

# Document Pack



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**THURSDAY, 3 JANUARY 2019**

**TO: ALL MEMBERS OF THE PLANNING COMMITTEE**

I HEREBY SUMMON YOU TO ATTEND A MEETING OF THE **PLANNING COMMITTEE** WHICH WILL BE HELD IN THE **CHAMBER, COUNTY HALL, CARMARTHEN, AT 1.00 PM ON THURSDAY, 10TH JANUARY, 2019** FOR THE TRANSACTION OF THE BUSINESS OUTLINED ON THE ATTACHED AGENDA

*Mark James* CBE

**CHIEF EXECUTIVE**



PLEASE RECYCLE

<b>Democratic Officer:</b>	<b>Martin S. Davies</b>
<b>Telephone (direct line):</b>	<b>01267 224059</b>
<b>E-Mail:</b>	<b>MSDavies@carmarthenshire.gov.uk</b>
<b>Ref:</b>	<b>AD016-001</b>

# PLANNING COMMITTEE

## 20 MEMBERS

### PLAID CYMRU GROUP - 10 MEMBERS

- |     |                                      |  |
|-----|--------------------------------------|--|
| 1.  | <b>Councillor Mansel Charles</b>     | Member of Llanegwad Community Council    |
| 2.  | <b>Councillor Tyssul Evans</b>       | Member of Llangyndeyrn Community Council |
| 3.  | <b>Councillor Jeanette Gilasbey</b>  | Member of Kidwelly Town Council          |
| 4.  | <b>Councillor Ken Howell</b>         |  |
| 5.  | <b>Councillor Carys Jones</b>        |  |
| 6.  | <b>Councillor Alun Lenny (Chair)</b> | Member of Carmarthen Town Council        |
| 7.  | <b>Councillor Jean Lewis</b>         |  |
| 8.  | <b>Councillor Dorian Phillips</b>    |  |
| 9.  | <b>Councillor Gareth Thomas</b>      |  |
| 10. | <b>Councillor Eirwyn Williams</b>    |  |

### LABOUR GROUP - 6 MEMBERS

- |    |                                 |  |
|----|---------------------------------|--|
| 1. | <b>Councillor Penny Edwards</b> |  |
| 2. | <b>Councillor John James</b>    | Member of Pembrey & Burry Port Community Council |
| 3. | <b>Councillor Dot Jones</b>     | Member of Llannon Community Council              |
| 4. | <b>Councillor Ken Lloyd</b>     | Member of Carmarthen Town Council                |
| 5. | <b>Councillor Kevin Madge</b>   | Member of Cwmamman Town Council                  |
| 6. | <b>Councillor John Prosser</b>  |  |

### INDEPENDENT GROUP - 4 MEMBERS

- |    |  |                                      |
|----|--|--------------------------------------|
| 1. | <b>Councillor Sue Allen</b>                | Member of Whitland Town Council      |
| 2. | <b>Councillor Ieuan Davies</b>             |                                      |
| 3. | <b>Councillor Joseph Davies</b>            |                                      |
| 4. | <b>Councillor Irfon Jones (Vice-Chair)</b> | Member of Bronwydd Community Council |

**NO SUBSTITUTES ARE ALLOWED AT MEETINGS OF THIS COMMITTEE**

# A G E N D A

1. APOLOGIES FOR ABSENCE.
2. DECLARATIONS OF PERSONAL INTERESTS.
3. S/37933 - SINGLE STOREY REAR EXTENSION WITH A BALCONY TO THE FIRST FLOOR AT 105 PENTRE NICKLAUS VILLAGE, LLANELLI, SA15 2DF. 5 - 10
4. AREA SOUTH - DETERMINATION OF PLANNING APPLICATIONS. 11 - 104

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<b>Application No</b>	<b>S/37933</b>
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<b>Application Type</b>	Full Planning
<b>Proposal &amp; Location</b>	SINGLE STOREY REAR EXTENSION WITH A BALCONY TO THE FIRST FLOOR AT 105 PENTRE NICKLAUS VILLAGE, LLANELLI, SA15 2DF

<b>Applicant(s)</b>	MR MATHEW WILLIAMS, 71 GLENALLA ROAD, LLANELLI, SA15 1EF
<b>Case Officer</b>	Robert Davies
<b>Ward</b>	Glan Y Mor
<b>Date of validation</b>	17/10/2018

## CONSULTATIONS

**Llanelli Town Council** – Whilst it is understood that Llanelli Town Council did not originally object to the proposal at their meeting, in their response they have objected to the application on the basis that it would adversely affect the amenity of neighbouring properties and is thus contrary to Policies GP1 and GP6 of the LDP. The Town Council welcomes the request for a site visit by the Planning Committee.

**Local Members** – County Councillor L Roberts opines that the proposal will overlook the neighbouring property and will compromise the privacy of 106 Pentre Nicklaus. Councillor Roberts requests that the Planning Committee undertake a site visit prior to determining the application.

County Councillor J Prosser, who is a Member of the Planning Committee, also requests that the Planning Committee undertake a site visit prior to determining the application.

**Dwr Cymru/Welsh Water** – No objection.

**Neighbours/Public** – 2no. neighbouring properties were notified of the application. To date four letters of representation has been received raising the following objections:-

- Loss of privacy as a result of overlooking from the proposed balcony;
- Loss of morning sunlight, which will also result in a damper garden;
- Loss of views of the golf course to the east;

- The increased footprint of the property will exacerbate existing drainage problems in the garden;
- Devaluation of property;
- Request that the Planning Committee undertake a site visit prior to determining the application.

## **RELEVANT PLANNING HISTORY**

The following previous applications have been received on the application site:-

S/12435	Proposed amendments to previously approved application ref. LL/02037 dated 19.09.02 to include change of house types, plot re-orientation, plot and highway re-alignment and amended slab levels Full planning permission	20 April 2006
LL/02037	Residential – 176 houses Full planning permission	19 September 2002
S/03042	Residential Outline planning permission	24 May 2001

## **APPRAISAL**

### **THE SITE**

The application site consists of a modern detached dwelling located on the Pentre Nicklaus Village housing development in Machynys, Llanelli. The property itself occupies a corner plot on the estate.

### **THE PROPOSAL**

The application seeks full planning permission to construct a single storey flat roof rear extension with balcony above. The proposed extension is 8.4 metres in width, 4 metres in depth and is 2.8m high to the top of the flat roof. The proposal will provide additional kitchen and living area at ground floor, with a balcony above accessed from the first floor study via a new set of sliding doors. The proposed balcony is surrounded by a glazed balustrade, whilst a 1.8m high obscure glazed screen is proposed on the western elevation of the balcony.

### **PLANNING POLICY**

The area is covered by the Carmarthenshire Local Development Plan that was formally adopted in December 2014. The application site is located within the defined settlement limits of Llanelli as delineated within the Adopted LDP and the key relevant policies are as follows:-

Policy GP1 of the LDP promotes sustainability and high quality design, and seeks to ensure that development 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. It also seeks to ensure that proposals do not have a significant impact on the amenity of adjacent properties.

Policy GP6 of the LDP relates specifically to domestic extension proposals and states that extensions should be subordinate in scale and external appearance in comparison to the host dwelling; should not adversely affect the amenities of neighbouring properties; and should allow for sufficient garden amenity space to remain.

### **THIRD PARTY REPRESENTATIONS**

As aforementioned in this report, three neighbouring properties have objected to the application along with another member of the public. Both Local County Councillors have also provided comments whilst the Town Council has also raised objections. The material reasons for concern and objection raised will now be addressed individually as part of this appraisal, however as Members will be aware, there is no legal right to a view whilst devaluation of property is also not a material planning consideration.

In terms of overlooking from the proposed balcony, as aforementioned the proposal makes provision for a 1.8m high obscure glazed screen on the western elevation facing no.106 Pentre Nicklaus. This will ensure that users of the balcony cannot directly overlook the objector's property from an elevated position. In addition to this, the existing dwelling is orientated in a south easterly direction ensuring that views are focussed away from the objector's dwelling.

With regard to no. 97, this property which has its own rear balcony is located on the opposite side of the road from the application property and therefore it is considered that there is no immediate effect upon the privacy and amenity of that property. In terms of no. 104a, views from the proposed balcony will primarily look out at the pine end and front of this property and therefore will not result in any adverse amenity implications.

With regards to loss of sunlight, the proposed extension is only single storey and is not considered excessive in scale. The proposal is also offset away from the boundary with the objector's property. Therefore it is not considered that the proposal will adversely affect the amount of sunlight entering no.106 Pentre Nicklaus. It is worth noting that an extension of the scale currently proposed, with the exception of the balcony, would not normally require planning permission, however Permitted Development Rights were removed on this housing development.

Finally in terms of drainage, it is considered that the proposed development will not exacerbate any existing drainage problems in the rear garden area of no.106 Pentre Nicklaus. Sufficient garden space remains at the application property to ensure that adequate drainage systems can be put in place, and this will be safeguarded at any subsequent Building Regulations stage. It is worth noting that the land falls away from the rear of the dwelling towards the south east corner of the garden.

### **CONCLUSION**

The proposed extension and balcony are considered acceptable in size, scale and design terms in keeping with the property itself and immediate environs. The proposal

will not in the LPA's opinion result in any adverse amenity issues whilst it is considered that the issues of concern and objection raised have adequately been addressed as part of the above appraisal. Sufficient rear garden amenity space will remain post development.

On balance after careful examination of the site and its surrounding environs in the context of this application, together with the representations received to date it is considered that the proposal does accord with the Policies contained within the Adopted LDP. As such the application is put forward with a recommendation for approval.

## **RECOMMENDATION – APPROVAL**

### **CONDITIONS**

- 1 The development hereby approved shall be commenced before the expiration of five years from the date of this permission.
- 2 The development hereby permitted shall be carried out strictly in accordance with the following schedule of plans received on the 15th October, 2018:-
  - Block and location plans (001) 1:200; 1:500; 1:1250 @ A3;
  - Existing floor plans (101) 1:100 @ A3;
  - Proposed floor plans (102A) 1:100 @ A3.
- 3 Prior to the commencement of development full constructional detail inclusive of scaled drawings (1:20) of the proposed 1.8m high obscure glazed screen on the western side of balcony as shown on the approved drawings shall be submitted to and approved in writing by the Local Planning Authority. The approved screen should then be constructed in strict accordance with the approved detail prior to the beneficial use of the balcony.

### **REASONS**

- 1 Required to be imposed pursuant to Section 91 of the Town and Country Planning Act 1990.
- 2 In the interest of visual amenity.
- 3 In order to preserve residential amenity.

### **REASONS FOR GRANTING PLANNING PERMISSION**

The decision to grant planning permission has been taken in accordance with Section 38 of the Planning and Compulsory Purchase Act 2004, which requires that, in determining a planning application the determination must be in accordance with the Development Plan unless material considerations indicate otherwise.



- It is considered that the proposal complies with Policy GP1 of the LDP in that it is appropriate in terms of scale and design, and will not cause unacceptable loss of amenity to neighbouring uses.
- It is considered that the proposed development complies with Policy GP6 of the LDP in that it is appropriate in terms of scale and design, sufficient amenity/garden space remains, and it shall not adversely affect the amenities of the occupiers of the neighbouring properties.

## NOTES

- 1 Comments and guidance received from consultees relating to this application, including any other permissions or consents required, are available on the Authority's website.
- 2 Please note that this consent is specific to the plans and particulars approved as part of the application. Any departure from the approved plans will constitute unauthorised development and may be liable to enforcement action. You (or any subsequent developer) should advise the Council of any actual or proposed variations from the approved plans immediately so that you can be advised how to best resolve the matter.

In addition, any Conditions which the Council has imposed on this consent will be listed above and should be read carefully. It is your (or any subsequent developers') responsibility to ensure that the terms of all Conditions are met in full at the appropriate time (as outlined in the specific condition).

The commencement of development without firstly meeting in full the terms of any Conditions which require the submission of details prior to the commencement of development will constitute unauthorised development. This will necessitate the submission of a further application to retain the unauthorised development and may render you liable to formal enforcement action.

Failure on the part of the developer to observe the requirements of any other Conditions could result in the Council pursuing formal enforcement action in the form of a Breach of Condition Notice.

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*Ardal Del/  
Area South*

**ADRODDIAD PENNAETH  
CYNLLUNIO,  
CYFARWYDDIAETH YR  
AMGYLCHEDD**

**REPORT OF THE  
HEAD OF PLANNING,  
DIRECTORATE OF ENVIRONMENT**

**AR GYFER PWYLLGOR CYNLLUNIO  
CYNGOR SIR CAERFYRDDIN**

**TO CARMARTHENSHIRE COUNTY  
COUNCIL'S PLANNING COMMITTEE**

**AR 10 IONAWR 2019  
ON 10 JANUARY 2019**

**I'W BENDERFYNU/  
FOR DECISION**



**Mewn perthynas â cheisiadau y mae gan y Cyngor ddiddordeb ynddynt un ai fel ymgeisydd/asiant neu fel perchennog tir neu eiddo, atgoffir yr Aelodau fod yna rhaid iddynt anwybyddu'r agwedd hon, gan ystyried ceisiadau o'r fath a phenderfynu yn eu cylch ar sail rhinweddau'r ceisiadau cynllunio yn unig. Ni ddylid ystyried swyddogaeth y Cyngor fel perchennog tir, na materion cysylltiedig, wrth benderfynu ynghylch ceisiadau cynllunio o'r fath.**

**In relation to those applications which are identified as one in which the Council has an interest either as applicant/agent or in terms of land or property ownership, Members are reminded that they must set aside this aspect, and confine their consideration and determination of such applications exclusively to the merits of the planning issues arising. The Council's land owning function, or other interests in the matter, must not be taken into account when determining such planning applications.**

<b>COMMITTEE:</b>	<b>PLANNING COMMITTEE</b>
<b>DATE:</b>	<b>10 JANUARY 2019</b>
<b>REPORT OF:</b>	<b>HEAD OF PLANNING</b>

**INDEX - AREA SOUTH**

<b>REF.</b>	<b>APPLICATIONS RECOMMENDED FOR APPROVAL</b>
<b>S/36948</b>	<p><b>Wellness and Life Science Development including: Community Health Hub (Institute of Life Science, Wellness Education Centre and Clinical Delivery Centre) of up to 16,500 sqm (Use Classes; D1 Non-Residential Institution, B1 (B) Business Research and Development, and C2 Residential Institution). Life Science Business Centre (office space in the Research and Development Sector) of up to 10,000 sqm (Use Class B1 (B) Business Research and Development and B2 Light Industrial). Wellness Hub (visitor centre and corporate, community, leisure and sporting facilities) of up to 11,000 sqm (Use Class D2 Assembly and Leisure). Assisted living (nursing care, residential care, extra care housing and clinical rehabilitation facilities) of up to 370 beds/units and 7,500 sqm (Use Classes; C2 Residential Institution, C3 (A) and C3 (B) Residential). Associated outdoor recreation area, leisure and therapy spaces; landscaping and public realm; energy and utilities infrastructure; access and parking on land at Delta Lakes, Llanelli at Llanelli Wellness And Life Science Village, Land At Delta Lakes, Llanelli</b></p>

**APPLICATIONS RECOMMENDED FOR APPROVAL**

<b>Application No</b>	<b>S/36948</b>
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<b>Application Type</b>	Outline
<b>Proposal &amp; Location</b>	<p>WELLNESS AND LIFE SCIENCE DEVELOPMENT INCLUDING: COMMUNITY HEALTH HUB (INSTITUTE OF LIFE SCIENCE, WELLNESS EDUCATION CENTRE AND CLINICAL DELIVERY CENTRE) OF UP TO 16,500 SQM (USE CLASSES; D1 NON-RESIDENTIAL INSTITUTION, B1 (B) BUSINESS RESEARCH AND DEVELOPMENT, AND C2 RESIDENTIAL INSTITUTION). LIFE SCIENCE BUSINESS CENTRE (OFFICE SPACE IN THE RESEARCH AND DEVELOPMENT SECTOR) OF UP TO 10,000 SQM (USE CLASS B1 (B) BUSINESS RESEARCH AND DEVELOPMENT AND B2 LIGHT INDUSTRIAL). WELLNESS HUB (VISITOR CENTRE AND CORPORATE, COMMUNITY, LEISURE AND SPORTING FACILITIES) OF UP TO 11,000 SQM (USE CLASS D2 ASSEMBLY AND LEISURE). ASSISTED LIVING (NURSING CARE, RESIDENTIAL CARE, EXTRA CARE HOUSING AND CLINICAL REHABILITATION FACILITIES) OF UP TO 370 BEDS/UNITS AND 7,500 SQM (USE CLASSES; C2 RESIDENTIAL INSTITUTION, C3 (A) AND C3 (B) RESIDENTIAL). ASSOCIATED OUTDOOR RECREATION AREA, LEISURE AND THERAPY SPACES; LANDSCAPING AND PUBLIC REALM; ENERGY AND UTILITIES INFRASTRUCTURE; ACCESS AND PARKING ON LAND AT DELTA LAKES, LLANELLI AT LLANELLI WELLNESS AND LIFE SCIENCE VILLAGE, LAND AT DELTA LAKES, LLANELLI</p>

<b>Applicant(s)</b>	CARMARTHENSHIRE COUNTY COUNCIL, FAO STEFFAN JENKINS, C/O AGENT
<b>Agent</b>	ARUP - MR LIAM PAGE, 4 PIERHEAD STREET, CAPITAL WATERSIDE, CARDIFF, CF10 4QP
<b>Case Officer</b>	Robert Davies
<b>Ward</b>	Glan Y Mor
<b>Date of validation</b>	15/03/2018

## CONSULTATIONS

**Head of Highways and Transport** – No objection subject to conditions and financial contributions for offsite highway works and improvements.

**Public Protection – Air Quality –** No objection. Advise that it is not considered that the traffic volumes associated with the proposed development will have a significant adverse impact on air quality, at any particular location, as regulated under the Environment Act 1995 and in relation to the requirements of Local Air Quality Management. However, it is suggested that any identified junction improvements that reduce waiting times, and therefore engine idling times, be conditioned.

It is also suggested that the provision of electric vehicle charging points and an overall travel plan (once more detailed information about specific buildings and their use is known) be developed to work towards general air quality improvement as part of the development.

**Public Protection - Noise –** No objection. Advise that the Environmental Statement concluded that the proposed development will meet the criteria of TAN 11 and BS8233:2014 for daytime and night time internal noise levels with appropriate mitigation measures recommended.

Should planning permission be granted, the Environmental Health Section would recommend that specific noise related conditions are imposed on the decision.

**Public Protection - Contaminated Land –** No objection. Has considered the information submitted with the application, and confirmed that based on the information presented to date along with the identified former industrial activities at and in the surrounding area, recommend the imposition of the standard contaminated land condition on any planning permission granted. The condition sets out the relevant stages to be addressed as part of a ground investigation risk assessment for each phase of the proposed development.

**Head of Housing –** Is fully supportive of the development from a housing perspective. The assisted living housing options will be hugely beneficial in meeting future housing need.

