) The detailed design, energy strategy and sustainability measures on site are reserved for further approval by CCC as the LPA and would be required to accord with LDP policy SP1.
- e) The site would be sustainably managed regarding waste and would therefore be in accordance with LDP policy SP1 and also draft LDP2 policy WM1 which states that proposals must ensure that provision is made for the sustainable management of waste in all new development.

It is considered that the proposed development would constitute sustainable development and would align with local and national policy.

## 4.4 Quality Design

A requirement for well-designed places is set out within PPW, where a focus is provided on employing a placemaking approach in order for developments to be sustainable.

LDP policy GP1 identifies principles that proposed developments should be in accordance with, including reflecting and / or enhancing the character and appearance of a site; designed to an appropriate scale; and creates an attractive, safe place. Emerging LDP policy PSD1 also states that proposals should be high quality and present a positive understanding of local characteristics. The WSP underlines the importance of distinctiveness, and states that new development must add rather than subtract character. PPW echoes this.

TAN 12 sets out that accessibility, character, community safety, environmental sustainability and movement should be of key consideration when designing a new development. The Adopted Placemaking & Design SPG (2016) also has helped to provide guidance relating to design and placemaking.

The design of the proposed development is a reserved matter for planning, however, consideration has been given on the indicative plans to maximising the site's potential to create a high quality development in which provides benefits including to prosperity and well-being. This includes providing a layout which maximises views across to River Loughor and the Gower Peninsula, providing significant areas of landscaping and setting maximum heights and extents which would be of an appropriate scale and massing to integrate the development into the local area.

TAN 12: Design (2016) has been used to guide the development of the proposals by considering the following within the early stages of the development proposals: accessibility to, from and within the site; character; community safety; environmental sustainability and movement. Whilst details relating to the appearance of the proposed development are a reserved matter, the concept of the hotel has been designed to be sensitive to the local character. As will be discussed later within this section, consideration towards ensuring the proposed development would be environmentally sensitive has also been considered, including regarding adaptation to and mitigation of climate change.

The site is currently unused, and it is considered that the proposed development would serve to enhance the site by providing a high quality, aesthetically pleasing, integrating development. It is considered that the proposed development would accord with local and national policy as it would provide an enhancement compared to the existing site and would comprise a quality design.

## 4.5 Access and Sustainable Transport

PPW states that development proposals must seek to maximise accessibility by walking, cycling and public transport. It also states that where necessary, proposals should mitigate transport impacts. The transport hierarchy should be used in relation to new development and should be considered within the Design and Access Statement.

At a more local level, the adopted LDP sets out a number of transport-specific policies including policies SP9, TR2 and TR3. Draft LDP2 policy SP17 also states that development should reduce the need to travel, enhance accessibility to employment and provide access for walking and cycling.

The site is located on the Machynys Peninsula to the immediate south of the B4304 road. The site is bounded to the north by the B4304 road, to the east by the access road to Machynys Peninsula Golf Course, to the south by the Golf Course itself and to the south-west by Machynys Mound (with the Pentre Nicklaus residential development beyond).

Machynys Peninsula also accommodates the existing Pentre Nicklaus residential development, which is accessed via the newly constructed roundabout junction on the B4034. The Machynys West and Delta Lakes developments are also accessed via this modified junction.

In line with the adopted transport related LDP policies, the proposed development has been designed to promote travel by walking and cycling and enable movement by those with mobility difficulties, by creating a safe and legible transport environment on the site.

The proposed development would be within proximity to existing bus stops and Llanelli railway station, providing various opportunities to travel by sustainable travel modes to and from the proposed development. The site would also benefit from being within walking distance of Llanelli town centre.

Draft LDP2 policy CCH2 states that proposals for development will be required to install electrical sockets suitable for charging electric vehicles.

For non-residential developments where car parking is provided, at least 10% of those bays should have ULEV charging point, with rapid charging points where this is feasible. Parking facilities for electric vehicles will be included as part of the proposed development, however, it is noted that all parking elements including electric vehicle charging will form part of any future reserved matters application.

Pre-application feedback on the proposed access arrangements has been received from the local highways authority, with further detail provided in the Transport Statement that accompanies the application.

Vehicular access to or from the application site would be via the B4304 / The Avenue (New Dock Road) and/or Machynys Peninsular Golf and Country Club access road.

TAN 18 offers guidance regarding proposals and transport and provides advice for Transport Assessments.

A Transport Assessment has been carried out and it forecasts that the development would generate 55 two-way vehicle trips in the AM peak hour and 60 two-way vehicle trips in the PM peak hour. The development is therefore not considered to have a significant impact on the local highway network. Five junctions, agreed with CCC, were assessed in terms of traffic impact and were found to be unaffected by the proposals.

Other impacts upon the transport network arising from the operation of the hotel can be appropriately mitigated by careful junction and access design at Reserved Matters stage and through a detailed Travel Plan. A framework Construction Traffic Management Plan is included within the Transport Assessment and outlines measures to minimise the impacts of construction traffic on the adopted highway.

It is considered that the proposed development would align with local and national policy regarding transport and access and there would be no unacceptable impacts on the adopted highway.

