

Carmarthenshire County Council
Machynys Hotel
Pre-Application Summary Document

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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.

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1 Introduction

1.1 Overview

This Pre-Application Summary Document has been prepared by Ove Arup and Partners Ltd ('Arup') and accompanies a pre-application consultation (PAC) for outline planning permission, with all matters reserved, for a new 140-bed hotel and associated works. The proposed development would be located on land to the west of Nicklaus Avenue, Machynys, Llanelli, Carmarthenshire.

This document summarises the key information in support of the PAC and is available in English and Welsh languages (on request).

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

1.2 Structure of this Document

This document is structured as follows:

- a) **Section 2** describes the site location, description, background and list of documents submitted in support the outline planning application.
- b) **Section 3** provides a planning assessment and design response.
- c) **Section 4** provides a conclusion.

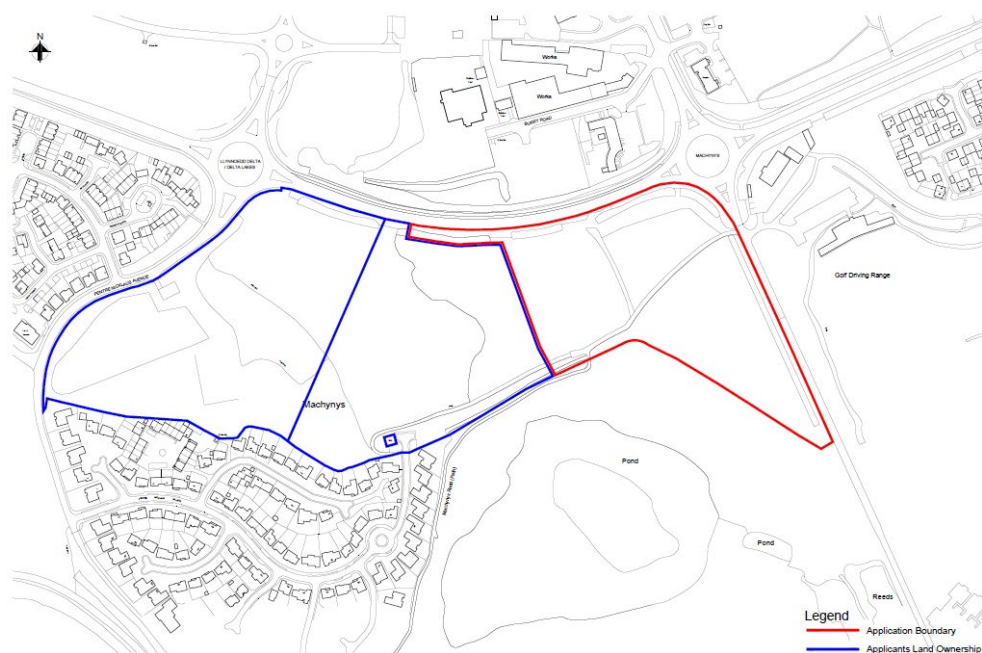
2 Proposed Development

2.1 Site Description

The proposed development is a 140-bed hotel with associated car parking, access roads, landscape and infrastructure works, including the importation of material for infilling of land to raise levels for the development.

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 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 would be from Nicklaus Avenue, which currently provides access to Machynys Peninsula Golf & Country Club. A second access would be available via the B4304 road.

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

This application now seeks outline planning permission for a new 140-bed hotel and associated works on the site.

This document now summarises 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

A pre-application meeting was held with the Local Planning Authority on 1st December 2020. The draft development proposals were shared at the meeting and the requirements for PAC were agreed.

A separate pre-application meeting was also held with the Highways Authority on 7th December 2020. The meeting discussed potential site access arrangements and the scope of the Transport Statement.

Those meetings have helped inform the development of the information being shared as part of the PAC process.

The PAC is being held between 11th January 2021 and 8th February 2021. The consultation is being undertaken in accordance with The Planning Applications (Temporary Modifications and Disapplication) (Wales) (Coronavirus) Order 2020.

The consultation involves a 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

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, in addition to this summary document and the forthcoming PAC Report, 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. Planning, Design and Access Statement
5. Outline Construction Environmental Management Plan;
6. Transport Statement including Framework Travel Plan and Outline Construction Traffic Management Plan;
7. Ecological Impact Assessment Report;
8. Drainage Strategy;
9. Flood Consequences Assessment; and
10. Geotechnical and Geo-environmental Desk Study Note.

3 Assessment and Design Response

3.1 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.

3.2 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.

3.3 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.
- 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.

3.4 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.

3.5 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.

3.6 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.

3.7 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 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.