**Head of Leisure (Parks) –** Is fully supportive of the development from a leisure perspective. There is a requirement for a replacement leisure centre in Llanelli as the existing facility is way past its life expectancy and no longer efficient to operate or maintain. The Wellness Hub (new leisure centre) forms an integral part of the proposed Wellness Village.

**Llanelli Town Council –** No response received to date.

**Local Members –** County Councillor J Prosser supports the application. County Councillor L Roberts has not responded to date.

**Public Rights of Way Officer –** No objection. Advise that the application site is crossed by two Public Rights of Way footpaths.

If the application is approved, reference should be made to the applicant/developer to the requirement not to obstruct or encroach upon the footpaths at any time.

Any alterations to the surface of the footpath would require prior approval from the authority.

**Land Drainage –** No objection. Has considered the surface water management strategy that will form the basis for further design, and confirmed that infiltration options on site will be limited by contaminated ground conditions. A suitable SUDS type of drainage will be required for each phase of the development to manage the water quality of the surface water run-off.



**Natural Resources Wales (NRW)** – Has responded requesting the imposition of a number of conditions relating to contaminated land/geoscience, pollution prevention and landscaping.

In terms of drainage, NRW refer to the consultation response from Dwr Cymru/Welsh Water and draw reference to the requirements of the CBEEMS MoU.

NRW is currently in the process of considering the revised flood modelling and Flood Consequence Assessment undertaken. NRW is also currently considering additional ecology survey and the Local Planning Authority's Appropriate Assessment in relation to protected sites and species.

**Dwr Cymru/Welsh Water** – No objection subject to the imposition of conditions on any planning permission granted.

**Dyfed Archaeological Trust** – No objection subject to a condition requiring a written Scheme of Investigation.

**Cadw** – No objection. Has confirmed that there are no scheduled monuments or registered historic parks and gardens within the vicinity of the proposed development.

**Network Rail** – No response received to date.

**National Grid** – No response received to date.

**The Coal Authority** – No objection. Advise that parts of the site fall within the defined Development High Risk Area. The Coal Authority records indicate that parts of the site are likely to have been subject to historic unrecorded underground coal mining at shallow depth associated with a thick coal outcrop and that three recorded mine entries (adits) are present within the planning boundary.

The Geo-technical and Geo-environmental desk based report submitted with the application confirms that the physical investigation of the coal mining legacy features referred to will be required. Consequently, The Coal Authority has no objections to this planning application subject to the imposition of an appropriate planning condition to secure the site investigations referred to and any necessary remedial measures.

**City and County of Swansea Council** - No response received to date.

**Neighbours/Public** – The application was originally advertised by virtue of both press and 12 site notices. A re-consultation exercise to this effect was undertaken following the submission of additional information. To date two letters of representation have been received, one objecting and the other in support.

The letter of objection received states the following reasons:-

- It is disingenuous to suggest this site is highly accessible by road. The proposed site is less than 2 miles from a major transport bottleneck. Covered in the council's 2017 Carmarthen and Llanelli AQMA's Action Plan Report, the A484 which is a key route for any visitor to the proposed site from Burry Port, Pembrey and onto Carmarthen, as

described in the planning application, cannot be categorised as being a fast onward connection and should not be considered in any way appropriate.

- The planning application has also indicated why public transport is not a viable alternative.
- Since the A484 in Sandy is already at breaking point and unable to sustain any further increase in vehicle traffic, in the interests of highway safety, this planning application should not be approved.

The letter of support opines that the proposed development is a really good idea, Llanelli needs updating along with the economy, anything to help that should go ahead instantly.

## **RELEVANT PLANNING HISTORY**

The following previous applications have been received on the application site:-

S/35410	Variation of conditions 3 and 14 (surface water drainage and archaeological work) Variation of planning condition granted	18 May 2017
S/35409	Discharge of conditions 4, 5, and 6 of S/26070 Discharge of planning condition granted	12 May 2017
S/35394	Variation of condition 10 (Buffer Zone Management) and 11 (Japanese Knotweed) Variation of planning condition granted	18 May 2017
S/35087	Discharge of condition 8 (Water Vole Survey Report) of planning permission S/34497 Discharge of planning condition granted	28 February 2017
S/34940	Discharge of condition 7 of S/34497 Discharge of planning condition granted	03 February 2017
S/34515	Construction of a new 1.1km below ground trunk storm water sewer, plus 7 no. launch and reception shafts between the junction of Station Road and Lakefield Road and the DCWW Northumberland Sewage Pumping Station (SPS) site. Construction of a new below ground storm water sewer spur off the proposed Station Road trunk sewer for connection from the future Asda Phase 2 Scheme, plus associated at ground level manhole covers. Storm sewer to be located approximately between Shaft 2 Station Road and recreational land to the north of Ann Street approximately. Construction of a new below ground storm water sewer spur off the proposed Station Road trunk sewer for connection from the future Emma Street Scheme, plus associated at ground level manhole covers. Storm sewer to be located	

approximately between the Shaft 3 and the Home Bargains Car Park. Construction of new access spur to Shaft 5 in Ysgol Penrhos School site. Improvements works at the existing DCWW Northumberland SPS, including the provision of a new storm water pumping station, associated access track and MCC kiosk. Construction of a new 160m below ground storm sewer outfall pipe between the Northumberland SPS and the proposed discharge outfall structure at the northern bank of the new River Dafen balancing pond.

CLOPUD approval 26 October 2016

S/34497	Proposed development of a storm water sewer outfall, plus associated engineering operations, to provide a suitable discharge point for the Station Road storm water sewer improvement scheme, into the new Dafen River balancing pond Full planning permission	03 November 2016
S/29706	Discharge of condition no. 9 of planning permission S/26070 Discharge of planning condition granted	21 March 2014
S/29705	Discharge of condition 7 of planning permission S/28446 Discharge of planning condition granted	21 March 2014
S/29090	Discharge of conditions 2, 3 and 4 of planning permission S/28446 Discharge of planning condition granted	18 December 2013
S/28979	Discharge of condition no 6 of planning permission S/28446 Discharge of planning condition granted	04 November 2013
S/28446	New foul pumping station and associated works Full planning permission	02 September 2013
S/26070	Enabling works, including new pumping station Full planning permission	14 June 2012
S/24048	Provision of hard and soft landscape on the roadside verges along the access to Delta Lakes, Llanelli and along the highway verges of the B4304 coastal link road Full planning permission	12 January 2011
S/18277	Construction of new office building Reserved Matters granted	01 July 2008

S/17160	Construction of new roundabout junction on the coastal link road (B4304) and the realignment of Pentre Nicklaus Avenue to meet the new roundabout Full planning permission	27 September 2007
S/16933	Section 73 application to vary condition no. 1 of outline planning permission ref. S/08375 granted on 7th February 2005 to extend the time period Variation of planning condition granted	27 September 2007
S/08375	Siting of business and industrial development (Use Classes B1 and B8) Outline planning permission	07 February 2005
S/00434	Hard and soft landscaping, footpaths, cycleway	13 February 1997
D5/17306	Hoarding Advertisement granted	04 January 1996
D5/17183	Temporary site access Full planning permission	12 October 1995
D5/16895	Proposed extension to Afon Dafen culvert at Machynys, Llanelli Full planning permission	27 April 1995
D5/16894	Business park - development within the meaning of Class B1 of the Use Classes Order Outline planning permission	27 April 1995
D5/16726	The construction of a new pumping station and associated buildings required to pump sewage flow to a new treatment facility to be located at Penybryn Farm, Bynea, Llanelli Full planning permission	02 February 1995
D5/16003	Land reclamation, highway infrastructure and drainage works Full planning permission	13 January 1994
D5/15860	Hard and soft landscaping works, comprising tree and shrub planting, paving, footpaths, car parking area Full planning permission	31 March 1994
D5/15458	Landscaping and construction of sculpture Full planning permission	08 July 1993
D5/15380	Decommission existing, part demolish & replace by additional storm water storage tanks & a	

pumping station to transfer the flows to new STW  
at Bynea  
Full planning permission 18 March 1993

D5/14950 Creation of a lake, Phase 1 highway infrastructure  
& car parking, landscaping, tree & shrub planting  
Full planning permission 31 March 1994

## **APPRAISAL**

**This is an application in which Carmarthenshire County Council has an interest in terms of being applicant.**

## **THE SITE**

The application site known as land at Delta Lakes, is located approximately 2km south of Llanelli town centre and can be accessed via an existing roundabout off the B4304 coastal link road at Machynys to the south of the site. The B4304 effectively forms the southern boundary of the application site and beyond which to the south lie relatively recent residential developments at Machynys West and Pentre Nicklaus, with the Machynys Golf Club located further to the south east. There are long standing pending planning applications for an Eco Park and further residential development on land to the south east of the site. The more traditional residential areas of south Llanelli are located to the north and east of the site

The Millennium Coastal Park, a significant recreation and tourist resource and key walking and cycling route (National Cycle Route & Wales Coastal Path) is located in close proximity to the south, whilst the intertidal area and sea body beyond comprises the Carmarthen Bay and Estuaries European Marine Site (CBEEMS). Three marine Natura 2000 sites together form the European Marine Site – Carmarthen Bay and Estuaries Special Area of Conservation (SAC), Carmarthen Bay Special Protection Area (SPA) and Burry inlet SPA and Ramsar site.

The road to the east of the site is known as The Avenue and runs in a northerly direction linking the coastal link road via New Dock Road/Station Road with the town centre to the north. The main railway station is approximately 1km to the north of the site. Existing employment related uses including the Delta Lakes Enterprise Centre are located adjacent to the south eastern boundary of the application site and are accessed via The Avenue. On the opposite side of The Avenue lie a variety of uses including a doctor's surgery, Lidl supermarket store, a Brain Injury Rehabilitation Centre and existing housing. The site includes two Public Rights of Way which connect between The Avenue and extend through part of the application site.

The northern and western boundaries of the site are defined by Northumberland Road which connects The Avenue at the north east corner, with the B4304 link road to the south west. Northumberland pumping station, a strategic Dwr Cymru/Welsh Water sewerage asset is located beyond this road to the north. The former Draka Copperworks site is located further to the north, part of which now accommodates the new Pen Rhos primary school. A large industrial works is located to the north west of the site beyond a mature landscaped bund, and is accessed via the road that forms the western boundary of the application site.

The application site has a total site area of 23ha which includes the large standing water body known as the New Dafen River that occupies a relatively central position within the

site. Excluding the water body itself, the remaining 18.6ha consists of existing vacant brownfield land previously associated with the heavy industry and manufacturing that occupied the Llanelli coastline historically. The southern coastline of Llanelli is renowned for its docks and industrial history, which included a range of industries including brick works, clay mills, coal yards, tin plate works, saw mills, iron foundries and chemical works with supporting workers housing. The area had an extensive network of railways, tramways and docks.

The site was cleared over 20 years ago to facilitate and encourage commercial development with only a few remaining man made features including a historic dock wall. The B4304 coastal link road was constructed in the 1990's to improve connectivity and facilitate the wider regeneration of the area. A sluice gate at the western end of the New Dafen River dams the flow of water forming a permanent water body on the site. Beyond the sluice gate the water body flows into the estuary via the Lledi River. The Afon Dafen is largely culverted to the eastern side of the lake with the exception of one open element. An internal road network has been created within the site however this arrangement will need to be altered to optimise development potential, whilst other access points may be required into the site also. Some engineering works to raise levels to 6.9m AOD and a foul pumping station have recently been developed to the eastern part of the application site.

The site is largely flat, typically between 6.8m and 8.0m AOD, whilst made ground is anticipated across the whole site due to the site's historic uses. The geotechnical desk study indicates that the general ground conditions consist of made ground overlying relatively impermeable estuarine alluvium. There is a small area of mixed woodland to the north western area of the site whilst wetland vegetation is featured along most of the water's edge. Japanese knotweed is present on parts of the site.

A number of large Dwr Cymru/Welsh Water drainage sewers are located within and around the site, connecting into Northumberland PS to the north. A significant sewer which runs along the eastern and southern edges of the lake is known to have an easement of 16m in width, therefore limiting development potential in this area. There may however be potential to divert the route of this sewer or negotiate the extent of the easement.

The application site is one of a number of sites along the Llanelli coastline which is part of a joint venture economic regeneration initiative between Carmarthenshire County Council and Welsh Government.

## **THE PROPOSAL**

The application seeks outline planning permission with all matters reserved for the Llanelli Wellness and Life Science Village (LWLV), a development led by Carmarthenshire County Council, in partnership with Hywel Dda and Abertawe Bro Morgannwg University Health Boards, Swansea University and the private sector. The proposed scheme is a key project of the Swansea Bay City Region Deal.

The proposed development includes a number of buildings, facilities and services that would aim to improve people's quality of life, improve health and/or provide research opportunities within the health arena.

The LWLV proposals are shaped around the concept of integration, the advantages resulting from providing a range of facilities and services in one place, and the benefits of locating facilities within the community. The proposals are based on a vision to create a new

destination for wellbeing and leisure, delivering state-of-the-art sports and recreation facilities, promoting healthy and active lifestyles, and integrating facilities for healthcare, specialised care and later-life living at the heart of the community.

The Design and Access Statement (DAS) submitted with the application defines the main aim of the project as follows:-

*“The Llanelli Wellness and Life Science Village (LWLV) is a once in a generation opportunity to integrate primary care, specialist care, R&D, business development, education and wellness initiatives to deliver transformational social and economic benefits for the communities which it serves.”*

The DAS states that the main elements of the proposal are:-

- **Wellness Hub** - a major sports and leisure centre with a swimming pool, indoor diving centre and a range of high-quality sports and fitness facilities. The Hub will be the arrival point for the site with reception facilities, cafe and community spaces. This will be the largest building on site.
- **Community Health Hub** - a centre for community healthcare which also comprises space and facilities for business development, research, education and training.
- **Life Science Business Centre** - up to 10,000sqm space for business expansion and health related research.
- **Assisted Living and Rehabilitation facilities** – a range of residential accommodation for people with care and support needs including care homes, apartments and houses (both public and private sector), alongside associated rehabilitation and recovery facilities.
- **Sports Facilities** - a range of sports pitches with a pavilion and changing facilities.
- **Lakeside Landscape** - an attractive open space centred around the lake, offering high quality public realm, vibrant lakeside plaza, and naturalised areas of woodland, wetland and glades. Sport activities will be integrated in this area's unique landscape including water sport, outdoor gym, fitness trail and yoga. A feature boardwalk will allow users to get closer to the water's edge and meander through the reed's habitats. The Lakeside area leisure provides walking routes and connections to the Wales Coast Path and surrounding communities.

The proposed development is supported by a broader vision to provide a hotel, open market, affordable housing and an eco-park on neighbouring sites.

The masterplan drawing submitted with the application provides an indicative layout and scale parameters for the development. It is envisaged that the Village Hub (Buildings 1 & 3) forms the heart of the site, comprising the key public facilities and the strongest architectural presence. The area provides a strong response to the lakeside setting and an attractive welcome for visitors. The Wellness Hub and Community Health Hub sit either side of an attractive new plaza covered by a glazed canopy.

The Wellness Hub (Building 3) will be the largest building on site and along with the Community Health Hub (Building 1) will represent the landmark building. The scale and

massing of the Wellness Hub building is shaped by the need to create large interior spaces under a single roof. A height of up to 20m is required to allow diving facilities and shroud plant equipment but the building drops toward the assisted living to the east in order to reduce visual impact.

The Rehabilitation and Clinical Recovery Space (Building 8) indicatively wraps around to form the western half of a semi-private courtyard with the Community Health Hub (Building 1) which provides an attractive outlook for clinical spaces and opportunities for outdoor rehabilitation. The DAS states that there is potential to include green roofs and accessible roof gardens.

The main vehicular approach into the site from the existing roundabout on the B4304 coastal link road will be defined by the Life Science Business Centre (Building 2) to the west and a 350 space short stay car park to the eastern side of the approach.

The Assisted Living elements of the proposed development are located to both the eastern and western parts of the site. What is referred to as Assisted Living East (Buildings 4 & 5), is an area that sits between the lakeside and The Avenue, adjacent to the Village Hub. A gateway will be created at The Avenue, marking arrival to the site, with potential to enhance the public open spaces immediately to the north. The DAS explains that the layout is designed to respond to development across The Avenue, providing a strong frontage which is set back from the road edge behind a wide landscape strip. The form steps down from the lakeside to the road, reducing dominance over facing properties. The buildings will be detailed to provide an attractive living environment which feels appropriately residential and avoids a clinical or institutional atmosphere. Materials will be chosen to reflect both the neighbouring Wellness Hub and the existing developments around The Avenue.

The DAS explains that Assisted Living West area (Buildings 6 & 7) creates a discrete private sector-led development which is well integrated with the wider site. It includes a range of residential accommodation for service users reflecting their level of independence and health needs and allowing for various family arrangements.

The indicative layout shows a mix of apartments and houses, creating a transition in scale between the larger Village Hub buildings and the existing houses to the south. The buildings have a strong street presence helping to provide enclosure.

The Assisted Living west area is served by a number of internal streets. The hard and soft landscape of these areas will create a slow traffic environment with high quality and textured paving at key locations.

The landscape strategy states that the external environment is considered to be a vital component of the proposed development. The proposed design and layout of the development are shaped by the concept of a 'Wellbeing' environment, rooted in the idea that people's health is influenced by the environment surrounding them. The landscape strategy seeks to achieve an attractive setting for the scheme, creating a high quality restorative environment. Opportunities for informal recreation are maximised with footpaths and cycleways extended throughout the development and connecting to the coast and routes into town.

Considering this emphasis on the landscape it is unsurprising therefore that the DAS places a lot of emphasis upon the lakeside. It is stated that maximising the potential of the lake is



fundamental to the design of the scheme. It is both an opportunity for recreational use and a haven for wildlife.

To the north of the Wellness Hub it is explained that the public realm will create an attractive urban edge to the waterside environment. This will include a hardscape area which forms a focal point on the southern side of the lake. This area will form a 'spill out' space for activities within the Wellness Hub, potentially including a café terrace. A more formal paved footpath will provide the main route for pedestrians connecting the village hub area with the western site entrance, linking into the Millennium Coastal Path via a new road crossing, forming a key gateway location into the site. A 16m easement with the combined sewer exists and acts as a constraint affecting the developable area to the southern side of the lake, however its route could potentially be re-aligned.

The southern edge of the lake will also include ecological landscape terraces to create a softer and naturalistic edge to the lake, allowing closer access to the water's edge and creating a seating and viewing area. These terraces will also provide important enhancements to habitats and biodiversity.

The southern lakeside public realm is linked to the northern side of the lake by a footbridge.

The Lakeside North area will be kept largely undeveloped with enhanced accessibility and leisure amenity while improving environmental quality and creating new habitats.

The indicative layout aids legible movement through the site by aligning key uses to the pontoon bridge route. The northern area of the site provides 150 long-stay car parking and coach drop-off facilities.