## 4.6 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 climate change and adapts to the current and future effects of climate change through the incorporation of effective mitigation and adaptation measures’.

Policy SP2 of the LDP reaffirms PPW’s stance that development proposals will be supported which respond to, are resilient to, adapt to and minimise the causes and impacts of climate change. The draft LDP2 reiterates this within draft strategic policy SP15.

Adopted LDP policy SP1 further states that proposals will be supported where they reflect sustainable development and design principles such as by utilising sustainable construction methods where feasible.

Sustainable principles, which support the attainment of LDP policy SP2, that could form part of the reserved matters proposals, include: use of renewable / low carbon energy sources, high standards of energy efficiency, measures to reduce waste and increase recycling, incorporating measures to enhance biodiversity such as green walls and roofs, conserving water resources, creating floorplans that are flexible and adaptable, and measures to create a convivial internal environment which reduces the need for mechanical heating or cooling.

LDP policy SP11 further states that development proposals which incorporate energy efficiency measures and renewable energy production technologies will be supported in areas where the environmental and cumulative impacts can be addressed satisfactorily. Whilst the energy strategy for the site is a reserved matter, the proposed development would follow largely the same layout as the previously approved scheme which sought to deliver a low energy, sustainable design strategy. The proposed development would seek to promote the energy hierarchy by reducing energy demand and promoting energy efficiency. Sustainability principles in accordance with policies SP1 and SP2, which have been embedded within this outline scheme, include:

- An overarching principle of development to support a resilient economy and facilitate growth within the high value tourism sector.
- Creating an indicative layout that would optimise solar gains and natural day lighting to reduce the need for artificial heating and lighting.
- Offering significant amounts of landscape to enhance biodiversity.
- Including sustainable drainage onsite to minimise the risk and impact of flooding.

It is considered that the proposed development could include sufficient measures to respond to and provide resilience against climate change, to be secured at reserved matters stage. It is therefore considered that the proposed development would align to local and national policy.

## 4.7 Pollution

Within the adopted LDP, policy EP2 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).

The emerging LDP2 includes a policy relating to air pollution (draft policy PSD12) which states that proposals that will lead to a detrimental impact from 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.

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 also not generate any significant emissions and it is considered that the potential for effects is limited to the construction stage. Emissions associated with the construction would be minimised through the implementation of appropriate mitigation measures which would be included within a Construction Environmental Management Plan (CEMP).

It is considered that the proposed development would not conflict with National Air Quality Strategy objectives.

TAN11 provides guidance relating to noise and notes that commercial developments can cause noise concerns.

The site is not located within a Noise Action Plan Priority Area (NAPPA). The closest NAPPA to the site is located within the centre of Llanelli to the north of the site.

There would be some increase in noise associated with the use of the site. The proposed development would result in an increase in the number of people in the area and the number of vehicles visiting the site.

Noise arising from construction would be minimised through implementation of appropriate mitigation measures set out in a site-specific Construction Environmental Management Plan (CEMP). An Outline CEMP will be provided as part of this outline planning application. A significant effect on the environment would not be expected.

Plans would also be submitted alongside the reserved matters 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 will be avoided to reduce the need for lighting. Details of the approach to minimise the effects of lighting would be included within a CEMP.

An Outline CEMP, which indicates measures which could be implemented to manage construction effects, is provided. 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.

A Geo-environmental and geotechnical desk study note is also provided as part of this application. Further investigations have been recommended for a more comprehensive understanding of the geotechnical constraints of the site. To summarise the initial findings:

- Buried obstructions are expected to be encountered due to the historic use of the site.
- The ground levels will need to be raised due to the risk of flooding.
- The previous ground investigation undertaken on-site has indicated isolated areas of contamination (arsenic, lead, Dibenzo (a,h) anthracene) within the made ground. No potential asbestos containing materials were visually identified during the site investigation.

It is considered that, subject to further investigation work and implementation of mitigation measures, the proposed development would accord with local and national policy and would not result in any unacceptable impacts on air quality, noise, lighting and ground contamination.

## 4.8 Natural Environment

Within the adopted LDP, Strategic Policy 1 states that proposals will be supported where they reflect 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. Draft LDP2 policy BHE2 states that development proposals should relate to specific landscape and visual characteristics of the local area.

LDP Strategic Policy 14 states that development should protect and wherever possible, enhance the county's natural environment. LDP policy NE2 states that proposals should seek to maintain and enhance biodiversity and development will not be permitted where it would result in an adverse impact on priority species, habitats and features of recognised principal importance to the conservation of biodiversity and nature conservation except in certain circumstances. Draft LDP2 policy NE2 echoes these principles, that proposals should seek to maintain and enhance biodiversity.

The adopted and emerging LDP, and the draft Future Wales, underline the importance of landscape, with the draft Future Wales stating that local authorities should protect and enhance their special characteristics.

The Nature Conservation and Biodiversity SPG states that a Habitat Regulations Assessment 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.

TAN 5 also stresses the importance of protecting and improving the environment, avoiding harm to nature conservation, minimising unavoidable harm and offsetting with compensation measures where necessary.