3.8 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

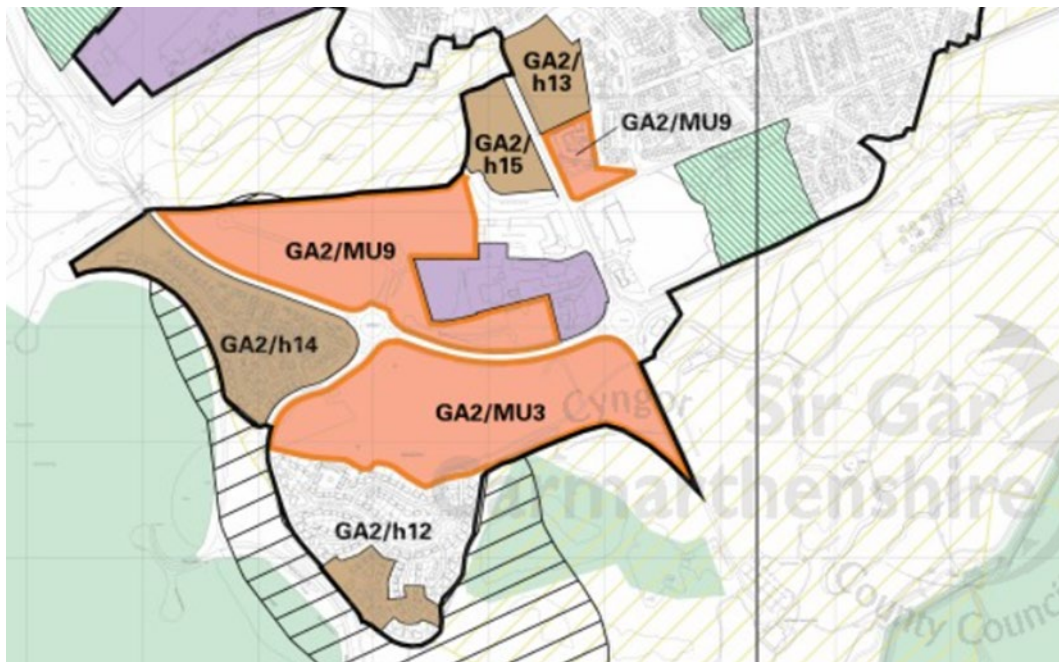
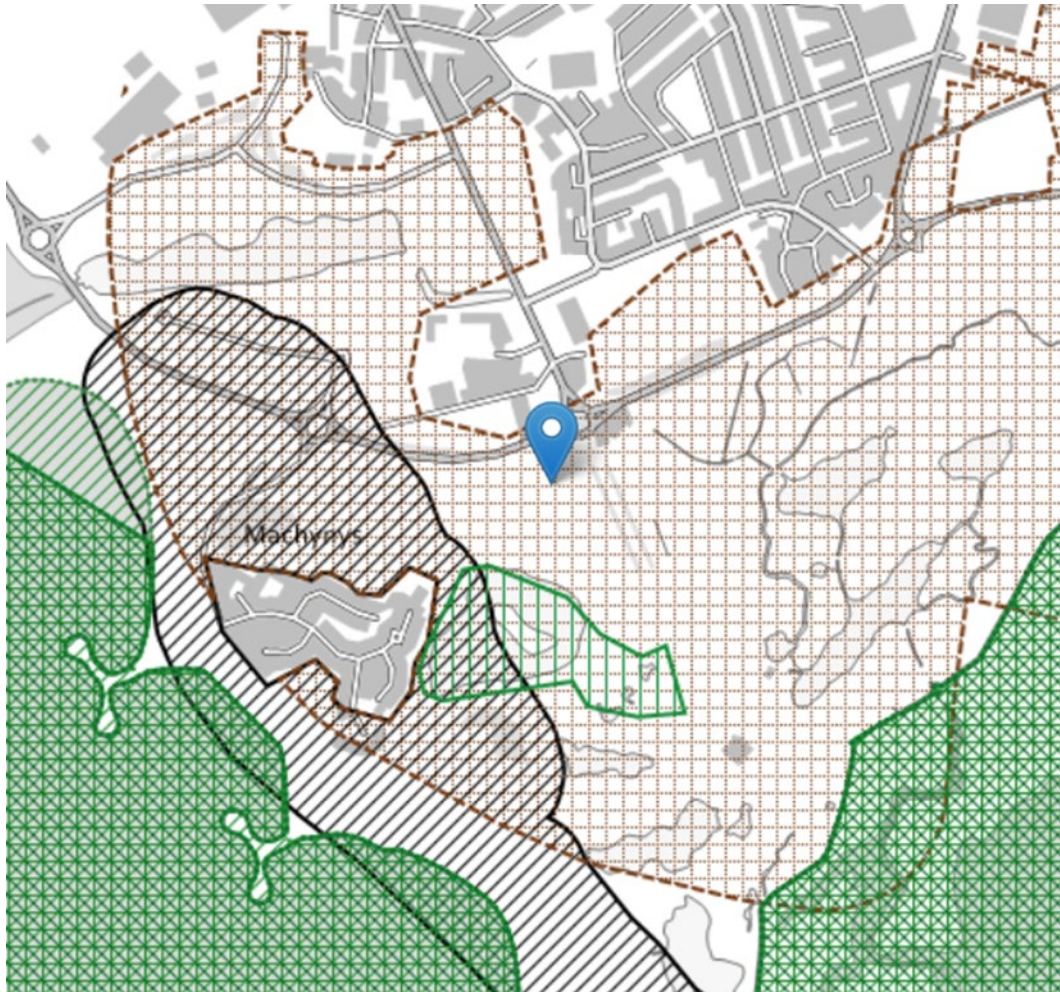


Figure 3 The Revised 2018-2033 Carmarthenshire Local Development Plan Deposit (January 2020) Environmental Designations Map



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.

3.9 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.

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.

3.10 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.

3.11 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 concurrently with the pre-application consultation for planning.

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'. This would reduce the risk of flooding and 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.

3.12 Design Brief and Design Response

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 the Illustrative Site Layout Plan 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:

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

4 Conclusion

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.

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.