New outdoor sports pitches will be provided, complementing the indoor facilities only 250m away across the lake. There is potential to include facilities and access to the water for low-impact water sports, increasing the amenity of the site.

The pavilion building (Building 9) houses sports changing facilities and equipment stores on the ground floor, hospitality and events space on the upper storey and opportunities for a roof terrace overlooking the lake. The building will use natural materials and a green roof to help embed the structure within the landscape. There is opportunity to include small cabins (Buildings 10) within the wooded areas of the site providing health and wellbeing services or sports and fitness classes.

The southern boundary of the site with the B4304 will be softly screened with a low bunds and enhanced highway edge planting, offering filtered views into the site from the road and helping to screen views of traffic and noise from within the site.

The submission states that the development will have an ethos which promotes sustainable modes of travel and active travel above the use of private vehicles. The DAS states that the resulting site layout includes hierarchy of movement, promoting walking and cycling at the top, followed by access by public transport, and finally use of private cars.

The masterplan drawing indicatively indicates five vehicular access points into the development, with numerous other pedestrian and cycle entry and exit points.

General visitor and staff parking will be consolidated into shared short and long-stay facilities with additional service spaces adjacent to each facility and residents' parking at each

assisted living sites. The Wellness Hub, Community Health Hub and Life Science Business Centre will have servicing areas away from the main pedestrian and vehicle routes. Emergency access to all buildings will be possible from the main vehicle access routes.

There is a need to raise the development areas by around 0.6m to protect development areas from underlying contaminated land, whilst the most heavily contaminated area of the site is to the north of the lake, where limited buildings are proposed. There is a need to relocate an existing Public Right of Way to the east of the site as part of the proposed development.

The planning submission indicates that the LWLV would be constructed over a period of five years in a number of phases.

Enabling works - Site enabling works includes site remediation (if required), the establishment of site works compounds, earthworks, creation of access routes and establishment of services (utilities).

Phase 1 - Wellness hub, health hub, short stay car park, southern lakeside path, bridge crossing over lake, lakeside pavilion and long stay car park.

Phase 2 - Assisted living, care home, recreational space north of the lake, i.e. woodland glade therapy pods, enhanced woodland.

Phase 3 - Business centre.

Phase 4 - Neuro village, rehabilitation centre.

The outline planning application itself was originally accompanied by the following supporting information:-

- Site Location Plan
- Illustrative Masterplan and Building Dimensions
- Planning Statement
- Design and Access Statement
- Pre-Application Consultation Report and Notifications
- Geotechnical and Geo Environmental Desk Study
- Drainage Strategy
- Flood Consequence Assessment
- Environmental Statement and ES Non-Technical Summary which has been informed by additional survey work to address the following topics in detail:-

- 1 Traffic
- 2 Noise and Vibration
- 3 Air Quality
- 4 Water Resources
- 5 Ground Conditions
- 6 Biodiversity
- 7 Archaeology and Cultural Heritage
- 8 Landscape and Visual Assessment
- 9 Socioeconomics
- 10 Health and Wellbeing
- 11 Climate Change

## 12 Cumulative Effects

During the course of the planning application process the following additional supporting information was received:-

- Environmental Statement Addendum informed by the following:-
  - Bat Survey Report;
  - Wintering Birds Survey;
  - Breeding Birds Survey;
  - Otter Conservation Strategy;
  - Water Vole Method Statement;
  - Statement to inform Appropriate Assessment;
  - Revised Drainage Strategy informed by Hydraulic Modelling;
  - Revised Flood Consequence Assessment informed by Flood Modelling;
  - Revised Transport Assessment.
- Hydraulic Modelling Report by Dwr Cymru/Welsh Water;
- Phasing plan drawing.

### **BACKGROUND INFORMATION REGARDING THE SWANSEA BAY CITY DEAL**

Carmarthenshire is one of four local authority areas that form the Swansea Bay City Region.

The City Region has been successful in securing a £1.3 billion 'City Deal'. This investment, being funded by the UK and Welsh Ministers and the private sector aims to address the integrated universal themes and challenges of energy, health and well-being and economic acceleration by harnessing the transformational power of digital networks and the asset base of Swansea Bay. The Wellness and Life Science Village is a named project within the Deal.

In May 2016, an initial project conception report was prepared and submitted to the Welsh Ministers outlining the vision and objectives for development of the site for a wellness and life science village. The vision for the project was set as *'An exemplar public / private partnership that integrates primary care, rehabilitation services, research, business, education and leisure initiatives, providing a seamless "wellbeing" services for communities of South and West Wales'*.

Since the preparation of the initial report for the LWLV, the various components have been developed further in collaboration with investment partners and CCC.

The Swansea Bay City Deal is an Economic Strategy 2013-2030 whereby the LWLV is one of eleven Swansea Bay City Deal projects with a cumulative value of £1.3 Billion.

LWLV is one of three Carmarthenshire projects, the others being Yr Egin (creative industry) and a skills and talent initiative which transcends all the projects.

The village itself will see in excess of £200 million being invested in the area, with funding derived from the public and private sectors.

## **PLANNING POLICY**

### **Local Planning Policy Context**

The Planning Policy framework for Carmarthenshire consists of the Adopted Carmarthenshire Local Development Plan, 2014 (LDP).

Llanelli (including Llangennech) is identified as one of 3 Growth Areas within the LDP. The LDP Spatial Hierarchy acknowledges the strategic contribution of Llanelli (including Llangennech), with its identification as Growth Area reflective of its role and function on a local and regional scale. Llanelli's regional or sub regional status is recognised through the Wales Spatial Plan. In terms of the description for Llanelli set out in Appendix 1 of the LDP, it is stated that "future opportunities include the holistic regeneration of the town centre and waterfront, thus enabling the town to fulfil its potential as a modern and vibrant destination that drives socio-economic improvements and enhances accessibility to homes, services and employment across the South East of Carmarthenshire and beyond."

The LDP makes reference to the South Llanelli Strategic Zone which is identified as LDP Strategic Site 3 under LDP Policy SP4. This Zone is comprised of the following individual sites each contributing to the regeneration aspirations of South Llanelli: Delta Lakes; Machynys; The Avenue; North Dock and Old Castle Works. The delivery of this Strategic Site is of central importance to the realisation of the Plan's vision and strategic objectives. Whilst the North Dock and Machynys areas have a demonstrable record of delivery, the potential multi sectoral contribution of the Delta Lakes site has yet to be unlocked.

The application site is located partly within and partly outside the defined settlement limits of Llanelli as delineated within the Adopted LDP. The southern side and eastern sides of the application site are located within defined settlement limits, whilst the lake itself and land to the northern side of the lake are located outside limits.

The majority of the application site area is allocated for mixed use development (GA2/MU9) and referred to under Policy EMP5 of the LDP. The accompanying text to this policy states there is a "Focus on employment uses, maximising the environmental quality and setting of the site. Potential uses include health care provision. No residential allowance is made".

The eastern portion of the application site area is allocated for housing (GA2/H15) and referred to under Policy H1.

In respect of the applications policy context reference is drawn to the following Strategic and Specific planning policies: -

Policy SP1 of the LDP promotes environmentally sustainable proposals and encourages the efficient use of vacant, underused or previously developed land.

Policy SP2 of the LDP supports proposals which respond to, are resilient to and adapt to minimise for the causes and impacts of climate change. Proposals for development which are located within areas at risk from flooding will be resisted unless they accord with the provisions of TAN15.

Policy SP3 of the LDP refers to the settlement framework and states that provision for growth and development will be at sustainable locations in accordance with the LSP's settlement framework. In this respect Llanelli is identified as a Growth Area.

Policy SP4 of the LDP refers to Strategic Sites and as aforementioned Delta Lakes is identified as one such site in the South Llanelli Strategic Zone.

Policy SP5 of the LDP ensures enough housing land is allocated in accordance with the settlement framework.

Policy SP7 of the LDP refers to employment land allocations whereby Delta Lakes is allocated for 9.78 hectares of B1 business use.

Policy SP9 of the LDP promotes the provision of an efficient, effective, safe and sustainable integrated transport system.

Policy SP11 of the LDP relates to renewable energy and energy efficiency and supports proposals which incorporate energy efficiency measures and energy production technologies.

Policy SP13 of the LDP states that development proposals should preserve or enhance the built and historic environment of the County, its cultural, townscape and landscape assets, and, where appropriate, their setting in accordance with national guidance and legislation.

Policy SP14 of the LDP states that development should reflect the need to protect, and wherever possible enhance the County's natural environment in accordance with national guidance and legislation.

Policy SP15 of the LDP states that proposals for tourism related developments will be supported where they accord with the locational hierarchy set out within this policy, and are acceptable in terms of scale, type of development, siting and general impact.

Policy SP16 of the LDP supports the provision of new community facilities.

Policy SP17 of the LDP states that development will be directed to locations where adequate and appropriate infrastructure is available or can be readily available.

Policy SP18 of the LDP states that the interests of the Welsh language will be safeguarded and promoted.

Policy GP1 of the LDP promotes sustainability and high quality design, and seeks to ensure that development 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.

Policy GP2 of the LDP states that proposals within defined development limits will be permitted, subject to policies and proposals of the plan, national policies and other material planning considerations.

Policy GP3 of the LDP states that the Council, 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 development. The LPA has produced Supplementary Planning Guidance on planning obligations.

Policy GP4 of the LDP states that 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 the developer. Planning obligations and conditions will be used to ensure that new or improved facilities are provided to serve the new development.

Policy H1 of the LDP refers to Housing Allocations and as aforementioned the eastern part of the application site is identified for housing.

Policy EMP2 of the LDP states that new employment proposals within development limits will be permitted provided that there are no suitable employment allocations that could accommodate such a use, and provided that the proposals are of an appropriate scale and form compatible with its location and surrounding uses.

Policy EMP5 identifies Delta Lakes as a mixed use allocation (GA2/MU9) where there is a "Focus on employment uses, maximising the environmental quality and setting of the site. Potential uses include health care provision. No residential allowance is made".

Policy TR1 of the LDP states that proposals which do not restrict traffic movement and/or compromise the safety of the primary road network and core network will, where appropriate be supported.

Policy TR2 of the LDP states that developments which have the potential for significant trip generation, should be located in a manner consistent with the plan's objectives and in locations which are well served by public transport and are accessible by cycling and walking.

Policy TR3 of the LDP highlights the highway design and layout considerations of developments and states that 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.

Policy EQ1 of the LDP states that proposals affecting landscapes, townscapes buildings and sites or features of historic or archaeological interest will only be permitted where it preserves or enhances the built and historic environment.

Policy EQ4 of the LDP relates to biodiversity and states that 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 (i.e. NERC & Local BAP, and other sites protected under European or UK legislation), will not be permitted unless satisfactory mitigation is proposed, and where exceptional circumstances where the reasons for development outweigh the need to safeguard biodiversity and where alternative habitat provision can be made.

Policy EQ5 of the LDP states that proposals for development which would not adversely affect those features which contribute local distinctiveness/qualities of the County, and to the management and/or development of ecological networks (wildlife corridor networks), accessible green corridors and their continuity and integrity will be permitted.

Policy EP1 of the LDP states that proposals will be permitted where they do not lead to a deterioration of either the water environment and/or the quality of controlled waters. Proposals will, where appropriate, be expected to contribute towards improvements to water quality.

Policy EP2 of the LDP states that proposals should wherever possible seek to minimise the impacts of pollution. New developments will be required to demonstrate and satisfactorily address any issues in terms of air quality, water quality, light and noise pollution, and contaminated land.

Policy EP3 of the LDP requires proposals to demonstrate that the impact of surface water drainage, including the effectiveness of incorporating Sustainable Urban Drainage Systems (SUDS), has been fully investigated.

Policy EP5 of the LDP states that proposals for development in coastal locations will be permitted provided that they are necessary in that location and they do not increase the risk of erosion, flooding or land instability.

Policy EP6 of the LDP states that in areas where land instability is known, any development proposal must be accompanied by a scoping report to ascertain the nature of instability, and identify any remedial solutions required.

Policy REC1 of the LDP states that provision will be made to protect and wherever possible enhance accessibility to open space.

### **Supplementary Planning Guidance**

There are a number of Adopted SPG's relevant to the consideration of this planning application including:-

- Archaeology and Development;
- Nature Conservation and Biodiversity;
- Place Making and Design;
- Planning Obligations;
- Welsh Language;
- Leisure and Open Space – Requirements for New Developments;
- South Llanelli Planning and Development Brief.

The South Llanelli Planning and Development Brief has been prepared as SPG to guide the consideration and determination of development proposals for the South Llanelli strategic zone. It provides further guidance, and where applicable elaborates, on the policies and proposals of the LDP by providing additional clarity to assist developers in understanding the core requirements and considerations. Particular reference can be given to Section 5 of the SPG (Development Framework and Land Uses). This Framework utilises the opportunities provided by the area's outstanding environmental quality along with its high levels of spatial sustainability and strategic importance in policy terms. It also acknowledges the known constraints.

Reference is made to the description of Delta Lakes (GA2/MU9) provided within the South Llanelli SPG which as follows. *“An area to work and recover - This mixed use allocation is focused upon employment/business development (B1/B8). Other related uses (e.g. healthcare /service sector – social and/or private health care) may also be considered*

*appropriate. A portion of the allocation (east of the Avenue) hosts the Brain Injury Trust Facility. The main Delta Lakes site itself represents an opportunity to deliver a high quality development where suitable uses (e.g. business/ light industrial and private healthcare) are fully integrated within a high quality setting. Delta Lakes is well serviced by highway links, infrastructural capacity (application for new pumping station) and boasts an attractive frontage (landscaping/gateway enhancement scheme). In areas impacted by the C1 flood zone designation, ancillary uses (of a non vulnerable nature) could be explored in accordance with the provisions of TAN 15”.*

## **National Planning Policy Context**

National Planning Policy is contained within the Wales Spatial Plan, which provides an overall strategic framework, together with Planning Policy Wales (PPW), originally published by the Welsh Assembly Government in March 2002 with the most recent edition published in December 2018. PPW is supplemented by a series of Technical Advice Notes (TANs).

‘People, Places, Futures, the Wales Spatial Plan’ was updated in 2008. Llanelli is identified as a Primary Key Settlement as well as a Cross-Boundary Settlement in the Swansea Bay: The Waterfront and Western Valleys Area. Town Centre Regeneration in the Key Settlements is highlighted as a priority in the Wales Spatial Plan.

The WSP sets out a strategic framework to guide development across Wales, and its core theme seems to focus around promoting sustainable development. The WSP sets out visions for different areas of Wales. The vision for the ‘Swansea Bay – Waterfront and Western Valleys’ area, which includes Llanelli is:

*“An area of planned sustainable growth and environment improvement, realising its potential, supported by integrated transport within the area and externally and spreading prosperity to support the revitalisation of West Wales”*

One of the main elements of the strategy for the area is the development of a modern, attractive and vibrant waterfront urban area, which stretches from Port Talbot in the east through to Burry Port in the west taking in Neath, Swansea and Llanelli.

The Plan recognises that the area has the potential to become a key driver of the Welsh economy and development should be focused on Port Talbot, Neath, Swansea, and Llanelli prioritising the use of the abundant supply of brownfield land.

Planning Policy Wales is the principle document of the Welsh Assembly Government which sets out the land-use policy context for the consideration and evaluation of all types of development. The main thrust of PPW is to promote sustainable development by ensuring that the planning system provides for an adequate and continuous supply of land available and suitable for development to meet society’s needs in a way that is consistent with overall sustainability principles.

Planning Policy Wales confirms at Paragraph 1.2 that:

***“The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key***



**legislation. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places.”**

Planning Policy Wales has always promoted the notion of sustainable development as being central to all planning decisions in Wales. PPW defines sustainable development as:

**“Sustainable Development” means 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.**

**Acting in accordance with the sustainable development principle means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs”**

Paragraph 1.11 of PPW states that:

**“The Well-being of Future Generations Act places a duty on public bodies to carry out sustainable development. This is not a new concept for the planning system as the principles of sustainable development have been at the heart of planning policy since PPW was first published in 2002. However, the concept has been expanded under the Well-being Act and it requires an improvement in the delivery of all four aspects of well-being: social, economic, environmental and cultural.”**

The Act puts in place seven well-being goals to help ensure that public bodies are all working towards the same vision of a sustainable Wales. These seven well-being goals along with Carmarthenshire County Council’s own objectives are listed later on in this report.

The document outlines a number of relevant sustainable development principles, chief amongst which is the promotion of resource efficient settlement patterns and minimising land-take. There is also recognition that the location of development should aim to reduce demand for travel, especially journeys by private car.

Paragraph 1.15 of PPW states that:

**“The Planning Act introduced a statutory purpose for the planning system. Any statutory body carrying out a planning function must exercise those functions in accordance with the principles of sustainable development as defined in the Well-being of Future Generations Act. The planning system is central to achieving sustainable development in Wales. It provides the legislative and policy framework to manage the use and development of land in the public interest so that it contributes positively to the achievement of the well-being goals.”**

Section 4.9 of PPW provides a preference for the re-use of land. Paragraph 4.9.1 states that:

**“Previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites, particularly those of high agricultural or ecological value. The Welsh Government recognises that not all previously developed land is suitable for development. This may be, for example, because of its location, the presence of protected species or valuable habitats or industrial heritage, or because it is highly contaminated. For sites like these it may be appropriate to secure**

**remediation for nature conservation, amenity value or to reduce risks to human health.”**

Paragraph 3.5.1 states that:

**“Previously developed (also referred to as brownfield) land should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome....”**

Paragraph 3.5.2 of PPW goes on to state:

**“Planning authorities should work with landowners to ensure that suitably located previously developed sites are brought forward for development and to secure a coherent approach to their development. To incentivise the appropriate re-use of previously developed land, planning authorities should take a lead by considering and identifying the specific interventions from the public and/or private sector necessary to assist in its delivery. This will normally support regeneration initiatives and land allocations in development plans and will include the need to raise awareness of risks as part of an effective de-risking strategy. This approach will inform the development of appropriate risk assessments and remediation strategies at the application level intended to safeguard new developments from the health and environmental risks arising from past land uses, such as contamination, old mine workings or former landfill sites.”**

The Welsh Government in Chapter 5 of PPW defines Economic Development as:

**“the development of land and buildings for activities that generate sustainable long term prosperity, jobs and incomes. The planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses.” (Paragraph 5.4.1)**

It goes on to state that:

**“Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services. The construction, energy, minerals, waste and telecommunications sectors are also essential to the economy and are sensitive to planning policy” (Paragraph 5.4.2)**

Paragraph 5.4.4 states that:

**“Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration...”**

Planning Policy Wales is supplemented by various Technical Advice Notes (TAN's) which provide more in depth guidance on specific issues. In this instance guidance contained in the following TAN's are applicable:

- TAN 5 Nature Conservation and Planning (2009) seeks to ensure that protected species, habitats and designated sites are both protected and conserved by the planning system.