An Ecological Impact Assessment has been undertaken, following ecological surveys undertaken at the site during December 2020 and a review of previous surveys undertaken between 2004 and 2020. The report considers that no further species-specific surveys are required, except for pre-construction checks for badger, otter, water vole and invasive non-native plant species. It is considered that with the proposed mitigation measures contained within the report, that it would be unlikely that the proposed development would have a significant negative impact upon the ecological receptors on site and in the local area.

The indicative site layout includes new ponds, a new reed and associated planting that would connect the site to habitats in the wider area. Additional biodiversity enhancement measures could be included at reserved matters planning stage, including but not limited to the installation of bird and bat boxes on site, log / brush piles on site and the consideration of green roofs for the hotel.

An Outline CEMP is to be submitted alongside this application, which includes measures to minimise construction impacts upon the natural environment. These include; ecological toolbox talks, procedures to be adopted on unexpected discovery of protected species, measures for vegetation clearance and measures for protecting those trees and vegetation to be retained.

Adopted LDP policies SP10 and MPP4, and draft LDP2 policy MR3, relate to mineral development. The LDP allocates the site within proximity to a Sand and Gravel Mineral Safeguarding Area (Category 1) (MPP3) to the south-east of the site (shown in the diagonal brown lanes in Figure 2), and the River Loughor and an area of the Golf Course are designated as Areas of International and National Nature Conservation (SP14) (shown in green).

The emerging LDP identifies the site within a Category 1 Sandstone Safeguarding area (MR3) (shown in brown hatching in Figure 3), and near to a Category 1 Superficial sand and gravel deposits safeguarding area (MR3) (shown in black diagonal lines); and near a Site of Special Scientific Interest (SSSI) (Machynys Ponds – SP13) (shown in light green vertical lines). To the south and west of the site, there is a Ramsar site (Burry Inlet - SP13) (shown in light green hatching); a Special Protection Area (Burry Inlet - SPA) (shown in dark green diagonal lines); a SSSI (Burry Inlet and Loughor Estuary - SP13) (shown in light green vertical lines); and a Special Area of Conservation (Carmarthen Bay and Estuaries / Bae Caerfyrddin ac Aberoedd - SAC – SP13) (shown in light green diagonal lines).

It is considered that the proposed development would not adversely impact upon the Mineral Safeguarding Area, and that it would still be possible for the site to enable access for mineral extraction in the future.

Figure 2 Carmarthenshire Local Development Plan 2006-2021 Proposals Map

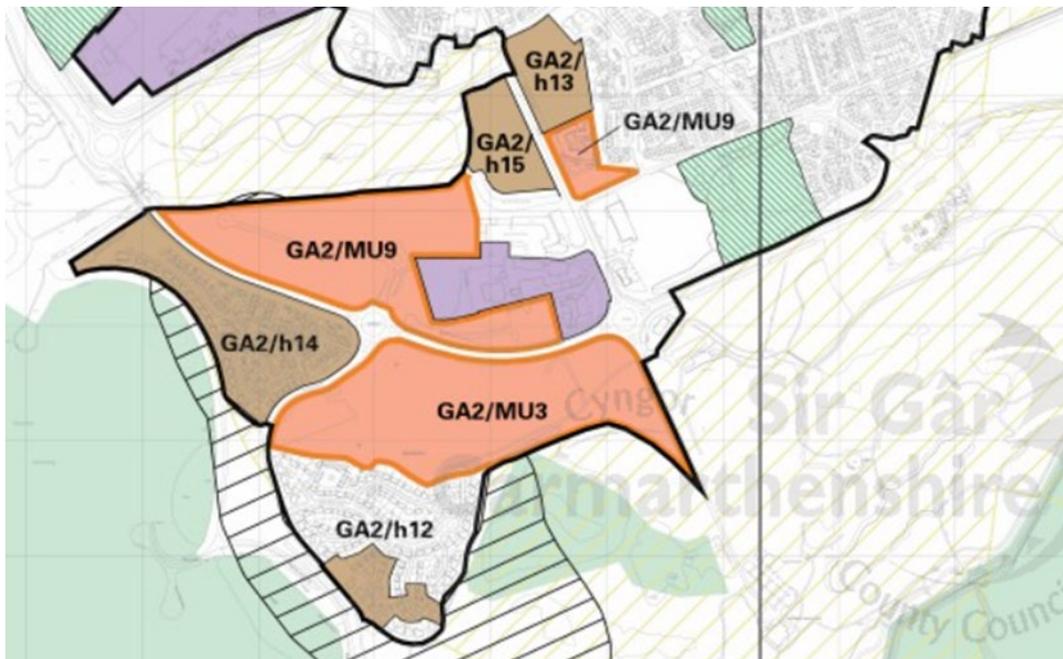
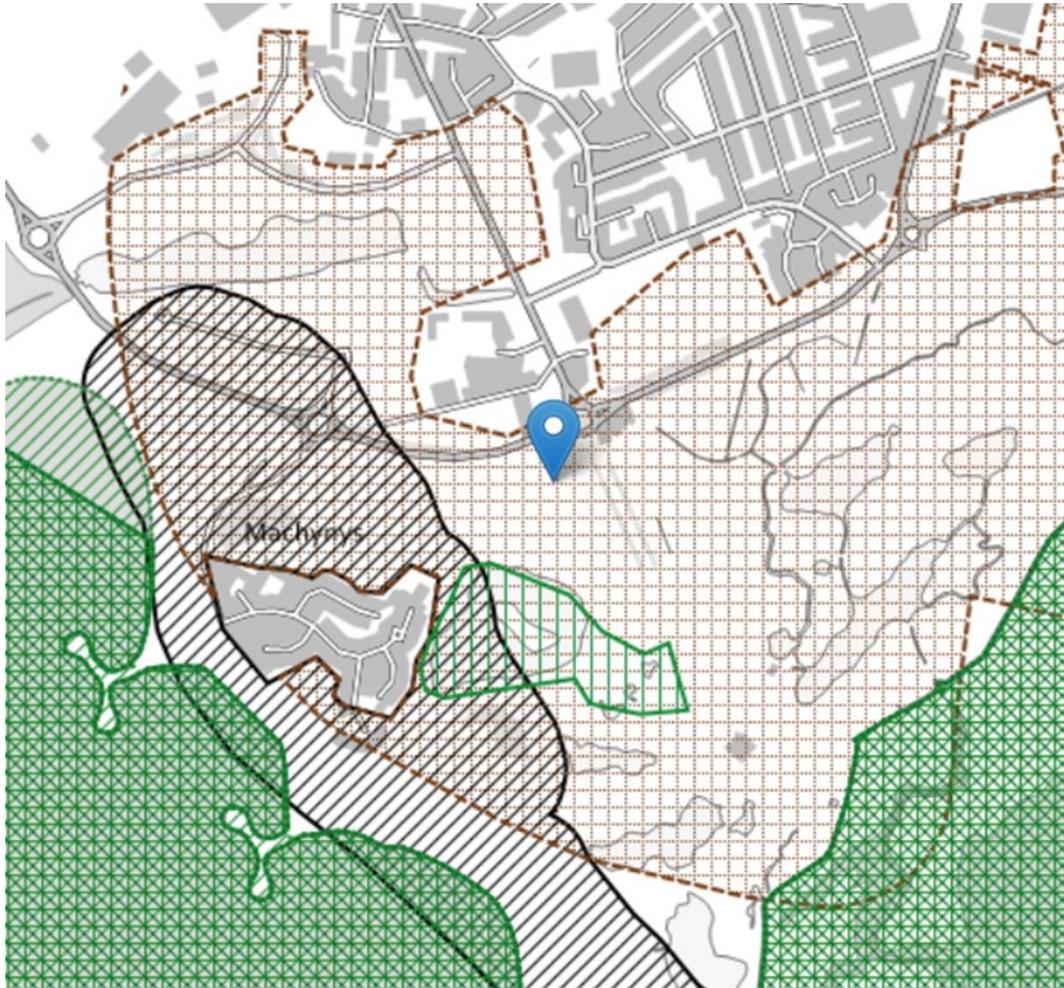