- TAN 11 Noise (1997) provides advice on how the planning system can be used to minimise the adverse impact of noise without placing unreasonable restrictions on development.
- TAN 12 Design (2016) seeks to promote sustainability principles through good design and identifies how local planning authorities can facilitate this process through the planning system.
- TAN 14 Coastal Planning (1998) provides advice on key issues relating to planning for the coastal zone, including recreation and heritage and shoreline management plans.
- TAN 15 Development and Flood Risk (2004) aims to direct new development away from those areas that are at high risk of flooding. Those areas of high risk are defined on a series of Development Advice Maps (DAMs) which detail three principle zones, A, B, C and sub-categories C1 and C2 that should be used to trigger Flood Consequence Assessments. TAN 15 defines what is considered to be vulnerable development and provides advice on permissible land uses in relation to the location of the proposed development and the consequences of flooding.
- TAN18 Transport (2007) endeavours to ensure Wales develops an efficient and sustainable transport system to meet the needs of a modern, prosperous and inclusive society.
- TAN 20 Planning and the Welsh Language (2017) provides guidance on how the planning system considers the implications of the Welsh language when LDPs are prepared. Further advice is provided in terms of determining planning applications where the needs and interests of the Welsh language may be a material consideration. In essence, the TAN advises that planning applications should not routinely be subject to Welsh language impact assessment as this would duplicate LDP site selection processes where LDP objectives indicated the need for such an assessment.
- TAN 23 Economic Development (2014) re-iterates the broad definition of economic development contained within the Chapter 7 of PPW, and states that it is important that the planning system recognises the economic aspects of all development and that planning decisions are made in a sustainable way which balance social, environmental and economic considerations.
- TAN 24 The Historic Environment (2017) provides guidance on how the planning system considers the historic environment during development plan preparation and decision making on planning and listed building applications.

With regards to protecting the integrity of the European designated site Regulation 63 of The Conservation of Habitats and Species Regulations 2017 reads as follows:-

#### **Assessment of implications for European sites and European offshore marine sites**

- 63.—** (1) A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which—
- (a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and

- (b) is not directly connected with or necessary to the management of that site, must make an appropriate assessment of the implications of the plan or project for that site in view of that site's conservation objectives.
- (2) A person applying for any such consent, permission or other authorisation must provide such information as the competent authority may reasonably require for the purposes of the assessment or to enable it to determine whether an appropriate assessment is required.
- (3) The competent authority must for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority specifies.
- (4) It must also, if it considers it appropriate, take the opinion of the general public, and if it does so, it must take such steps for that purpose as it considers appropriate.
- (5) In the light of the conclusions of the assessment, and subject to regulation 64, the competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be).
- (6) In considering whether a plan or project will adversely affect the integrity of the site, the competent authority must have regard to the manner in which it is proposed to be carried out or to any conditions or restrictions subject to which it proposes that the consent, permission or other authorisation should be given.
- (7) This regulation does not apply in relation to—
- (a) a site which is a European site by reason of regulation 8(1)(c);
- (b) a site which is a European offshore marine site by reason of regulation 18(c) of the Offshore Marine Conservation Regulations; or
- (c) a plan or project to which any of the following apply—
- (i) the Offshore Petroleum Activities (Conservation of Habitats) Regulations 2001(a) (in so far as this regulation is not disapplied by regulation 4 (plans or projects relating to offshore marine area or offshore marine installations) in relation to plans or projects to which those Regulations apply);
- (ii) the Environmental Impact Assessment (Agriculture) (England) (No. 2) Regulations 2006(b);
- (iii) the Environmental Impact Assessment (Agriculture) (Wales) Regulations 2017(c); or
- (iv) the Merchant Shipping (Ship-to-Ship Transfers) Regulations 2010(d).
- (8) Where a plan or project requires an appropriate assessment both under this regulation and under the Offshore Marine Conservation Regulations, the assessment

required by this regulation need not identify those effects of the plan or project that are specifically attributable to that part of it that is to be carried out in the United Kingdom, provided that an assessment made for the purpose of this regulation and the Offshore Marine Conservation Regulations assesses the effects of the plan or project as a whole.

- (9) In paragraph (1) the reference to the competent authority deciding to undertake a plan or project includes the competent authority deciding to vary any plan or project undertaken or to be undertaken.

Planning Policy Wales Technical Advice Note 5 'Nature Conservation and Planning' also reiterates this advice and seeks to ensure that protected species, habitats and designated sites are both protected and conserved by the planning system. In the case of this proposed development, where there is no direct on-site impact, it concentrates on those designated Natura 2000 sites to the south within the Loughor Estuary and Carmarthen Bay area.

In relation to flooding, the majority of the application site is located outside the defined flood zone as outlined in the Development Advice Maps referred to under TAN15 and is thus classed as Zone A. Figure 1 of Paragraph 4.2 of TAN15 describes Zone A as being considered to be at little or no risk of fluvial or tidal/coastal flooding. A small section to the eastern side of the site is within Zone C1 which is classed as an area of floodplain which are developed and served by significant infrastructure, including flood defences. The levels on this section of the application have been raised recently as a result of a previous planning permission granted. The lake itself is obviously classed as Zone C2 however this will remain undeveloped.

### **THIRD PARTY REPRESENTATIONS**

As aforementioned, two letters of representation have been received, one in support and one objecting. The reasons for objection raised relate to traffic congestion, lack of public transport proposals and air quality. These issues are addressed in detail in the following appraisal.

### **APPRAISAL**

#### **ENVIRONMENTAL STATEMENT**

The environmental impact assessment is a statutory requirement to enable an understanding of likely environmental effects and to prevent, reduce and monitor such effects where appropriate. The assessment also identifies and proposes enhancement for positive effects where this is possible. It is standard practice to split the assessment into construction effects and operational effects (i.e. once the development is complete).

On the 28<sup>th</sup> July, 2017, the LPA received a written request for a combined screening and scoping opinion relating to the proposed development pursuant to the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017. Following a comprehensive consultation exercise on this request, the LPA on the 20<sup>th</sup> September, 2017, confirmed that it considered the development to be EIA development. This correspondence also agreed the scope of the Environmental Statement.

Once the scope of the EIA had been established, individual environmental topics were subject to survey and investigation to establish the baseline conditions that exist before the

proposed development proceeds. This was followed by assessment to identify and predict the significance of the likely environmental impacts of the proposed development. The assessment methodologies applied were based on recognised best practice and guidance specific to each topic area; relevant details of assessment methodologies are provided in the appropriate assessment chapters of this ES.

The technical studies that have been undertaken for each topic area have generally followed the same approach:

The ES states that “significance” in terms of EIA defined as:-

- Resource value/receptor sensitivity;
- Magnitude of effect (adverse or beneficial);
- Temporal scale (temp or permanent).

Where relevant prevention and mitigation measures are a key part of the ES.

EIA Regulations also requires proposals to assess alternatives and therefore there is a section on this and design evolution of development in the ES. One of the key considerations here however is that the majority of the application site is allocated for such a use in the Adopted LDP.

The Environmental Statement submission has been accompanied by a non-technical summary, which summarises in non-technical language the findings of the EIA. The main ES report addresses in detail the topic assessments, whilst the appendices includes full copies of the technical reports referred to in the main ES.

As aforementioned, other environmental related reports such as the Drainage Strategy, Flood Consequence Assessment and Geotechnical Report have been submitted as separate documents. During the course of the planning application process an Environmental Statement Addendum was received which was informed by further surveys already listed in this report.

As agreed in the formal Scoping opinion, the environmental impact assessment has considered the following aspects of the environment:

## **Transport**

This chapter of the Environmental Statement (ES) provides an assessment of the projected traffic impacts of the development proposals on sensitive receptors, pedestrians and the local highway network. This assessment considers the likely environmental impacts both during construction and operational phase of the development.

The original ES was informed by a Transport Assessment (TA) of the potential traffic and transportation impacts of the developments during and after construction. A framework Travel Plan (TP) was also produced.

Following a request from CCC Highways and Transportation, the Transport Assessment was updated to include a sensitivity test which outlines the potential traffic impact of the development proposals if a potential signage strategy and a successful Travel Plan were to be introduced. This revised TA is included and referred to in the ES Addendum.

In addressing this topic matter, reference is primarily drawn to the consultation response received from the Authority's Highways Division, which provides an appraisal of the Transport Assessment and planning submission as a whole.

The Authority's Highways division provided a detailed response to the applicant as part of the formal Pre Application Consultation process, and the comments and requests made were re-enforced during subsequent meetings after the planning application was submitted. It was acknowledged that the TA and TP considers the transport impacts and requirements of the development based on a masterplan that represents an indicative proposal for the LWLV. Consequently both the TA and TP only provide a broad approximation of the likely impacts and requirements. Further iterations of such assessments and individual TP's will be required to fully understand the transport impact and requirements of the final development proposals for LWLV. Consequently, it was identified early on in the process that a number of transport related conditions will be required to be imposed on any outline planning permission granted.

During the early stages of the planning process the Authority's Highways division asked the applicant's highways consultant to address a number of points which included the following:-

- Further assessments of the traffic impact and review of the suggested highway mitigation proposals to establish what the trigger points for various mitigation proposals will be;
- Public transport provision and proposals;
- Active Travel - walking and cycling proposals. Connectivity should be considered not only in relation to existing provision but also in terms of CCC's aspirations as set out in the Integrated Network Maps (INM's) which for the basis for improving connectivity between communities and ley leisure/employment sites;
- On site transport infrastructure including an indication of likely parking provision; Potential for electric charging points; drop off facilities;
- Clarification on access arrangements;
- Further consideration of offsite highway improvements identified to mitigate potential traffic impact from LWLV.

As aforementioned, a revised TA was subsequently received and included within an addendum to the original ES. This was then considered in detail by the Authority's Highways Division.

The revised TA has been updated to include a sensitivity test which outlines the potential traffic impact of the development proposals if a potential signage strategy and a successful Travel Plan were to be introduced.

The signage strategy is proposed to redirect traffic from the B4304 Station Road towards Llanelli Town Centre and the A4138 corridor towards the M4. For the purposes of this sensitivity test, it has also been assumed that the Travel Plan could reduce the proportion of car drivers from 68% to 58%. The Transport Assessment explains that the sensitivity test does not represent the most robust assessment scenario in the Transport Assessment and has therefore not been included in the Traffic Chapter of the ES and does not therefore change the assessment outcome of the April 2018 ES.

The trigger points for the various mitigation proposals have not been identified within the TA. However, the trigger points have been identified by the Local Highway Authority and initial details of the necessary highway mitigation has been assessed for each individual development phase as currently proposed. These mitigation proposals are dealt with later on in this section.

In terms of public transport, whilst no additional information has been provided in the revised TA to address earlier comments, these elements can only be progressed once agreements have been reached with the bus operator on a bus service to serve the site. These agreements will need to be developed and confirmed during the relevant reserved matters stage and it is recommended that a joint approach be made for service improvements in conjunction with other development proposals in the area.

The LWLV development should not be occupied until a bus service agreement is confirmed for the site. Furthermore, the bus service for the site together with the necessary bus stop infrastructure should be secured and in place when the development opens to maximise bus use (8%) and to discourage use of the car for site travel. As the two main hub buildings to be developed within phase 1 will generate most trips to the LWLV it is considered that bus stop provision will need to be provided in this phase.

With regards to walking and cycling, the revised TA sets out the walking and cycling improvements proposed as part of this application including:

- several pedestrian and cycle crossings on the Coastal Link Road; and
- a commitment to provide high quality routes through the development site.

The Walking and Cycling proposals by the applicant to support the LWLV are as follows:

- Three crossings on the B4304 Coastal Link Road between the Copperhouse Roundabout and Delta Lakes Roundabout, including two signalised crossings and an uncontrolled crossing with a pedestrian refuge island.
- A signalised crossing for pedestrians and cyclists (TOUCAN) 125m south-east of the Copperhouse Roundabout; providing a link between the Millennium Coastal Path and the Shared footway cycleway through the LWLV development site. To accommodate pedestrians and cycles, this crossing would have a width of 6m, and a pedestrian refuge island, given the width of the road is 9.5m.
- A site access with a ghost island arrangement is proposed with the Coastal Link Road, 250m north-west of the Delta Lakes Roundabout. An uncontrolled pedestrian crossing with a refuge island is proposed directly west of this junction, providing an opportunity for pedestrians to cross near the junction. A second pedestrian crossing with a refuge island is proposed 160m west of the Delta Lakes Roundabout, adjacent to a potential link with the residential development to the south.
- The potential for a signalised crossing is being explored directly west of the Delta Lakes Roundabout. Whilst there is an existing uncontrolled pedestrian crossing with a refuge island at this location, it is considered that residents and visitors of the LWLV development will increase pedestrian footfall to the eco-park. As a result, a controlled crossing is being considered. This could be a TOUCAN crossing to provide a link for cyclists to the Millennium Coastal Path.



- In addition to the crossings on the Coastal Link Road, an uncontrolled pedestrian crossing with a refuge island is proposed on The Avenue, approximately 70m south of the junction with Northumberland Road. A 4m wide shared footway/cycleway is also proposed on western side of The Avenue between the Machynys Roundabout and the junction with Northumberland Road.
- A footway is proposed on the south side of Copperhouse Road and Northumberland Road, providing a link between the Coastal Link Road and The Avenue.
- Cycle parking for staff and visitors will be provided in accordance with the adopted CSS Wales Parking Standards (2008).

The TA opines that further contributions towards the pedestrian and cycle network (as presented in the INMs for Llanelli) is not considered to be required; given the significant improvements already proposed (as outlined in the bullet points above). It is also explained that CCC requested that potential pedestrian and cycle links, between the development site and Llanelli railway station, be explored, including the possibility of utilising the Copperworks site that has been partially developed for a primary school. Nonetheless, it is explained that these routes require land outside of the redline boundary and outside the extent of the adopted highway and therefore it is not possible to provide these potential routes as part of the LWLV proposals.

This section of the TA concludes by stating that:

- the Copperworks site is understood to be identified as a potential development site which could provide the walking and cycling route towards the railway station; and that –
- an alternative route along the B4304 is not considered to be viable without the removal of on-street parking which is anticipated to be unacceptable.

In accordance with the requirements of the Active Travel (Wales) Act 2013 the Highways Division disagreed with the opinion that further contributions towards the pedestrian and cycle network are not required or feasible. The Local Highways Authority has published INMs, and in particular, there is a current proposal to include active travel links from Copperhouse roundabout towards the Trostre roundabout and beyond. As such Highways have requested that the application makes a contribution towards providing the most southern section of this new link between the Copperhouse roundabout and the junction with Northumbria Road. The cost of creating this section of £47,000. This contribution has been agreed.

In terms of on-site parking and drop off facilities. As outlined in the TA, whilst estimating that approximately 620 spaces will be needed it is accepted that the current application is in outline form with all matters reserved and therefore the quantum of on-site parking has yet to be agreed. Therefore further consideration will be given to car parking provision as part of future reserved matters submissions.

With regards to access, the TA outlines that a total of five vehicle accesses are proposed into the development site, as set out below:

- Southern access via the Delta Lakes roundabout;
- Priority junction with a ghost island arrangement on the Coastal Link Road;

- Two simple priority junctions with the Avenue; and
- A simple priority junction with Copperhouse Road.

The Transport Assessment also states that detailed design of these site accesses will form part of the reserved matters application and will be subjected to a Road Safety Audit. Nonetheless, the preliminary designs of the site access arrangements are presented and described in the TA. As access is a reserved matter, detailed consideration will be given at subsequent Reserved Matters stages.

The revised TA confirms that the following junctions are forecast to exceed practical capacity in the future year scenario 2023 with Committed Development and the LWLV in place:

- Junction 1: A484/Coastal Link Road/Sandpiper Road Sandy Roundabout;
- Junction 10: Station Road Traffic Signals;
- Junction 13: A4138/Trostre Road/A484 Trostre Roundabout; and
- Junction 14/15: Halfway Traffic Signals.

The TA goes on to explain that further analysis has been undertaken to reflect the impacts of the proposed sustainable travel measures, namely a travel plan and signage strategy, on the mode split, and the resulting traffic impact of the development on the local highway network. Outline targets have been developed to reduce the overall number of trips made to the site by car (drivers).

The results indicate that the Travel Plan and Signage Strategy would have the desired effect of limiting the volume of development traffic travelling through Llanelli Town Centre and the B4304 (The Avenue, New Dock Road and Station Road).

As outlined earlier in this report, trigger points for the various mitigation proposals have not been identified within the TA. However, the trigger points have been identified by the Local Highway Authority and initial details of the necessary highway mitigation has been assessed for each individual development phase as currently proposed. These are outlined below:-

- ***(Junction 1) Sandy Road Roundabout***

The percentage impact of the proposed development at this junction is 7.3% in the AM and 7.4% in the PM peak hour.

The addition of the travel plan and signage strategy provides limited benefit at this junction and the assessment results are similar to the scenarios that do not consider either of these. Consequently, the original improvement scheme remains proposed at this junction to mitigate the impact of the LWLV development trips. This mitigation scheme (as detailed in Section 8.3 of the TA) includes the following:

- Increasing the flare from 5m to 15m on the A484 Pembrey Road entry;
- Increase the entry widths of the B4304 Beach Road arm to 7.5m and extend the flare from 10m to 30m.

Section 8.3.1 of the TA also notes that there are existing congestion problems at Iscoed Road / A484 Sandy Road signalised junction that impacts on the operation of the Sandy Road Roundabout. Furthermore, the TA states that it is considered appropriate that a

suitable contribution be made to wider improvement in this area should they be implemented by CCC.

The Local Highway Authority continue to explore major scheme solutions for Sandy roundabout and have a number of conceptual Schemes to develop further. This mitigation is required to accommodate traffic generated by Phases 1 and 2 of the development. CCC are also progressing with works to improve operations at the Iscoed Road / A484 Sandy Road Traffic Signals, with the improvements scheduled to be trialled during the school summer holiday period. The works at Sandy Roundabout shall be provided in part via developer contributions, for which a sum of £40,000 from this development has been agreed between Highways and the applicant. The contribution will be used to upgrade Sandy roundabout to mitigate for the proposed development.

- ***(Junction 10) B4304 Station Road/Queen Victoria/Murray Street Signals***

With the addition of the travel plan and signage strategy the impact of development trips is less than 1.5% at this junction. Consequently, no mitigation is proposed at this location and this is considered acceptable.

- ***(Junction 12) Trostre Road/Trostre Park Road Roundabout***

It has been agreed that no improvements are required at this junction as part of the LWLV development given that improvements are anticipated in conjunction with development aspirations for land adjacent to the roundabout.

- ***(Junction 13) Trostre Roundabout***

The percentage impact of the proposed development at this junction is 5.0% in the AM peak hour and 5.2% in the PM peak hour. The junction is also forecast to exceed theoretical capacity in both peak periods during 2033.

Given the quantum of planned and committed development proposed in Llanelli, it is stated within the TA, that Trostre Roundabout would benefit from a wider mitigation scheme that considers the impact of all these committed developments, with an appropriate contribution from LWLV.