Figure 3 The Revised 2018-2033 Carmarthenshire Local Development Plan Deposit (January 2020) Environmental Designations Map



It is considered that overall the proposed development would be sensitively designed in keeping with the local environment and would put in place suitable mitigation to minimise effects on nature conservation.

## 4.9 Landscape and Visual Impact

PPW affirms that it is important for landscape to be considered during the design process. In particular, PPW underlines that great weight should be given to conserving and enhancing the natural beauty of areas of outstanding natural beauty (AONB) and that there is a presumption against development likely to damage a SSSI. PPW also states that development can only normally be authorised if the proposed development would not adversely affect the integrity of a SPA, SAC or a Ramsar site.

LDP policy SP14 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 ENQ6 also states that proposals which enhance or improve Special Landscape Areas, such as Carmarthen Bay and Estuaries, will be supported.

The site is not located within any nationally or locally designated landscape areas, however the site is within proximity to the following environmental designations:

- a) Pyllau Machynys (Machynys Ponds) Site of Special Scientific Interest (SSSI) is located within approximately 100m of the site to the south.
- b) Burry Inlet and Loughor Estuary is located within approximately 550m of the site to the west.
- c) Burry Inlet Special Protection Area (SPA) and RAMSAR (Wetlands of International Importance) is located within approximately 550m of the site to the west.
- d) Carmarthen Bay and Estuaries / Bae Caeryrddin ac Aberoedd is located within approximately 550m of the site to the west.
- e) North Dock Dunes Local Nature Reserve is located within approximately 1km of the site to the north-west.
- f) Gower Area of Outstanding Natural Beauty (AONB) is located within approximately 1.5km of the site to the west at its closest point.
- g) No SINC's or other non-statutory sites have been identified.

The maximum parameters shown on the Illustrative Layout Plan, set at outline stage, have been considered to ensure that there are no significant visual impacts on the AONB or other environmental designations.

There are no Tree Preservation Orders on site, however an arboricultural report would be provided as part of any future reserved matters application to assess any impacts upon trees and hedgerows, if required. Replacement planting would be sensitively incorporated into development to minimise visual impact if necessary.

Landscaping would be incorporated into the development. Details regarding this are a reserved matter for planning but the indicative layout provides a significant area for hard and soft landscaping to reduce the visual impact of the development and sensitively integrate it into the landscape. It is considered that these details would demonstrate that the proposed development would be acceptable from a landscape perspective. A Landscape Appraisal and Landscaping scheme would be submitted as part of any future reserved matters planning application.

The Flood Consequences Assessment undertaken to support the application recommends that the site is raised to a minimum development level of 6.87m AOD to ensure that the site would be resilient to flood events. Any visual impact arising from the increase to site levels would be assessed and managed via

Landscape Appraisal and Landscaping scheme to be submitted at reserved matters stage.

It is considered that the proposed development would not result in any significant negative impacts upon landscape or designated landscape areas, and it is therefore considered that the proposed development would align with local and national policy regarding landscape.

## 4.10 Cultural Heritage and Archaeology

PPW underlines the importance of protecting, conserving, promoting and enhancing the historic environment. PPW states that where planning applications involve less significant archaeological remains that the importance of these remains should be weighed against other factors.

LDP policy SP13 requires that development proposals preserve or enhance the historic environment and policy EQ1 protects sites of historic importance.

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 the previous application on site ref. S/22567.

The DBA included consideration for the site, Machynys East. The site boundary includes the site of Machynys Brickworks Llanelli (Primary Record No. (PRN): 40762); Machynys Brickworks (PRN DAT9037); and Machynys (PRN DAT31419).

On the recommendations of the DBA, the application site was investigated as part of the Field Evaluation. There was no conclusive evidence of the brickworks structure. The amount of brick rubble suggests that it had been completely demolished prior to site investigation. Two concrete surfaces were identified at the site and have been assessed to be clearly a later reuse of the site, although their function is unknown.

It is considered that the site is of limited archaeological value. To preserve any surviving remains 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 the PPW and Policy SP13.

## 4.11 Flood Risk and Drainage

LDP policy SP2 states that development proposals which respond to, adapt to and minimise the causes and impacts of climate change will be supported. It specifically states that proposals will be supported where they avoid, or where appropriate, minimise the risk of flooding including the incorporation of measures

such as SuDS and flood resilient design. The draft LDP2 considers flood risk within policies SP15 and CCH4.

Additional to this, the draft Future Wales policy 8 states that flood risk management that enables and supports sustainable strategic growth and regeneration in National and Regional Growth Areas will be supported.

The application site is within the adopted LDP's Growth Area (Llanelli) and the draft Future Wales's Swansea Bay and Llanelli National Growth area, an area of focus for strategic economic growth.

PPW states that development should reduce flood risk on-site and must not increase flood risk elsewhere. TAN 15 – 'Development and Flood Risk' (2004) provides development advice to determine when flood risk issues need to be taken into account in development proposals. The development advice map shows that the site is within Flood Zone C1 which refers to areas of the floodplain which are developed and served by significant infrastructure, including flood defences. Flood Zone C1 indicates that development can take place subject to application of justification test, including acceptability of consequences.

From 7th January 2019, all new developments of more than 1 dwelling house or where the construction area is 100 square meters or more, will require sustainable drainage systems (SuDS) for surface water. The SuDS must be designed and built in accordance with Statutory SuDS Standards and an application will be made to Carmarthenshire County Council acting in its SuDS Approving Body (SAB) role, before any construction work begins. LDP Policy EP3 also requires that proposals will be required to demonstrate that the impact of surface water drainage, including the effectiveness of EUDS has been fully investigated. A pre-application is to be submitted to the SAB separately to the application for outline planning permission.

A Flood Consequences Assessment has been undertaken and submitted as part of this application. The assessment has recommended that the site is raised to a minimum development level of 6.87m AOD. The post-development results confirm that with this, the site would remain flood free in the event of a potential breach in the existing defences for events up to and including the 1 in 1000-year tide return period, including climate change estimated for the year 2120. The service road and building levels will be set above minimum levels recommended in the FCA and illustrated within drawing refs. GC1001-P01 'Proposed Finished Levels' and GC1002-P01 'Proposed Formation Levels' to reduce the risk of flooding and to ensure safe access for emergency vehicles at all times. The assessment concludes that the risk of flooding for the proposed development is acceptable in accordance with TAN 15, and that there is no significant change to the flood risk of third parties as a result of the development.

A Drainage Strategy has also been submitted as part of this application and includes proposed strategies for the supply of potable water and drainage. The point of connection for the foul drainage to the DCWW network is to the 150mm sewer to the south west of the site, adjacent to the existing Nicklaus Coast Villages Sewerage Pumping Station. DCWW are still to confirm that the proposed neighbouring residential development has been included in their assessment. It is yet to be confirmed by DCWW. Within the Drainage Strategy, sustainable drainage

measures are proposed to deal with surface water discharge. These include rain gardens, swales, permeable paving and an attenuation pond to treat and attenuate flows before discharge into the existing watercourse to the south of the site.

It is not considered that the development would have any significant implications for flood risk or drainage that cannot be mitigated through surface water management design.

## 5 Site Analysis and Design Response

The application site is located within the southern area of Llanelli, which historically formed part of the docks and was used as a brickworks in the 19<sup>th</sup> Century the first half of the 20<sup>th</sup> Century.

The site is currently vacant and benefits from public access linking Nicklaus Avenue to the Millennium Coastal Path. The site immediately adjoins the Machynys Golf Club to the south and east.