A contribution towards the improvements as part of a wider A4138 Strategy by Highways will need to be confirmed following confirmation of the actual development mix during appropriate reserved matters stage(s). This mitigation is required to accommodate traffic generated by Phases 3 and 4. A condition should be imposed on any planning permission granted requiring the submission and subsequent implementation of an agreed scheme, and the relevant contribution towards this will need to be agreed and secured through an appropriate highway agreement.

- ***(Junction 14/15) Halfway Traffic Signals.***

The percentage impact of the proposed development at Junction 14 is 5.5% in the AM peak hour and 5.1% in the PM peak hour. At Junction 15, the impact of development is 4.7% in the AM peak hour and 4.4% in the PM peak hour.

With the addition of travel plan measures and the signage strategy, Junction 15 is forecast to exceed theoretical capacity in 2023 and 2033 with the addition of LWLV trips. Junction

PRC for both the AM and PM peaks in 2023 is in the region of -14%. This shows a slight improvement when compared to the assessment of the equivalent junction scenarios without the benefit of travel plan measures and the signage strategy, where the PRC was -16% and -25% for 2023 and 2033 respectively.

The original mitigation scheme remains proposed at this location which incorporates:

- Extension of the Right Turn Lane from the A4138 to Llandafen Road; and
- Banning right turn movements from Llandafen Road and Glyncoed Terrace.

The TA explains that whilst the mitigation scheme is shown to provide betterment further analysis would be beneficial to understand impacts on neighbouring junctions.

Again a contribution towards the improvements as part of a wider A4138 Strategy by Highways will need to be confirmed following confirmation of the actual development mix during appropriate reserved matters stage(s). This mitigation is required to accommodate traffic generated by Phases 3 and 4. A condition should be imposed on any planning permission granted requiring the submission and subsequent implementation of an agreed scheme, and the relevant contribution towards this will need to be agreed and secured through an appropriate highway agreement.

Finally, in terms of Construction Traffic Management Section 9 of the TA addresses the management of construction traffic. It explains that the impact of construction traffic on the network is not expected to cause undue inconvenience to other road users given the proximity of the site to the strategic road network. However, to ensure that construction activity is minimised there is a recommendation that the contractor(s) produces a Construction Traffic Management Plan (CTMP) in consultation with CCC.

Therefore to summarise, a detailed TA and revised TA have informed the original ES and subsequent ES addendum. The TA proposes a number of sustainability measures in the form of Travel Plans, signage strategy, public transport provision and improved cycle and pedestrian linkages. In terms of the latter, the site is well placed to make positive contributions to the local pedestrian and cycle network by creating connections and enhancing permeability through the site thus ensuring that the development is well integrated with neighbouring communities. A wider scheme of improvements planned by Highways in accordance with the Active Travel Wales Act allows for the development to make a contribution.

The development proposals are forecast to generate 511 two-way vehicle trips in the AM Peak Hour and 579 two-way vehicle trips in the PM peak hour. The TA identifies which junctions require improvement as a result of the traffic generated by the development, and the Highways division has advised when such improvements will be needed by. These improvements will be secured via appropriate conditions or agreed contributions.

Further consideration to access, car parking and pick up/drop off provision will be given at subsequent reserved matters submissions, whilst the requirement for Construction Traffic Management Plans will be secured via condition.

## **Noise and Vibration**

This chapter of the ES has been informed by a detailed noise assessment and considers the effects of noise and vibration on the surrounding environment and of the suitability of the

site in consideration of the effects of offsite noise and vibration sources upon the development proposed.

The Development has the potential to impact upon ambient sound and environmental noise during both the construction and operational phases and therefore both phases are assessed. Ground borne vibration will be induced during the early stages of construction. During operation of the development, there are no vibration sources that are likely to impact on buildings and occupants within and outside the development boundary.

For the construction phase, this included an assessment of the use of construction equipment, construction activities (such as site preparation and piling) and construction traffic noise. During operation of the site, noise would arise from use of electrical and mechanical building services such as air conditioning and ventilation units.

The scope of the noise and vibration assessment, noise and vibration limits and significance criteria were agreed with Carmarthenshire County Council Environmental Health Officers. The locations used for measuring representative background noise levels and the duration of the survey were subsequently been agreed by the local authority.

As part of the assessment, mitigation measures are proposed where appropriate, and the likely residual effects identified after any such measures have been adopted.

The baseline noise survey acknowledges that the site for the development lies adjacent to the B4304 on the southern boundary and The Avenue on the eastern boundary. There are residential properties adjacent to the development to the south, southeast and northeast. The Delta Lakes industrial park is situated to the southeast from the development.

To measure the baseline noise levels, a three day survey was conducted from Wednesday 1st to Friday 3rd November 2017 in five baseline measurement locations around the development site. The results show a range of noise levels. It was observed that road traffic mainly influences the baseline noise environment in the area and there is some localised commercial / industrial noise close to industrial premises.

In terms of the assessment of effects of development, during construction the use of powered mechanical equipment on site can give rise to high noise emissions at source and these will often vary in level and duration throughout the works programme. In general, it is normally expected that noise from the powerful equipment needed for site clearance, ground works and foundation construction will be noisier than the later stages of building construction and fitting out when smaller scale equipment will be used for lifting, assembly and fitting out. All stages of construction will induce road traffic on the local highways for the transport of materials from and to the site.

The predicted level of noise from construction sites depends on the particular items of powered mechanical plant used. At this time, before engineering and building design is undertaken, a fully detailed schedule of construction equipment is not available. Therefore, a typical schedule and equipment inventory has been outlined for construction of the development of this nature and scale. This is considered to be a reasonable scenario to represent the likely construction noise and vibration effects for the purpose of this assessment.

The assessment acknowledges that construction works will be phased over a 5 year period, and that on occasions due to the site's locale construction works will take place closer to

noise sensitive properties than on other occasions. It is also acknowledged that the stages of construction will vary in length i.e. the noisier groundworks stage is going to be significantly shorter than the quieter building construction stage.

During construction works significant increased noise levels were identified at a number of residential properties on the southern and eastern side of the site boundary (e.g. Machynys Bay and Maes-Y-Bwlch). However, this effect would only be for a short period of time during the overall construction period and would be at its worst when construction works are taking place close to the boundaries with these areas. Residential properties to the north of the site are not expected to be significantly affected during construction works.

These predictions assume the closest, unscreened floor level of the receptor. It should be noted that at ground floor level, receptors would benefit from the screening effect of the site hoarding for ground-based construction activities, such that the noise level would be lower.

In terms of predicted impact on non-residential receptors i.e. the Delta Lakes Enterprise Centre to the south east, it is predicted that the resulting noise level during construction would be within the BS 8233 guideline range of open plan offices. Although construction would at times be audible inside the building, on the basis of the above noise ingress, the noise effect of the noise impact is concluded as being not significant.

In relation to construction vibration, the use of compacting equipment for earthworks and sub-base layers to roads and paved areas and bored piling has the potential to induce vibration which may be felt by nearby receptors. The effect would depend upon the exact detail of ground conditions and the proximity of the construction activity to the neighbouring premises. Neither of these factors can be determined with a high level of accuracy at this stage so the effect must be reviewed qualitatively.

The ES expects that human disturbance effects associated with this level of vibration exposure could be satisfactorily managed by appropriate liaison with the building occupants. With appropriate controls these impacts would be for short periods while the works are closest to the site boundary the effects of these concluded to be not significant.

In terms of noise from construction traffic the number of heavy vehicle movements associated with the construction works has not been determined at this stage of the construction planning. However, in common with developments of sites such as the scale of the proposed, it is expected that access to the site by construction traffic would be restricted to the main roads, in this case on the southern and east boundaries. As such, noise effect from construction site traffic is therefore concluded as only being significant to dwellings south of the development.

The location of operational equipment such as plant and machinery would be controlled and determined during detailed design stage such that no noise or vibration effects would occur. The acceptable noise levels associated with such equipment will be secured via planning conditions imposed on any planning permission granted.

Noise would also arise from traffic that would be generated as a result of the development when operational. Such traffic is likely to use the main roads. The assessment has identified properties which already experience high levels of noise (e.g. north of the site along the Avenue), and which would subsequently experience an increase in noise from this source. Over the longer term however the level of change in noise to sensitive receptors alongside these roads is negligible and considered not to be significant.

With regards to mitigation, during the construction phase the ES sets out a series of standard construction management measures that will be implemented to minimise the likelihood of significant disturbance to neighbouring properties in accordance with good practice.

Although the measures outlined would control noise and vibration exposure to a minimum, nevertheless significant noise effects have been assessed at the residential receptors. The ES states that measures will continue to be explored to reduce these effects as far as practicable through detailed design and construction to reduce noise ingress into these buildings such that they are closer to guidance noise levels for the particular uses. These might include coordination of work to avoid greatest impacts at particular, most sensitive times.

The ES states that no mitigation is required for operational effects from building services with appropriate conditions applied to meet the required criterion in agreement with the Local Planning Authority.

In terms of noise levels within the proposed development itself the ES predicts that existing environmental noise levels at the future residential buildings are relatively low, particularly the noise levels during the night time. All proposed dwellings are in Noise Exposure Category 'B' or 'A' and the main source of road traffic noise is affecting the Development are the B4304 and The Avenue. There are no dwellings in NEC 'C'. Therefore, it is concluded that the site is suitable for development and that consideration be given to provide an adequate level of noise protection during detailed design. Further, it is recommended that office and other sensitive but non-domestic internal environments are adequate according to good standards (BS8233: 2014 Guidance on sound insulation and noise reduction for buildings).

The exposure of the development to ambient noise levels is therefore acceptable with building insulation mitigation that will be determined by the detailed design.

This section of the ES and accompanying noise assessment have been considered in detail by the Authority's Environmental Health Officer who deals with noise matters. In her consultation response she concludes that the proposed development will meet the criteria of TAN 11 and BS8233:2014 for daytime and night time internal noise levels with appropriate mitigation measures recommended.

Should planning permission be granted, the Environmental Health Section recommend that conditions are imposed which restrict hours of operation during construction phases; sets noise criteria for new residential dwellings within the scheme; and set noise rating levels from future plant and machinery.

## **Air Quality**

The potential impacts of the construction and operation phases of the proposed development on air quality have been assessed in this chapter of the ES. Potential air quality effects arise from dust and vehicle emissions due to earthworks and other construction activity, whilst development has the potential to impact local pollutant concentrations of nitrogen dioxide (NO<sub>2</sub>) and fine particulate matter from vehicles and car park related emissions during both construction and operation.

As the EIA is being completed for an outline planning application, no information is available regarding the proposed energy sources for the proposed development. During operation, it is likely that on-site combustion plant would be required to provide heating, hot water and possibly electricity to the various facilities of the proposed development. Where an on-site combustion plant is proposed at a later stage, the potential impact of these sources on local air quality should be assessed, in combination with impacts associated with road traffic assessed. In relation to heating the ES recommends the use of low NO<sub>x</sub> boilers if on-site combustion is required.

An Air Quality Management Area (AQMA) is an area that is designated by the local authority due to it not meeting national air quality objectives. There is an AQMA within 1.4km of the proposed site which means that air quality effects were assessed for construction traffic, construction activities (due to potential dust issues) and operational traffic and activities (such as use of combustion plant). The scope of the air quality assessment was agreed with the Authority's Environmental Health Officer that deals with air quality matters as part of the EIA screening/scoping process.

The overall approach to the air quality assessment comprises:

- a review of the existing air quality conditions at and in the vicinity of the proposed development;
- an assessment of the potential changes in air quality arising from the construction and operation of the proposed development; and
- formulation of mitigation measures, where necessary, to ensure any adverse effects on air quality are minimised.

In terms of existing air quality conditions in the immediate vicinity of the site, historic diffusion tube monitoring locations on nearby roads indicate that all the concentrations were well below the annual mean NO<sub>2</sub> objective. The Defra website includes estimated background air pollution data for each 1km by 1km OS grid square in the UK. Based on this, background concentrations are estimated to be below the air quality objectives for annual mean NO<sub>2</sub> and PM<sub>10</sub> (40µg/m<sup>3</sup>) and annual mean PM<sub>2.5</sub> (25µg/m<sup>3</sup>).

However diffusion tubes located in the Llanelli AQMA which is approximately 1.4km away from the site indicate that concentrations of annual mean NO<sub>2</sub> are exceeding the air quality objective in those locations.

With regard to the assessment of effects, it is acknowledged that there are sensitive receptors namely residential dwellings in close proximity to the application site, and within 50m of the site boundary. The proposed development does not involve any demolition works as part of the construction phase. Whilst the proposed construction period will last approximately 5 years the development as a whole will be phased throughout this period. The traffic data used to inform the Air Quality Assessment has been derived from the Transport Statement submitted with the application and which has already been referred to in this report.

The application comprises a range of proposed facilities and whilst the specific details of these facilities are as yet largely unknown, the application does provide details relating to the car parking provision for the site and predicted traffic volumes for both the construction



and operational phases of the development. The proposed car parks within the scheme have been designed and positioned away from sensitive residential areas.

The AQA has been carried out using the predicted traffic volumes, along with count data obtained during 2017, and utilising NO<sub>2</sub> diffusion tube data from 2016. The AQA concludes there will be negligible impact on air quality from the traffic associated with the proposed development in terms of local air quality management and in respect of the Air Quality Objectives. As a result no mitigation is proposed during the operational phase. In respect of the construction phase, mitigation measures have been proposed to reduce potential dust impact that are to be included within the Construction Environmental Management Plan and a separate Dust Management Plan is to be produced.

The traffic analysis identifies impacts at a number of junctions along the main access routes to the proposed development and suggests that with junction improvements such impacts could be alleviated. This mainly relates to driver waiting times and pedestrian safety measures. It would be very difficult to assess impact on air quality from these locations as no monitoring data exists for them.

The AQA has been considered in detail by the Authority's Environmental Health Officer who deals with air quality matters. He has responded stating that it is not considered that the traffic volumes associated with the proposed development will have a significant adverse impact on air quality, at any particular location, as regulated under the Environment Act 1995 and in relation to the requirements of Local Air Quality Management. However, it is suggested that any identified junction improvements that reduce waiting times, and therefore engine idling times, be conditioned.

He has also advised that the provision of electric vehicle charging points and an overall travel plan (once more detailed information about specific buildings and their use is known) be developed to work towards general air quality improvement as part of the development.

## **Water Resources**

This section of the ES has been informed by an original Drainage Strategy Report. During the course of the planning application process, Dwr Cymru/Welsh Water (DCWW) were commissioned to undertake a detailed Hydraulic Modelling Assessment (HMA) to examine whether there was sufficient capacity within their network to accommodate the foul flows generated by the proposed development. The results of this HMA has informed a revised Drainage Strategy and Addendum to the original ES.

This subject matter is mainly concerned with the impact from the operational phases of development. There will be no implications in terms of foul drainage until the site becomes operational. Whilst the consideration of surface water disposal also largely relates to the operational phase, the impact during construction of surface water runoff to the water body and any impact upon groundwater during construction are also relevant considerations. During construction there are a number of activities which could potentially affect the quality of water within surface water bodies and groundwater, however the implementation of a Construction Environmental Management Plan and Method Statement detailing all necessary pollution prevention measures will mitigate these effects and remove the risk. The requirement for such detail will form part of pre-commencement conditions imposed on any planning permission granted.

There are a number of existing DCWW assets that run through site including rising mains. These assets will necessitate relevant easements, which in turn will reduce developable areas within the site.

There is no foul generation from the site as it currently exists. The majority of developments in the locality drain into localised pumping stations, which in turn feed into the larger Northumberland Pumping Station. Northumberland Pumping Station is an important strategic asset for DCWW, and is currently subject to improvement works by DCWW to increase capacity at the station.

The Dafen River enters the site from the east and flows into the New Dafen River, a man made water body located within the centre of the site. The level of the lake is controlled by a lock gate on the B4304 before converging with Afon Lliedi to the south west of the site. Afon Lliedi almost immediately discharges into the Burry Inlet/Loughor estuary which forms part of the Carmarthen Bay and Estuaries European Marine Site. Rainfall across the majority of the site permeates through the made ground and into a perched water table above the alluvium. It is considered likely that this water flows towards and dissipates into the lake through the made ground and / or into the underlying aquifers.

As aforementioned in this report the development of the Wellness Village will be phased over a five year period. The Drainage Strategy estimates that the peak foul flow associated with the development will be 39 litres per second. During the course of the planning application process, DCWW required that a detailed Hydraulic Modelling Assessment be undertaken to examine whether there is sufficient capacity to accommodate the flows generated from the site into their network. The HMA Report published in October 2018 shows that all four phases of the development cause detriment with regards to potential flooding when the development flows are added to the network. However the HMA goes on to state that flows transmitted from the development can be accommodated in their network provided that connections are not made before 31<sup>st</sup> March 2020, when improvements currently being carried out by Northumberland Pumping Station are complete. In this respect, it is understood that the first buildings to be constructed on site will not be ready for occupation until September 2021.

The HMA identified that the foul flows from Phase 1 of the development, which is to connect into the existing pumping station constructed a few years ago at Delta Lakes, has the potential to cause flooding upstream of the pumping station itself. The pumping station was built to service a more modest future development on site and the surrounding area. However; the proposed development is now substantially greater than the previous plans and the pumping station does not have sufficient capacity for all the proposed flows from the Delta Lakes East and West area. In order to address this issue and avoid upstream sewer flooding, improvement measures are required and the HMA identifies the following five possible solutions:-

- 1 Direct Phase 1 flow by gravity to connection point north-east of Avenue West site.
- 2 Direct Phase 1 flow into new pumping station formed in Phase 3 and 4 area.
- 3 Remove impermeable area/surface water flows in off-site land to the east.
- 4 Upsize existing gravity sewer on site to provide storage.
- 5 Modify existing pumping station and rising main to increase pass flow.

Whilst DCWW favour Solution 3, this site is in private ownership and therefore the applicant has no control over that area in order to implement a surface water removal scheme. There is also uncertainty as to whether a removal scheme is in fact possible in this location. Such improvements would require third party agreement and unknown level of physical works. In light of the above, the preferred option for the applicant is Solution 4 which is wholly within the applicant's demise and works are clearly and confidently defined. This will involve the upsizing a 167m length of existing 150mm diameter pipe to 500mm to provide 33m<sup>3</sup> additional storage. This solution allows the existing pumping station to be utilised without modification.

Due to the existing site topography and constraints, the foul drainage strategy for the development is largely split into two sections, the area to the south of the lake (Phases 1, 3 & 4) and the area to the east of the lake on to The Avenue (Phase 2). The area to the east (Phase 2) will connect into the public sewer to the north by gravity. For the southern area, as aforementioned the first phase of development will connect into the existing pumping station, subject to improvement works to create additional online storage to prevent sewer flooding upstream. For the subsequent phases of development (Phase 3 and 4) a new pumping station will be built on that area of the site and transmit foul flows via a new rising main to the DCWW sewer network to the north of Phase 2. It is understood that a connection point for all flows has been agreed with DCWW.