The established Pentre Nicklaus and Machynys residential developments and new development at The Links are located to the west but have no retail or local services to support residents.

To the north is Delta Lakes Enterprise Centre which includes a mix of office, commercial and light industrial uses in one and two-storey buildings.

*(image: Google Earth)*

Figure 4 – Land uses and facilities (not to scale)

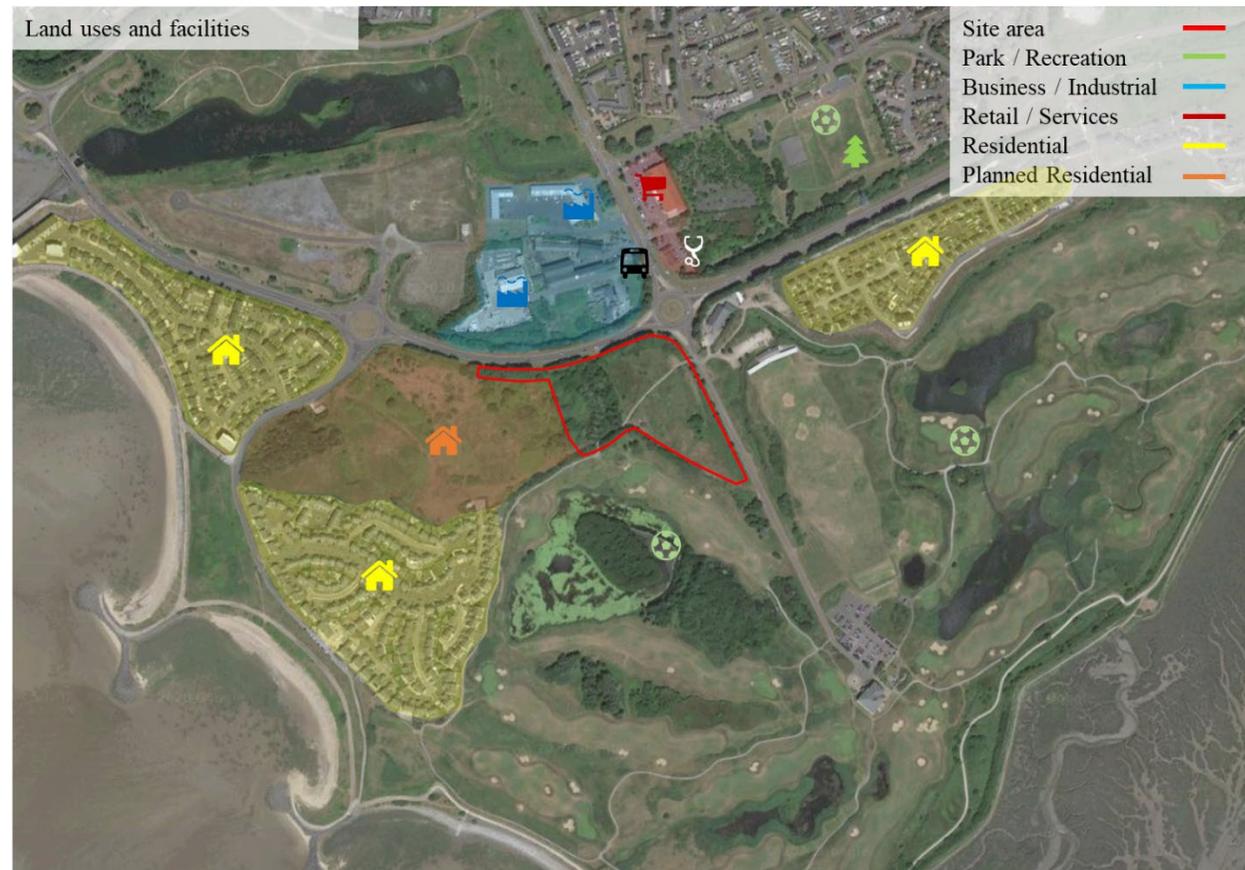
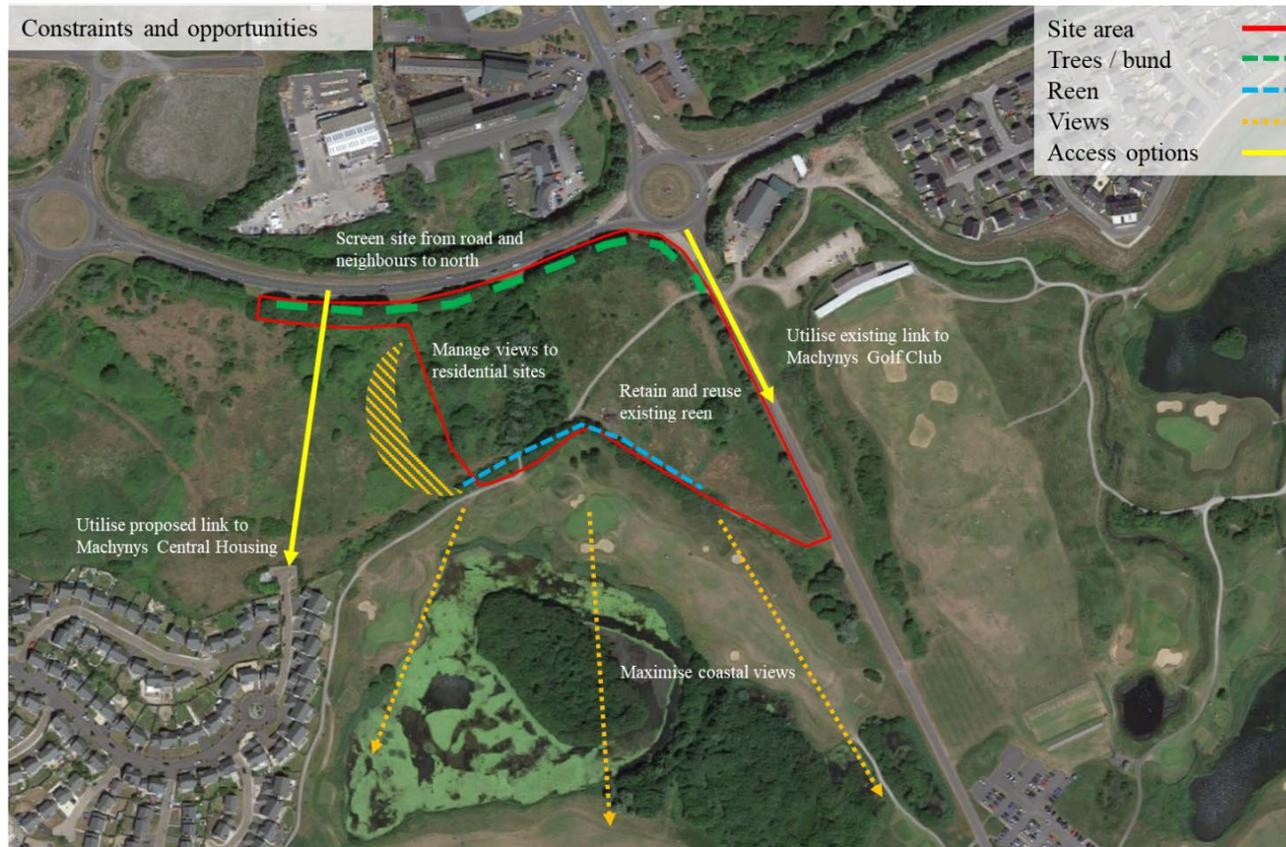


Figure 5 – Constraints and opportunities



The application site benefits from a southerly aspect, which offers impressive views out towards the Machynys Golf Club and the Gower Peninsula beyond.

The site also benefits from good transport links with bus stops on the B4304 and further vehicular access from Nicklaus Avenue. The site is proposed to adjoin a new road link between the B4304 and via the Pentre Nicklaus site.

The site has an existing bund and vegetation on the northern boundary. This could be utilised and enhanced to minimise air and noise pollution to the site.

The existing reen to the southern boundary should be retained for biodiversity and flood risk management benefits.

*(image: Google Earth)*

The proposed development would seek to become a high-quality destination for visitors to the area and also provide a location for meeting and conferences for businesses, along with banqueting facilities for various events.

The hotel would comprise 140 guest rooms and would have sufficient space within the proposed parameters set out within Figure 7 to include a number of different ancillary facilities, such as a restaurant, bar and lounge as well as meeting, conference and function rooms.

The design of the proposed development has been influenced by various opportunities and constraints. This has included:

- a) The relationship of the hotel with the coastal link road and developments surrounding the site.
- b) A low energy and sustainable design strategy.
- c) Minimising the proposed development's impact on ecology and habitats.
- d) Enhancing the ecology and / or creating new habitats on site.
- e) Flood consequences assessment.
- f) Minimising loading on the existing drainage systems.
- g) Maximising the views from the hotel across the golf course and Burry Inlet to the south.
- h) Access and wayfinding for visitors.
- i) Security.

The proposed development illustrated in the indicative layout is considered to respond positively to the site's location, orientation and the views. The proposed development would be designed to respond positively and reflect the local character of the area, integrating well into the surrounding landscape. The orientation of the site would be south-facing, maximising views and sunlight.

A significant proportion of the site would be landscaped, with space for recreation. This would tie in well with the surrounding green-natured developments such as the Llanelli Wellness Centre, as well as complementing the more rural, coastal landscape surrounding the site.

An early consideration for the site has been legibility and connectivity through, to and from the site. Whilst access is a reserved matter, access arrangements have been considered in principle. The primary access to the site would be via Nicklaus Avenue, a single carriageway which currently provides access towards the golf course. This would be used as a primary access for visitors. The secondary access would be via a new access off the B4303 to the north-west of the site. This would provide access for staff and servicing.

Figure 6 – Illustrative Site Layout (not to scale)

Although all matters are reserved, two indicative plans set out how the proposed development could be laid out.

The first provides an indication of building, hard and soft landscaping areas. Please refer to the Illustrative Site Layout Plan in support of the application and see Figure 6 for an extract.

The second outlines the maximum parameters for the height, scale and massing of the proposed development. Please refer to the Illustrative Elevations in support of the application and see Figure 6 for an extract.