In terms of surface water disposal, due to contamination, the made ground, and geoenvironmental considerations, existing infiltration is to be reduced as much as possible and infiltration measures to deal with storm water are not considered appropriate in this instance. This is a key principle of the remediation strategy in order to prevent water mobilising contamination before discharge into the lake or groundwater. There is an existing large lake on site and it is proposed that this water body will be used as an attenuation feature. Drainage will discharge by gravity into this large water body. More localised SUDS solutions including swales, filter drains and permeable paving will be considered at detailed design stage to reduce flow rates and also improve water quality. If such measures are not feasible, petrol interceptors will be installed within the commercial plots containing large areas of parking or where loading areas are required. As the New Dafen River is classed as a main river, a flood risk activity permit from NRW will be required prior to discharge. It is considered that a hierarchical approach has been adopted in the consideration of surface water disposal methods, and further consideration will be given as the scheme progresses towards more detailed design.

The foul and surface water drainage systems will be offered for adoption to DCWW under a Section 104 Agreement.

As Members of the Planning Committee will be aware, there has been a long standing concern over Water Quality in the CBEEMS. The most recent Memorandum of Understanding (MoU) entered into between Carmarthenshire County Council, City and County of Swansea, Dwr Cymru/Welsh Water and the former Environment Agency and Countryside Council for Wales (now Natural Resources Wales) 2011 is relevant in this respect. This document sets out the partnership approach to improve and safeguard the environmental quality of the CBEEMS when taking decisions on development and regeneration schemes. The MOU includes, inter alia, a commitment on the part of the Local Planning Authority to manage a Register which records the increased foul sewage discharges (emanating from new developments) and also the amount of surface water to be removed from the combined sewerage network as part of development proposals. The

commitment by developers to remove surface water from the combined system as part of development proposals thereby achieving betterment in the system is defined in the MOU and this in turn achieves benefits in terms of hydraulic loading and a reduction in the frequency of existing discharge events into the estuary.

The total foul flows generated in all phases of the development is 39 l/p/s, however the peak flow discharged into the DCWW's external sewer network will be significantly less than this, since pumping stations store peak flows and transmit at a lower rate. As aforementioned the HMA undertaken by DCWW has confirmed that there will be capacity to accommodate these flows in the network subject to certain improvement works. Nevertheless, for the purposes of evidencing compliance with the MOU, it needs to be shown that more than 39 l/p/s of surface water can be removed from the combined sewer system.

In this instance, no opportunities exist on site to remove surface water from the combined sewer system. Therefore the next stage sequentially is to identify whether any opportunities exist within the sewerage pumping station catchment, namely the Northumberland Pumping Station catchment. In this respect, a new school development has recently been completed by Carmarthenshire County Council on land at the former Draka factory site which is in very close proximity to the immediate north of the application site. Prior to its re-development for a new school, this 2.78ha site was covered by buildings and hardstandings which directed surface water and foul flows to the combined sewer network. Its re-development as a new school resulted in significant surface water flows being re-directed away from the combined sewer and instead dealt with via on site infiltration. In accordance with the MOU, it was calculated that 83.47 l/p/s of surface water was removed from the combined sewer. The new school itself only generated 2.65 l/p/s of foul, and therefore in excess of 80 l/p/s of betterment was achieved. The applicant on the current application is the same and proposes to utilise some of the betterment achieved on the Draka site to compensate for the 39 l/p/s of foul created by the proposed development.

The above scheme at Draka is only one of a number of surface water removal schemes implemented by the applicant within Llanelli which have resulted in the removal of surface water from the combined sewer. DCWW are also implementing a number of such improvements as part of their Rainscape scheme. In this instance the re-development of part of the former Draka site has achieved sufficient betterment not only to enable the school development to proceed, but to also enable the Wellness Village to comply with the requirements of the MOU. The LPA will proceed to update its drainage register accordingly to reflect this.

In terms of responses from statutory and other relevant consultees on this issue. There has been close dialogue with DCWW and NRW throughout the planning process. In their most recent response DCWW confirm that following the completion of their capital investment scheme at Northumberland PS, sufficient capacity will be available to accommodate the development. DCWW also confirm that the surface water removed from the Draka site has not been factored into their Rainscape calculations and therefore it can in their opinion be apportioned to the Delta Lakes site in order to satisfy MOU requirements. On this basis, DCWW do not raise any objection subject to the imposition of condition relating to the improvement works referred to above.

NRW has also raised no objection in relation to this issue. They note in their response that DCWW has confirmed that there is capacity to accommodate foul flows from the development following the completion of improvement works at NPS in March 2020. They also state that it is imperative that the pollution prevention measures referred to above are

incorporated during construction and operation phases to ensure that water quality of adjacent controlled waters is not adversely affected. Finally in terms of the MOU, they advise that the LPA need to be satisfied that compliance is achieved and that the drainage register is subsequently updated accordingly.

The Authority's Land Drainage section has confirmed that the proposed surface water management strategy is acceptable in principle as infiltration options on site will be limited due to land contamination issues. They do however advise that localised SUDS schemes should be considered for each phase of the development.

Therefore to summarise, the proposed scheme has separate foul and surface water drainage proposals which ensure that no surface water enters the public sewer network. There are no objections from relevant consultees, who have confirmed that there is capacity in the network to accommodate foul flows, whilst the surface water drainage strategy is considered acceptable. The proposed development also satisfies the requirements of the CBEEMS MOU.

## **Flooding**

The original ES was informed by detailed flood modelling that assessed the risk of fluvial and tidal flooding, and a Flood Consequence Assessment (FCA) subsequently produced. During the course of the planning application process technical comments were received from NRW and additional discussions have taken place since regarding the flood modelling. This has resulted in revisions to the flood model and a revised FCA has been produced. This revised FCA is included within, and has informed the ES Addendum.

The revised FCA advises that the levels of the site vary between 3.5mAOD near to the lake shore to 8mAOD along the existing site access road within the Delta Lakes west area.

However, the ground level of the main areas within the site allocated for the proposed development are between 6.8m and 8.0mAOD. Recently the ground level within the Delta Lakes East plot was raised by CCC and now has a development plateau of 6.8-6.9mAOD.

The existing ground level of the site will need to be raised by around 0.5m to provide capping above existing contamination and to provide a full construction thickness for road, car parks, hardstandings, slabs, and soft landscaping. The proposed development platform levels vary between 7.2m and 8.4mAOD.

In terms of vulnerability the proposed development is mixed use, whilst a proportion of uses are commercial and may be considered as Less Vulnerable Development, the proposal does include residential assisted living and a leisure centre and therefore in overall terms the FCA considers the development as Highly Vulnerable Development.

The TAN 15 Development Advice Map (DAM) for the area of Delta Lakes indicates that the site is within a mixture of Zones A, B, C1 and C2. The majority of the site is within Zones A (little or no risk) and B (areas known to have flooded in the past). Parts of the eastern area of Delta Lakes East area and the shores of the lake is within Zone C1 (area of floodplain served by significant infrastructure including flood defence), whilst the Afon Dafen and Lake are within Zone C2.

NRW's own flood map shows that the majority of the site is outside flood risk areas, however the eastern area of the Delta Lakes East site is within Flood Zone 3, but benefitting from

flood defences. Additional local areas are within Delta Lakes East are within Flood Zone 2. The Afon Dafen Lake and shores are also within Flood Zone 3. Flood Zone 2 is defined as the extent of a flood from rivers or from the sea with up to a 0.1% (1 in 1000) chance of happening in any given year. It also contains areas recorded to have flooded in the past. Flood Zone 3 is defined as the extent of a flood from rivers with up to a 1% (1 in 100) chance of happening in any given year or from the sea with up to a 0.5% (1 in 200) chance of happening in any given year.

NRW's Surface Water Flood Map shows that the majority of the site is not at risk of flooding. However, localised areas have low risk areas of flooding. These appear to be topographical low areas where surface water run-off could accumulate at shallow depth.

The revised modelling undertaken indicated that the fluvial flood levels along the Afon Dafen are well below the site levels. However, the extreme tide levels are closer to the site levels, and these will be the determining factors, extreme tide levels are summarised below:

- 0.5%+CC (1 in 200 year plus 100 year climate change increase) – 6.83mAOD;
- 0.1%+CC (1 in 1000 year plus 100 year climate change increase) – 6.96mAOD.

The flood modelling examined a combination of fluvial and tidal events, taking into account the effects of climate change, together with breach event for the 0.5%+CC event. In summary, the modelling shows the following worst case flood levels around the site:

- 0.5%+CC Tidal in conjunction with QMED+75% Fluvial = 6.303mAOD;
- 0.1%+CC Tidal in conjunction with QMED+75% Fluvial = 6.352mAOD;
- Breach 0.5%+CC Tidal with QMED+75% Fluvial = 6.8mAOD.

The FCA advises that the areas of proposed development are already above 6.8mAOD, and therefore the development areas do not flood during the extreme events modelled, including the breach event. It is recognised that the water level within the dock will increase, however this does not reach the development areas. Therefore, providing the ground levels of the site remain as existing or are increased, no further mitigation measures are considered necessary.

It was however noted during the study that the lock structure contains flap valves that are some 25 years old and may not be operating effectively. Furthermore, it has been noted that the lock gate is lower than the more extreme flood levels, taking into account climate change over a period of 100 years. Therefore the FCA recommends that the flap valves are inspected, in detail, repaired or replaced if required and maintained regularly. In addition, whilst flooding does not occur to the site or surrounds, to prevent saline and silt inclusion during an extreme flood event, it is recommended that measures are included to uplift the outer or inner gate level by provision of an additional plate, so that the level of defence is upgraded above the predicted extreme tide level, plus a freeboard of 0.3m i.e. 7.3mAOD.

In terms of surface water flood risk, the site will be fully developed, including building and hardstandings incorporating specific drainage measures designed to current standards. The risk of surface water flooding in the lower areas will consequently be mitigated by such measures.

TAN 15 states that new development should be directed away from Zone C and towards suitable land in Zone A or B. However, it also recognises the need to be flexible in addressing flood risk whilst considering the negative economic and social consequences if

policy were to preclude investment in existing urban areas, and the benefits of reusing previously developed land. It recommends that Highly Vulnerable Development and Emergency Services should not be permitted in Zone C2. For all other developments in Zone C, the tests outlined in Sections 6 and 7 of TAN 15 should be applied to justify the location of the development and to assess the consequences of flooding.

Since a small part of the site are within Zone C1, the justification test has been applied in the FCA. Paragraph 6.2 of TAN15 reads as follows:-

“Development within Zone C will only be justified if it can be demonstrated that:

- i. Its location in Zone C is necessary to assist, or be part of, a local authority regeneration initiative or a local authority strategy required to sustain an existing settlement; **or**
- ii. Its location in Zone C is necessary to contribute to key employment objectives supported by the local authority, and other key partners, to sustain an existing settlement or region; **and**
- iii. It concurs with the aims of Planning Policy Wales (PPW) and meets the definition of previously developed land; and,
- iv. The potential consequences of a flooding event for the particular type of development have been considered, and in terms of the criteria contained in Sections 5 and 7, and Appendix I found to be acceptable.”

With respect to criterion (i) and (ii) the LPA agrees with the FCA that the proposed development represents a strategic objective opportunity and is identified for such a development in the Adopted LDP. The proposal is a key economic and regeneration driver at both a local and regional level that will contribute significantly towards employment objectives.

The development site is clearly previously developed land (criterion iii) whilst the consequences of a flooding event have been considered and found to be acceptable within the FCA (criterion iv). As such, the LPA considers that the proposed development adheres to the justification test outlined in TAN15.

The FCA assesses the flooding consequences in accordance with guidance provided in section 7 and appendix 1 of TAN 15.

It states that the controlling mechanism of flooding is the rising tide levels within the Loughor Estuary and the overtopping or breach of the tidal defences located along the coastline in the vicinity of the site, in combination with lesser fluvial events. The modelling shows that the site does not flood for any of the modelled scenarios. Furthermore, the finished level of the proposed development will be typically between 7.2m and 8.0mAOD, above the extreme flood levels AOD.

The results of the modelling and extreme tide levels include an allowance for global warming. This allowance is based on the current DEFRA guidance. The modelling shows that the site does not flood, the proposed site levels are all above the extreme tide levels, taking into account 100 years of climate change increases. This will ensure that a safe and secure living and/or working environment is provided to those occupying the site.

The FCA states that having the finished level of the proposed development well above the river level and also the extreme tide level provides an acceptable degree of mitigation. The primary mechanism of flooding is tidal inundation resulting from rising tide levels in the Loughor Estuary. Blockages, if any, will not increase the tide level and therefore not result in an increased risk of flooding on site or elsewhere within the area.

The model indicates that even if the flood defences are breached, flooding does not reach the site and having the finished level of the proposed development above the estimated 1 in 200 year tide level including 100 years of climate change increases will ensure that the proposed development remains flood free.

In the event of an extreme flood, the development will remain flood free for up to and including the estimated 1 in 200 year and 1 in 1000 year tidal event including 100 years of climate change increases. As a result, the FCA opines that no conditions are required to be attached to the planning permission in terms of mitigation.

As the main flooding mechanism is tidal and the model demonstrates that this does not extend to the site, the FCA states that no water will be displaced as a result of changing site levels. Therefore there will be no adverse impact on flood risk elsewhere.

The modelling has however indicated that some of the access roads beyond the site boundary will flood for a period of up to 2.5hrs, however emergency access/egress will be feasible from Llanelli Coastal Road, New Dock Road and The Avenue to the north. The FCA states that the depth of flooding on these external access roads are shallow, less than 270mm with a hazard rating of low to moderate, vehicular access/egress will be feasible via these routes.

In light of the above, the FCA concludes that the risk of flooding for the proposed development is acceptable in accordance with TAN 15, and the proposed development has no adverse impact on the existing flooding situation.

The ES Addendum has reviewed the findings of the model and FCA, including the assessment of impacts and significance, and concluded that there are no changes to the impacts and significance highlighted in the original ES.

The LPA has re-consulted NRW on the revised flooding information. NRW has confirmed that they are currently in the process of reviewing the model and will respond accordingly in due course.

## **Ground Conditions**

This chapter of the ES assesses the likely significant effects of the proposed development with respect to ground conditions, and is based upon the findings of the Geo-technical and Geo-environmental report undertaken in 2016. These reports have been submitted separately as part of the planning application. A mining risk assessment of the site was also undertaken. The scope of the assessment in this respect was agreed by the LPA following consultation with relevant consultees at the EIA screening/scoping stage.

For the purpose of the assessment, the study area has been defined as the application site whilst a buffer area of 200m around the site boundary has also been investigated to identify any potential off site sources and receptors of potential contamination.



A desk-based assessment of ground conditions has been undertaken to determine the baseline conditions within the site. The information has been used to develop conceptual site models (CSMs) for the site. This has been developed in accordance with the risk management framework provided in CLR11, *Model Procedures for the Management of Land Contamination*. The need for further focused assessment has been considered on account of existing or suspected contaminated land which may have an effect as a result of construction and operation, i.e. by creating or altering pollutant linkages between sources of potential contaminants and sensitive receptors such as humans, ecological receptors, surface water and groundwater bodies.

The existing site is generally open derelict land consisting of rough grass / scrub locally with areas of hardstanding and gravel capping layers. The area has historically been used for heavy industry, including the South Wales Iron and Tin Works, occupying the west and south western site area, which also included old lime kilns, sandpits, a number of industrial units (including a gasometer) and some smaller works buildings with associated access roads and railway infrastructure. Brickfield clay mill and Brickfield chemical works were previously located in the eastern and south eastern extremities of the site. The Brickfield chemical works originally produced sulphuric acid and arsenic and later produced copper sulphate, iron sulphate and sulphuric acid.

As aforementioned in this report some recent site re-profiling works have been undertaken to the eastern part of the application site, which are referred to in the ES. The 18,000m<sup>3</sup> of materials imported to site to do this were sampled and screened for contamination purposes.

The preliminary mining risk assessment indicates that there are 4 adits recorded by The Coal Authority immediate north of the New Dafen River watercourse, 3 within the site boundary and one on the outskirts of the site. The treatment (if any) of these adits is unknown. The ES recommends further ground investigation of these features is required, and remedial measures may be considered necessary following subsequent investigations. In this respect the Coal Authority has been consulted on the application and has raised no objection towards the proposed development subject to the imposition of a condition on any planning permission granted requiring further site investigation works as recommended in the ES.

The geotechnical desk study indicates that the general ground conditions across the whole site consist of made ground associated with previous industrial uses overlying relatively impermeable estuarine alluvium. Such historic industrial uses, have unsurprisingly provided potential sources of both soil and groundwater contamination (particularly metals, PCBs and hydrocarbons) and also ground gas.

Based on the human health, groundwater and ground gas risk assessments, and the potential pathways which maybe present onsite, the ES states that there is a potential risk to human health (construction workers, end site users and local neighbours) and environmental receptors (including controlled waters; groundwater and surface waters, landscaping and vegetation and potentially building materials), during and post construction. Therefore the ES states that further ground investigation to eliminate data gaps and help to establish mitigation measures, will therefore be required to control and manage the risks posed.

At present, no topic specific mitigation measures have been incorporated into the project design. Further ground investigation and subsequent data analysis and risk assessments are required. However, the ES is confident that following further site investigation (to

establish what contamination exists) and the implementation of various risk assessments, construction management plans and remediation plans, these impacts can be mitigated such that the risk is minimised and no significant effects are predicted in terms of human health and environmental receptors either during construction works or at operational stages.

In terms of groundwater, site works may introduce preferential pathways for contamination to migrate such as piling works or leaks/spills from plant machinery or traffic. Therefore following undertaking detailed groundwater monitoring and risk assessments a foundation works risk assessment may also be required. The results of such investigations will inform the design of any mitigation measures required.

In terms of human health receptors, construction workers will be subject to short term exposure of potential contaminants only (potential for acute dermal, ingestion and inhalation exposure over a limited time frame during the construction works). On the basis that there is a risk to construction workers during the development, and the risks require mitigation. In general terms the risks posed to construction workers and neighbours to the site during constructions works can be mitigated through following correct Health and Safety procedures and ensuring adequate measures to control dust. Further details in this respect would be included within a Construction Environmental Management Plan.

When operational the ES opines that there would be a low likelihood of human exposure to potential contaminants onsite. This is on account of either hard standing proposed at surface level, (preventing dermal contact and dust inhalation of soil contaminants) or clean landscaping (imported clean top soils underlain with a clean soil cap and where required a geotextile membrane). Whilst external finished levels have yet to be finalised for the site and analysis on import/export of material from site has yet to be undertaken, it is likely that existing ground levels will need to be raised slightly to provide capping above existing contamination and to provide a full construction thickness for road, car parks, hardstandings, slabs, and soft landscaping.

Whilst no specific mitigation measures have yet to be proposed, the ES states that prior to construction additional ground investigations are required to further assess the ground and groundwater conditions and also the ground gas regime across the site and to allow further more detailed human health and controlled water risk assessments. If based on the findings of the risk assessments, it is considered necessary, remedial options would be developed and a verification plan (produced to mitigate the risks identified) and agreed with the local planning authority. Following completion of any remedial works a verification report would be produced. Standard good practice would be followed during construction to ensure that there are no pollution incidents or in circumstances where unexpected contamination is found.

The approach adopted in respect of this issue by undertaking a desk based preliminary risk assessment in the first instance, and then recommending that further ground investigation work is undertaken to inform any required remediation, mitigation and verification plan, is standard practice. This approach has been supported by both Natural Resources Wales and the Authority's Public Health Division who have raised no objection to the application subject to the imposition of a number of pre-commencement conditions on any planning permission granted in relation to ground conditions. Such conditions will be imposed in the interest of protecting both the environment and human health.

## **Biodiversity**

The original ES assessed the likely significant effects of the proposed development on the ecological resources within the site and surrounding vicinity, and was informed by a number of detailed habitat and species surveys. The ES documents the results of the survey work undertaken in addition to reporting the value of receptors and assessing the effects arising from the proposed development both during construction and when operational.

The original ES considered the following:-

- Designated sites;
- Non-statutory designations;
- Invertebrates;
- Amphibians;
- Reptiles;
- Birds;
- Otter;
- Water Vole;
- Badger;
- Bats;
- Dormice.

The ES goes on to propose a number of design mitigation measures both during construction and operational phases that will avoid or reduce potential impact on ecological receptors.

Mitigation measures proposed include:

- Reptile trapping and translocation;
- Retention of existing habitats where possible;
- Sensitive and appropriate timing of vegetation clearance works to avoid bird nesting and allow amphibians and reptiles to be displaced safely to adjoining areas;
- Pollution and surface water run-off prevention measures;
- Implementation of an Invasive Species Management Plan;
- Avoidance of security or task lighting shining on the water courses and areas of retained habitats; and
- Ensuring that any excavations have a safe means of escape for mammal species if left over night.

Recommendations for the operational development to reduce the likelihood of impacts include:

- Adoption of a lighting design in accordance with the Bat Conservation Trusts Bats and Lighting publication;

- Implementation of a landscape planting strategy to using native species, designed to protect and enhance habitats within the development site, to provide undisturbed areas and to provide habitat connectivity; and
- Implementation of an Ecological Management Plan to ensure that the mitigation and enhancement measures are maintained and provide the benefits.

Once operational the proposed development is considered to give rise to ecological impacts limited to air and water pollution, the disturbance of animals by use of the site, and animal mortality through collision with vehicles.

A number of opportunities have been highlighted to achieve ecological enhancement to ensure compliance with the Environment Wales Act 2016 including landscaping habitats for the benefit of Water Vole and other protected species. The masterplan for the site is sensitively designed to protect existing biodiversity features at the site including watercourses and enhance and create habitat and landscape areas to avoid harm to the natural environment.

The ES goes on to outline what monitoring arrangements are proposed before concluding that provided the measures proposed are adopted there will be no significant residual impact on the identified ecological receptors at either construction or operational stage.

In coming to this conclusion, the original ES was mindful that the current application is in outline form and therefore detailed design needs to progress in accordance with the recommendations made. The original ES also acknowledged that due to the time of year, certain species surveys were ongoing and would only be completed later in 2018.

During the course of the planning application process, and following the completion of additional Ecological survey work, the LPA received an ES Addendum. The ES Addendum was informed by:-

**Bat Surveys** – which confirmed that no rare or notable bat species forage on the site although the site does support foraging and commuting activity of common species as assumed within the original ES. With mitigation measures in place, as proposed in the ES, it is considered that the survey results do not change the conclusions of the Original ES.

**Wintering Bird Surveys** – Following the wintering bird surveys it was possible to complete a Statement to Inform an Appropriate Assessment (SIAA). This confirmed that the supporting habitats listed for the feature species do not occur within the site boundary.

The wintering bird survey has shown some species which form a small part of the assemblage to be using areas within the site, principally the New Dafen River, and as such the lake could be considered a 'resting area' in the context of third conservation objective. However, total numbers recorded were low (<1% assemblage totals) and as such significant disturbance effects are unlikely to occur from works in or close to the New Dafen River. Other assemblage species are present on nearby intertidal habitats, though again in limited numbers.

Whilst the margins of the lake are already subject to frequent disturbance from dog walkers etc., the construction activities have the potential to disturb birds, and therefore mitigation measures are proposed in the form of screening, ecological watching brief and ecological management plan etc.

With the inclusion of the mitigation measures outlined above the ES Addendum concludes that the proposed development is unlikely to give rise to an adverse effect on the integrity of the Burry Inlet SPA/Ramsar sites. Whilst the lake in the centre of the site could be considered as a resting place for a small number of assemblage species, the measures outlined should be sufficient to ensure that disturbance is kept to a minimum in line with the requirements of the conservation objectives.

**Breeding Bird Surveys** – As set out in the ES, approximately two thirds of the site's habitats will be lost during construction, of which trees, scrub and ruderal vegetation could be used by breeding birds. The proposed development will comprise the retention of open water, tree/woodland and grassland. These habitats would be further enhanced to increase their value for breeding birds, and landscaping would replace some of those lost habitats for example by tree planting and green roofs.

Disturbances, for example as a result of increased noise or vibrations during construction have the potential to result in displacement of breeding birds from the site whilst construction activities may result in harm or mortality to breeding birds through associated vegetation clearance.

As such, the ES Addendum considers that there could be a negative effect on breeding birds at a local level from habitat loss, disturbance and increased risk of mortality during construction. Any effects are considered to be of low magnitude however.

Standard construction mitigation should be adopted following best practice guidance, in particular avoiding vegetation clearance when birds are most likely to be nesting (between March and September), where possible. If this is not possible, then an ecologist who is experienced in searching for bird nests will be required to provide advice about how and when vegetation clearance should take place. Provided that mitigation measures are implemented, the ES Addendum considers that there would not be any residual effects on breeding birds.

### **Further Ecological Reporting – Otter Conservation Strategy**

This has been produced in order to avoid/reduce impacts on the local otter population. Mitigation is recommended as a precautionary approach, to protect otters in the event that construction activities occur outside of daylight hours, or that otter use any areas within closer proximity to the construction works for breeding/resting. It is also envisaged that the conservation strategy would form the basis for a European Protected Species Licence application for otters prior to any construction activities.

Mitigation measures have been recommended that should be employed during the construction and operational phases and suitable monitoring effort has also been detailed.

With these monitoring and mitigation measures in place, it is considered that the disturbance to otter through the proposed works and operational phases of the development would not affect the favourable conservation status of otters. Wetland planting and potential otter holt creation will enhance habitats on site for this species in the longer-term.

**Water Vole Method Statement** – In a similar manner to otters, this has been produced to avoid/reduce impacts on water vole population and suggests a number of mitigation measures during the construction and operational phases. Subject to the successful

monitoring results, these mitigation measures should minimise disturbance to water voles thus ensuring that their favourable conservation status is not adversely affected. Again wetland planting will enhance habitats for this species in the longer term.

**Statement to Inform Appropriate Assessment** – This SIAA was prepared to provide information to inform the Appropriate Assessment for the project in compliance with the requirements of the Conservation of Habitats and Species Regulations 2017. As the competent authority, it is the responsibility of LPA to undertake this Appropriate Assessment. This is discussed in more detail below when referring to the consultation response received from the Authority’s Planning Ecologist.

The detailed response from the Planning Ecologist confirms that the Ecologist has considered both the original ES and ES Addendum, and all relevant supporting reports that have informed these documents. The Planning Ecologist has confirmed that she is satisfied with the level of assessment made, the findings of the submitted assessments, and the ecological recommendations provided. In her professional opinion the recommendations meet the relevant ecological related planning policy objectives of the LDP, and comply with the requirements of the Environment Wales Act 2016. The consultation response recommends the imposition of a series of conditions on any planning permission granted.

As aforementioned, the application site is adjacent to the Carmarthen Bay and Estuaries SAC, Burry Inlet Special Protection Area and Ramsar site. As a competent authority under Regulation 63 of the Conservation of Habitats and Species Regulations 2017, the Council has to consider the impact of development on the features for which the aforementioned sites are designated. A Test of Likely Significant Effect (TLSE) and Appropriate Assessment (AA) have been done for the site, and have been sent to NRW for comment.

The TLSE states that the SIAA identifies the following potential impacts on the features of the CBEEMS:-

- Construction phase impacts on water quality by pollution run-off and contamination;
- Construction noise, and disturbance to Otter feature;
- Construction disturbance to SPA features;
- Habitat loss during construction;
- Habitat severance during construction;
- Disturbance/displacement to fauna (e.g. visual impact, noise, lighting and potential mortality/injury of individuals) during construction; and
- Impacts on water quality or air quality during construction;
- Habitat loss or disturbance during operation;
- Habitat severance during operation; and
- Disturbance/displacement to fauna (e.g. visual impact, noise, lighting and potential mortality/injury of individuals) during operation;
- Impacts on water quality or air quality during operation.

As the applicant has proposed mitigation measures specifically incorporated in the scheme that are likely to be necessary to remove the risk of significant effects, the TLSE concedes that an appropriate assessment is necessary for the project elements for which mitigation relates.

Therefore an AA has been undertaken to examine the implications of the proposal in view of the site’s conservation objectives.

The proposed development is located within 100m of the Carmarthen Bay and Estuaries Special Area of Conservation (SAC) and 300m from the Burry Inlet Special Protection Area (SPA) and Ramsar site. The AA lists in detail the reasons for the sites designations and relevant special features before undertaking a detailed assessment of the effects of the proposed development and consideration of restrictions and conditions that can be imposed on any planning permission granted. The assessment is addressed under the following sub headings:-

**Noise** – the AA opines that the standard construction management measures proposed to minimise the likelihood of significant disturbance to neighbouring properties can also minimise disturbance to ecological features. A condition should be imposed on any planning permission granted requiring a Construction Environmental Management Plan (CEMP) which will need to set out in detail the exact mitigation measures.

**Air Quality** – the AA opines that with the implementation of effective site specific mitigation measures the environmental effects in relation to dust will not be significant. These measures are also to be included within a CEMP.

In relation to NO<sub>x</sub> emissions, as the predicted concentrations both during construction and operational phases are below the annual mean objective, this impact is not considered to be significant and therefore no mitigation is required.

**Water Resources and Contamination** – In terms of pollution during construction the AA outlines the potential for sediment runoff and mobilisation of contaminants. It is noted that a buffer with the lake and river will be maintained. It goes on to states that the risk of sediment reaching the watercourses and of leakage or spillage of fuel, chemicals and other potentially polluting substances will be mitigated through good site practice and management, implemented in accordance with a CEMP to be agreed with the LPA. Storm water would only be discharged to the lake following appropriate treatment for removal of potential pollutants.

The AA also noted that the construction of the site will be phased, which in itself will help reduce the magnitude of impacts of potential spillages and silt washing into the surface water bodies and groundwater. Measures to control and prevent silt-laden runoff from entering water bodies will be implemented on site, whilst work, where possible will be avoided within the vicinity of the surface water bodies.

Following the incorporation of the proposed mitigation methods to be secured via the submission of a CEMP, the AA opines that the significance of construction stage impacts on the estuary is not considered significant.

In terms of pollution during operation, the AA re-iterates the fact that due to ground contamination, infiltration measures to deal with surface water is not an option due to the risk of mobilising contaminants. Therefore storm water will be transmitted to the lake via a dedicated drainage network. In order to control water quality it is proposed that filter drains, permeable paving and swales are used within the drainage network to reduce the risk of pollution. Other measures such as petrol interceptors will also be considered in accordance with pollution prevention guidelines. It is considered that following the incorporation of mitigation measures, including SUD's the significance of the effect on the water quality in the estuary during operation stage will remain moderate. A condition should be imposed on any planning permission granted requiring a final SUD's scheme.

With regards to foul water, the AA refers to the improvements works currently being undertaken by DCWW at Northumberland Pumping Station, and the further measures proposed as part of the development to avoid upstream sewer flooding. Conditions will be imposed on any planning permission granted in relation these improvement works, whilst the AA also refers to the fact that the proposed development complies with the requirements of the CBEEMS MoU.

In relation to ground contamination and groundwater, the AA outlines the potential risk to disturb and mobilise contamination present within the made ground and groundwater by introducing preferential pathways. Following further ground investigations and groundwater risk assessments at the site as the scheme progresses in more detail, mitigation measures may be required in this respect. The requirement to undertake further investigative works, and if considered necessary produce remedial and verification proposals, will be secured via conditions.

**Ecology** – the AA focusses upon impacts on Otter, Wintering Birds and certain Fish, all of which are qualifying features of the European protected site.

In terms of Otter, whilst no evidence of otters was found during the course of the 2016 surveys, the lake was identified as having high potential. A subsequent survey in December 2017 found numerous signs of otter activity around the lake. Whilst the central island has been assessed as having potential to support otter holts/laying up areas, the field survey signs do not suggest frequent use by otter.

The site has habitat connectivity with the SAC, for which otter are a qualifying feature and therefore any individual otters occurring within the site may be associated with populations of the SAC, however the AA acknowledges that there are limited opportunities on site to support permanent/temporary resting places. Therefore otters are likely to be using the waterbody for foraging and commuting, and potentially resting. As the proposed development will entail the development of the waterbody margins, specifically for the creation of paths around the lake, a new bridge across the lake possibly via the island and new drainage outfalls, it is possible that there would be a loss of otter habitat.

During construction it is considered possible that there would be a significant effect on otter from habitat loss and fragmentation and disturbance. Any such effects however will be temporary in nature and intermittent due to replacement and enhancements of habitats within the site post development. During operation there is potential for disturbance to otter in terms of visual (enhanced recreation use), lighting and noise.

The AA goes on to acknowledge that a number of measures are built into the proposed development, which will avoid or reduce potential impacts to ecological receptors including SAC and SPA features such as otter. A number of these will be secured via relevant conditions whilst further consideration in terms of design will be given at subsequent reserved matters stages. To list a few these include:-

- The integration of existing ecological features including waterbodies, grassland, woodland, trees and scrub into the development. The area to the north of the lake for instance will retain existing habitats and will be enhanced further to increase biodiversity.
- Enhanced landscaping including wetland planting will improve ecological connectivity particularly for mobile species such as otter.



- Restricted working hours during construction phases.
- Requirement to provide lighting designs and associated plans.
- Requirement to undertake a pre-construction otter survey.
- Requirement to fence off retained habitats.
- Requirement to provide an Ecological Management Plan which should detail the results of survey work, mitigation measures, management of retained and newly created habitats and post development monitoring.

In terms of wintering birds, the AA states that habitats within the site such as the waterbody and surrounding grassland are considered to have potential for the qualifying bird species. These habitats will be retained as part of the proposed development site and further enhanced to increase their value for biodiversity.

There could be potential acoustic, visual and vibration disturbances to overwintering bird species during construction whilst there is also potential for disturbance during operation. The results of the 2017/2018 wintering bird surveys and the proposed mitigation measures have already been outlined above, and these are referred to in the AA. Whilst the survey indicates that supporting habitats listed for the feature species do not occur within the site boundary, low numbers of the relevant bird's species may be using the lake as a resting area.

Finally in terms of qualifying fish, the AA acknowledges that the site is not considered likely to support any of these species however potential pathways for effect exist between construction activities and the SAC features. The distance from the proposed development to the SAC is however sufficient to ensure no effects on any of the qualifying fish species from acoustic or vibration disturbances. The only potential impact on fish are water quality related which has already been addressed above.

The AA addresses the points raised in NRW's response to the application thus far, whereby reference is made to a recent meeting that was held with NRW to discuss these matters. Following discussions it was agreed that due to the indicative nature of the masterplan and considering the planning application is outline with all matters reserved, a number of conditions could be applied to the consent to ensure no significant effects on otter as part of the scheme and address the concerns outlined above. These conditions are listed in the AA and are to be agreed as part of the consultation with NRW on it.

The AA sets out in detail the monitoring and reporting procedures, a number of which have already been referred to above and will be secured via conditions. This covers pre-construction, during construction and post construction monitoring and the subsequent reporting of such monitoring. During construction for example an Ecological Clerk of Works is recommended.

The AA concludes that the proposed development will not have a significant effect on the Carmarthen Bay and Estuaries European Marine Site (CBEEMS) which collectively comprises the Carmarthen Bay and Estuaries Special Area of Conservation, Carmarthen Bay Special Protection Area and the Burry Inlet Special Protection Area & Ramsar Site, as the proposal is not likely to undermine the area's conservation objectives.

The conclusion of this assessment acknowledges that while potential adverse effects were identified these can be mitigated for by adopting the measures detailed in the AA and secured via planning conditions.

The TLSE and AA were sent to NRW for consideration and comment on the 3<sup>rd</sup> December, 2018, giving them a 21 day period to respond.

Therefore to summarise, numerous detailed surveys have been undertaken to inform the original ES and subsequent ES Addendum. The reports conclude that subject to appropriate mitigation there will be no residual impact on identified ecological receptors. The reports also propose a series of ecological enhancement measures. The recommendations made in these reports will be secured via appropriately worded conditions and progressed further as part of detailed design.

The Authority's Planning Ecologist has confirmed that she is satisfied with the level of assessments made, the findings of the reports and ecological recommendations. On this basis she is satisfied that the proposals comply with relevant LDP policies and the requirements introduced as part of the Environment Wales Act.

The information submitted with the application has enabled the Planning Ecologist to undertake a TLSE in the first instance, which has been escalated to an AA due to the fact that mitigation measures were proposed. The detailed AA concludes that there is no significant effect on the CBEEMS provided that the mitigation measures proposed are agreed and secured. The LPA awaits NRW's formal response to the AA.

## **Archaeology and Cultural Heritage**

This chapter of the ES has been informed by a Heritage Desk Based Assessment and supplemented by a walkover survey. The scope of the Assessment was agreed with the Authority's Archaeological Advisors, Dyfed Archaeological Trust whereby a study area of 1km from site boundaries was agreed.

The chapter acknowledges that the majority of new build development proposed is focussed to the south of the lake where historic built form would also have been located. Whilst this increases the likelihood of impacts upon recorded historic assets, it reduces the likelihood of impacts upon currently unrecorded historic assets.

The approach taken in the ES to assess impact on heritage assets, archaeology and cultural heritage is a three staged approach which determines the importance of the heritage asset, the level of impact and significance of effect. The ES states that significant effects of archaeology and cultural heritage can often be appropriately mitigated.

The baseline study undertaken establishes that the site comprised part of the Llanelli Marshes throughout the later prehistoric, Roman, early medieval, medieval and earlier post-medieval periods. In the early to mid-19th century, the Llanelli Marshes were reclaimed for agriculture and industry. In the late 19th century industrial development was intensified and the site developed into New Dock and its associated shipping channel and scouring basin; the South Wales Steel and Tinplate Works; the Brickfield Chemical Works; a network of rail tracks and other supporting infrastructure; and two rows of workers' terraced housing.