Figure 7 – Illustrative Elevations including Maximum Height and Massing (not to scale)

The outline application would secure consent for the following maximum parameters:

**Height:**

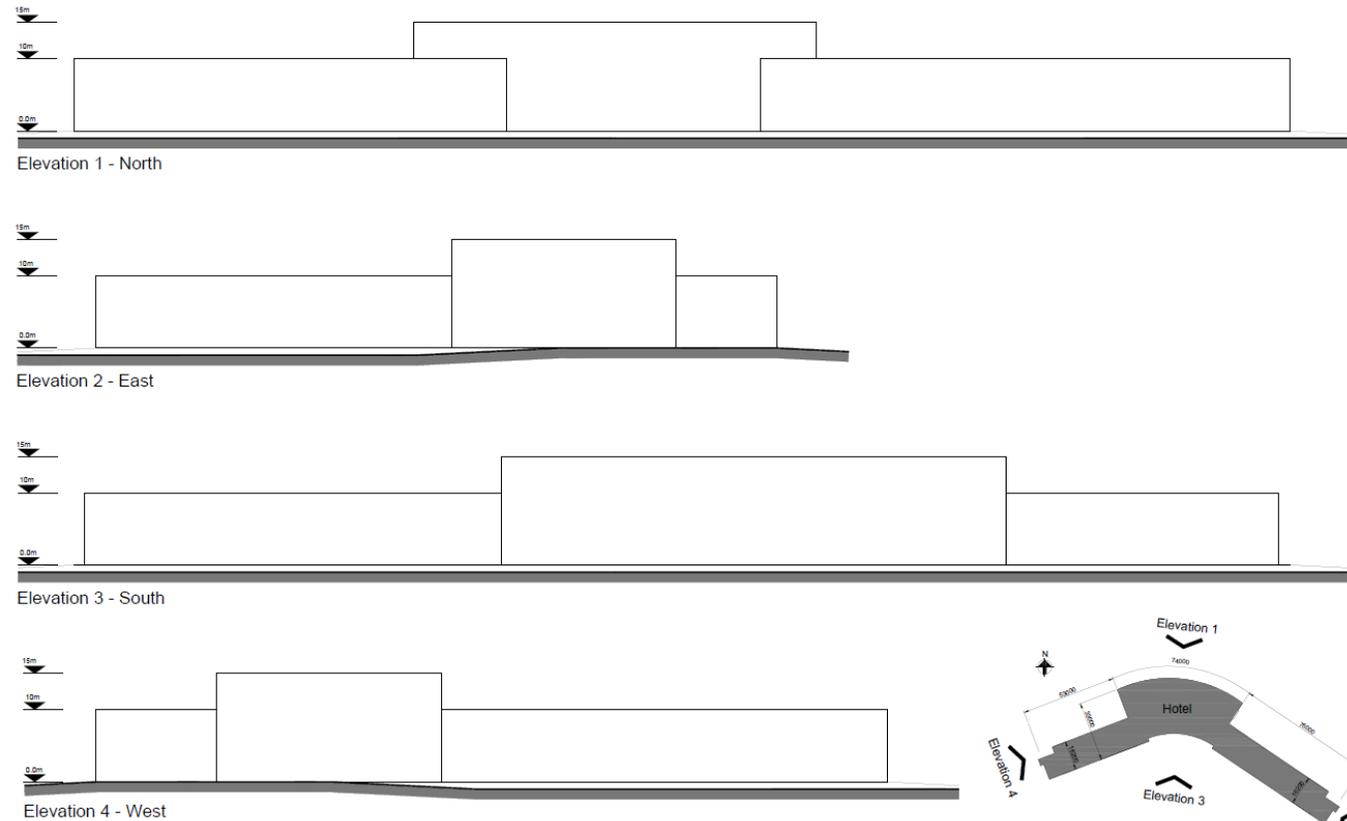
- up to 15 metres

**Length:**

- up to 202 metres

**Depth:**

- up to 33 metres



Illustrative Elevations

## 6 Conclusions

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An application for outline planning permission is intended to be submitted to CCC for the proposed development of a 140-bed hotel, located on land at Machynys East, Llanelli, Carmarthenshire.

Subject to ongoing discussions with the local authority highways department and Machynys Peninsular Golf & Country Club, access to the hotel would be provided via Nicklaus Avenue. A second access would be available from the B4304. At this outline planning stage, it is anticipated that the site's primary access would be from Nicklaus Avenue, while a dedicated emergency and service vehicle access would be taken from the B4034 via a new access road to the west of the site. That arrangement would help ensure that the hotel can be serviced discretely, keeping staff and service vehicles separate from guest vehicles if required.

The service road and building levels will be set above minimum levels to mitigate the risk of flooding and provide safe access for emergency vehicles.

The proposed development would provide a sustainable development, supporting the local tourism economy in a sustainable location and contributing positively to the economic and cultural growth of Llanelli and the wider region.

The proposed development would be in accordance with the Development Plan and national planning policy. The site is allocated within the adopted Carmarthenshire Local Development Plan and would align with the development aspirations of this part of Llanelli.

The environmental information and technical reports have not identified any reason why outline planning permission should not be granted, subject to the implementation of appropriate mitigation measures.

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