Historic aerial photographs and documentary records demonstrate that most industrial activity within the application site had ceased, and the majority of the buildings demolished

and New Dock infilled, by 1961. The few remaining buildings within the application site had been cleared by 1991 and the shipping channel had been transformed into a lake by 1996.

The heritage assessment identified 13 registered historic assets within the application site. Only three of these (the shipping channel of New Dock, the scouring basin, and the Richard Thomas Wharf) have any surface expression. The shipping channel comprises a lake. The scouring basin is represented by a remnant channel of the New Dafen River and a stone wall of its former sluice. The wharf survives as a section of stone wall.

There are anticipated to be buried structural remains from the former industrial period as evidenced in previous archaeological reports undertaken on the site, however these are likely to be covered by significant made ground. There is also some potential for buried archaeological remains of prehistoric and pre-industrial historic activity to be preserved within deeper alluvial and peat deposits across the application site.

There are no scheduled assets or listed buildings within the application site but there are nine designated historic assets within the wider 1km study area.

The ES states that any remains within the site are anticipated to comprise non designated historic assets of limited significance (i.e. low to medium value). The remains would contribute to understandings of historic industrial activity within the application site; but are unlikely to warrant preservation in situ.

Excavation for building foundations and groundworks for services and landscaping will remove and/or truncate buried structural remains. Prior to and during construction assets would be recorded and, due to the low value of these non-designated assets it is considered that there would be no significant effect.

The completed development would not damage buried structural or archaeological remains and will not alter the physical fabric or key elements of the setting of any designated historic asset within the study area or wider landscape.

With respect to this topic, as part of the planning application process the LPA has consulted with Cadw, Dyfed Archaeological Trust and the Authority's own Building Conservation Officer. Whilst no response has been received from the latter, Cadw has advised that their records show that there are no scheduled monuments or registered historic parks and gardens within the vicinity of the proposed development. As such Cadw have no comments to make on the proposed development.

Dyfed Archaeological Trust advise that the proposed development site is located within an area of archaeological potential both for preserved palaeoenvironmental deposits and remains of 19<sup>th</sup> century industrial activity.

DAT concur with the findings of the Heritage Desk Based Assessment which suggests that the impact on buried 19<sup>th</sup> century structural remains and exposed wetland deposits can be mitigated through an appropriate programme of archaeological investigation and mitigation. Therefore in this respect DAT recommends that an archaeological condition requiring a Written Scheme of Investigation in line with advice in PPW and TAN24 is imposed on any planning permission granted. The imposition of such a condition aims to protect the historic environment interests whilst enabling development.

## **Landscape and Visual Impact**

The ES states that effects on landscape and visual receptors are closely related but separately assessed. Landscape assessment looks at the characteristics of the landscape and the overall character of the landscape, whilst a visual assessment looks at how the proposals may affect views and the visual amenity of people. The Landscape and Visual Impact Assessment (LVIA) that has informed this Chapter of the ES has looked at effects during the construction phase, during the early stages of operation when landscaping measures have not yet had a chance to mature and during the 15th year after opening when the landscaping would be mature.

The scope and extents of the LVIA was agreed with the LPA's Landscape Officer as part of Environmental Impact Assessment Scoping Opinion procedure.

In order to establish baseline conditions the study area has been informed by understanding the extent of the Zone of Theoretical Visibility (ZTV). As a result of the analysis of visibility within the surrounding landscape, the study area was set at 5km.

All landscape character assessments in Wales start with reference to LANDMAP, the most detailed landscape evidence baseline.

Visual receptors are people enjoying views from locations from which it is possible to obtain views of the proposed LWLV. Such locations include both private and public viewpoints i.e. Public Rights of Way.

The assessment is based on a worst case scenario in terms of visibility.

The Landscape baseline position has established that there are no international landscape designations relating to the application site or its immediate surroundings. The application site does not lie within any area which is nationally designated for its landscape value or historical and cultural value. The Gower Area of Outstanding Natural Beauty (AONB), is sited approximately 2km to the south in the Llanrhidian Sands of the River Loughor. The long-distance Wales Coast Path passes directly past the scheme at the mouth of the New Dafen River. There are no cultural or heritage designations in close enough proximity to the site to be affected. The Carmarthen Bay and Estuaries Special Landscape Area (SLA) is just within the northwest extents of the 3km Study Area.

In terms of landscape character the proposed development lies within Natural Resources Wales (NRW) National Landscape Character Area 38 'Swansea Bay'. The description of this area as set out in the ES chapter refers to both the urban and historic heavily industrialised area of Llanelli, whilst reference is also made to the adjacent Millennium Coastal Park (MCP) and wildlife reserve.

Reference is drawn to a number of relevant LANDMAP designations for the area which vary from the Llanelli Visual and Sensory aspect area, which the ES considers to have a low sensitivity to change, to the MCP, National Wetland Centre and Loughor Estuary which are more susceptible to change.

The value of the Gower AONB and Carmarthen Bay and Estuaries SLA are considered to be High. These areas have a high susceptibility to change and therefore their sensitivity is assessed as High.

In terms of visual receptor baseline position, the site is largely flat or very gently sloping with few topographical features, having being previously cleared for development. Long, medium and short distance open views are afforded towards the site from the south and west. Whilst from the north and east the site is visually more contained due to the existing screening vegetation and built environment. The ES identifies recreational, transport, residential, business and heritage receptors. The desktop study and field work identified the selection of seven viewpoints (Vps) to represent visual receptors with the potential to be significantly affected by the proposed development.

In terms of landscape effects, during construction, it was assessed that there would be significant landscape effects on a number of defined landscape receptors which included:

- Loughor Estuary;
- Gower Area of Outstanding Natural Beauty (AONB);
- Carmarthen Bay and Estuaries Special Landscape Areas (SLA); and
- Millennium Coastal Park.

With regards to visual receptors due to their proximity to construction activity and their high sensitivity, the following visual receptors would receive substantial and/or moderate adverse and significant effects. These include:

- Recreational: users along Wales Coast Path, Millennium Coastal Park & National Cycle Route 4;
- Transport: Road users on the B4304; and
- Residential: two storey detached houses along the northern boundary of Pentre Nicklaus Village, new development of terrace houses along The Avenue (B4304) and existing houses at the end of New Dock St, a group of two storey terrace houses along Caswell St. and blocks of four storey apartments at the southern boundary of Llanelli North Dock (Traeth Ffordd).

All other visual receptors would receive insignificant effects from construction, ranging from negligible to slight and slight to moderate adverse.

It must be acknowledged that construction works however are temporary, reversible and intermittent.

In terms of operational landscape effects, the planning application is only in outline form at this stage and therefore the LPA has control over scale, detailed design and landscaping at reserved matters to ensure that the scheme is sympathetic to landscape character and acceptable in terms of visual impact. Nevertheless, indicative scale parameters indicate that building heights will vary across the development. Whilst the Wellness Hub will have a significant height serving as a landmark feature, the heights and massing of other development will reduce towards the site boundaries.

A detailed landscaping scheme will be proposed and agreed at reserved matters which will soften the visual impact of the proposed development.

Once the site is fully operational and the landscaping measures have had a chance to fully mature, the ES states that the only remaining significant effect would be on the Millennium Coastal Park which will directly affect a small section at the edge of this landscape character

area. Changes will include loss of the open and exposed character of the site and a reduction in tranquillity and recreational value.

With regards to operational visual effects, due to their proximity to construction activity and their high sensitivity, the ES states that the following visual receptors would receive significant effects at Year 1:

- **Recreational:** users along Wales Coast Path, Millennium Coastal Park & National Cycle Route 4;
- **Transport:** Road users on the B4304;
- **Residential:** 2 storey detached houses along the northern boundary of Pentre Nicklaus Village;
- **Residential:** New development of terrace houses along The Avenue (B4304) and existing houses at the end of New Dock St.;
- **Residential:** Group of two storey terrace houses along Caswell St.;
- **Residential:** blocks of 4 storey apartments at the southern boundary of Llanelli North Dock (Traeth Ffordd);
- **Recreational:** users along Wales Coast Path, Millennium Coastal Park & National Cycle Route 4.

All other visual receptors would receive insignificant effects from construction, ranging from negligible to slight and slight to moderate adverse.

Due to the proposed mitigation measures outlined below, the ES states that the following visual receptors would receive significant residual effects at Year 15:

- **Recreational:** users along Wales Coast Path, Millennium Coastal Park & National Cycle Route 4;
- **Transport:** Road users on the B4304;
- **Residential:** New development of terrace houses along The Avenue (B4304) and existing houses at the end of New Dock St.

All other visual receptors would receive insignificant residual effects at Year 15, ranging from negligible to slight and slight to moderate adverse.

Landscape mitigation measures designed into the proposed development to reduce landscape and visual effects include replacement planting using native species, areas of reeds and other wetland planting, new woodland and hedgerows along the site's perimeter and re-use of surplus excavated material won from site to create attractive and naturally undulating grassed landforms to improve visual amenity and provide more effective screening. The ES also advocates the use of green roofs to buildings and green car parks as much as possible to further soften the impact of the proposed development.

The landscape related information submitted with the application has been considered in detail by the Authority's Landscape Officer who has subsequently advised that the information submitted is sufficient to enable assessment of potential landscape impacts.

He goes to opine that there is sufficient scope within the proposed development to enable potential significant impacts to be avoided through effective landscape constraint analysis, and the development of appropriate detailed design proposals which minimise and mitigate for all potential impacts to existing landscape elements. The information submitted demonstrates the potential for effective delivery of relevant policy objectives subject to appropriate detailed design. In this respect it is reasonable that full assessment and approval can be deferred until reserved matters stage.

He concludes that the proposed development is acceptable in principle from a landscape perspective, subject to appropriate planning conditions being imposed on any outline approval covering information to be submitted and approved as part of reserved matters applications.

Natural Resources Wales has also provided comments in terms of landscaping. NRW has confirmed that they agree with the findings in Chapter 12 of the ES in that there would be significant landscape effects on the Gower AONB at construction, and that once operational and as landscaping measures mature, the effects on the AONB would reduce to insignificant. NRW also agree with the findings in Section 16.4.26, that there are unlikely to be significant cumulative effects on the Gower AONB.

NRW recommend that a Landscape and Ecological Management Plan is produced to ensure that the mitigating effects of the proposed planting would reduce adverse landscape and visual effects on the AONB to a minimum. Securing this via a suitably worded planning condition on any outline permission issued would be acceptable to NRW.

## **Socio-Economics**

The Chapter of the ES considers the potential direct and indirect effects of the proposed LWLV development for socio-economic receptors within a defined study area, including local residents, local businesses, and the local labour market. Effects are considered both during construction and once the proposed scheme is operational.

The focus of the assessment is on determining whether effects would change patterns of economic activity or affect social conditions within the study area.

Some key relevant baseline facts in this respect are as follows:-

- CCC has higher percentage of people over 65 and 85 than the Wales average.
- The Ageing Well Plan for CCC states that the population of the County aged over 75 is expected to increase by 80% between 2011 and 2036.
- Due to the projected increase in elderly population there is an increased requirement for residential care facilities.
- The South Llanelli wards have significantly lower rates of owner occupation and significantly higher proportion of households in social rented accommodation than CCC/Wales average.

- The Economic Regeneration Strategy for the City Region identifies that the region is underperforming economically, recording lower than average economic growth and experiencing a 'productivity gap' relative to Wales and the UK. In 2010, productivity was 94% of the Welsh level and 77% of the UK level. This is attributed largely to the loss, since 1990, of manufacturing employment, and the growth of employment in relatively low-value sectors and occupations.
- Employment levels across the City Region have fallen considerably since 2010, and economic activity is lower than the average for Wales and the UK. The latest data shows that, within Carmarthenshire, the rates of economic activity and employment are slightly above the average for Wales; however, unemployment is also marginally above average, at 5.0% compared with 4.9% for Wales and 4.7% across the UK.
- 2011 Census suggests that the south Llanelli wards record considerably higher levels of unemployment than either Carmarthenshire or Wales as a whole. In Glanymor, the unemployment rate in 2011 was 6.9%, and in Tyisha it was 7.5%. Data from 2017 shows that the proportion of residents claiming Jobseekers' Allowance is also above average in Glanymor and Tyisha.
- The Economic Regeneration Strategy for the Swansea Bay City Region identifies a major skill deficit across the City Region.
- The area to the south of Llanelli town centre forms part of the Carmarthenshire Communities First Area, and records relatively high levels of multiple deprivation. Several Lower Super Output Areas in this area fall within the 10% most deprived in Wales. LSOAs in the area also fall, variously, within the 10% most deprived in terms of income, employment, health, education, community safety, and physical environment deprivation.

The vision for the proposed LWLV is to benefit the local area by aligning employment, training and research opportunities with the improvement of health and wellbeing for people living in South Wales.

During construction the development will create significant opportunities for training and employment over the five year construction period which would bring a number of benefits to the local community. As a result of construction activities and the resulting combined air quality, noise and traffic effects, there are likely to be minor adverse amenity effects on local businesses and residents.

The ES estimates that 160 to 210 full time equivalent jobs will be created during construction with 100 to 140 of these retained within Carmarthenshire. This estimate is based upon the total capital cost of the scheme.

It is therefore considered that the construction of the proposed scheme will have a positive effect on the local labour market, by creating both direct employment and indirect employment in the local supply chain, and by providing opportunities for training and apprenticeships.

Once complete the development would offer significant benefits to local residents in terms of provision of assisted living dwellings, nursing care home and extra care facilities and also in terms of access to health, care and wellness services and leisure facilities. The provision



of recreational facilities including a brand new state of the art leisure centre for the local community would be beneficial although this would be upgrading existing facilities.

It is anticipated that job and training opportunities would be created across a range of sectors, and that research and development activity would generate new business activity, including for small and medium sized enterprises (SMEs). This represents a significant benefit for the local community in terms of both direct job creation and additional local income and local supplier purchases.

Whilst it has not been possible to quantify operational employment effects at this stage as a detailed breakdown of floorspace by use class is not available for all elements of the proposed development, only a qualitative assessment of operational employment has been provided in the ES. Nevertheless data presented by the applicant suggests that the proposed scheme could support between 1,500 and 1,800 jobs in total. It is likely that these jobs will include a range of opportunities, including clinical staff, care workers, teaching staff, front-of-house leisure staff, facilities management and maintenance, as well as technical, scientific and professional services roles.

The City Deal for the region includes a skills and talent initiative led by Carmarthenshire County Council which will support skills development across all 11 City Deal projects (including the LWLV). Training and educational opportunities will range from post-16 skills training through to undergraduate and postgraduate courses, and provision of Higher Education for healthcare professionals.

Alongside training and education for healthcare professionals, there will be a focus on working with local schools and colleges to create skills in the leisure, tourism, catering and hospitality sectors, to meet the needs of these sectors both within the Village itself and in the wider City Region.

Wider opportunities could include work experience placements and training opportunities for local people in health and social care.

It is likely that the provision of a broad range of education and training opportunities will provide substantial benefits for the local labour market, by addressing recognised staff shortages and meeting the needs of key sectors across the City Region, and by supporting skills development more broadly.

The proposed development will support a range of research and development activity, principally in the life science, health and information and communication technology (ICT) sectors.

The Institute of Life Sciences (ILS) will also provide business start-up and incubation space, as well as larger commercially available office, laboratory and clinic space. It is the intention that the ILS will function as a key enabler of economic development and employment creation, generating new business and supporting existing businesses, including SMEs, to grow locally.

It is therefore considered that the proposed scheme, once operational, will have a positive effect on the local labour market, by creating both direct employment and indirect employment across a broad range of employment sectors and skill levels.

In terms of mitigation and enhancement, during construction it is recommended that liaison with local partner organisations including education providers could help to ensure that construction jobs are targeted at existing unemployment and skill gaps, and identify opportunities to provide training and upskilling that will deliver a longer-term benefit to the local construction sector. This approach would help ensure that local and regional employment benefits from the construction of the proposed scheme are focussed and maximised as far as possible.

As there are no predicted adverse effects, there is no mitigation proposed during the operational phase.

The ES Chapter concludes that for socioeconomic receptors the proposed development will have **moderate beneficial** effects during both constructional and operational phases.

Whilst there are no relevant statutory consultation responses to refer to in respect of socio-economic implications, it is clear to see that both the City Region and County of Carmarthenshire presently face a number of socio-economic challenges. In fact, the Glanymor ward of Llanelli where this development is proposed is classed as one of the most deprived areas in Wales. The proposed development will provide significant jobs and other opportunities during the lengthy construction period, whilst positive spin offs to local businesses and supply chains will also occur during this period. When operational the proposal will create significant benefits in terms of job creation, improved skills, education and training opportunities, and significantly improved and enhanced facilities for the locality.

### **Health, Wellbeing and Recreation**

An assessment of health and wellbeing is a means of assessing the health and wellbeing consequences of a proposed project and to use this information to feed back into the design to maximise the associated positive and minimise the negative impacts of the proposal.

The assessment carried out for LWLV looked at various health determinants (i.e. environmental, social, economic and fixed factors such as age and genetic makeup) which influence health and well-being. The objectives of the assessment were to:-

- Identify any negative or positive population and health impacts of the proposed LWLV during construction and operation both on new residents and users of the facilities (workers, patients and recreational users) and on existing residents living close to the proposed development;
- Develop mitigation and enhancement measures that can be applied to the proposed LWLV (to be applied following planning consent) in order to minimise the negative and enhance the positive health and wellbeing impacts; and
- Identify possible indicators for monitoring and evaluating the actual health impacts during construction and operation.

The chapter states that there is no established or widely accepted framework for assessing the 'significant' health effects of a development proposal. The health significance of an environmental impact is typically a function of the 'magnitude' and 'duration' of the change to health determinants and the extent of the population exposed to this change. When considering the extent of the population, consideration also need be given to whether there are populations within the study area that are particularly vulnerable to health effects.

Assessment is made as to whether the effect on health determinants is direct or indirect; positive or negative; and permanent or temporary. This approach permits the assessment to provide a relative scale of effects in order to give a sense of the importance of the potential health effects.

The report outlines the criteria that have been used in order to define significance of effects.

The approach to the assessment of health impacts is generally qualitative.

Some key existing community and health profiles are as follows:-

- As aforementioned in the preceding socio economic section of this report the County of Carmarthenshire has an ageing population with the percentage of households in older age groups exceeding the Welsh average.
- The Swansea Bay City Region is underperforming economically, recording lower than average economic growth and experiencing a 'productivity gap' relative to Wales and the UK.
- The South Llanelli wards record considerably higher levels of unemployment than either Carmarthenshire or Wales as a whole.
- Residents in Carmarthenshire have high rates of self-reported good, or very good health. Indicators of health related lifestyle show that overall people are generally leading healthier lifestyles than people across the whole of Wales. The exception to this is level of obesity which are higher than the Wales average. Childhood obesity within the region has increased in recent years with 30.7% of 4-5 year olds being overweight or obese.
- Carmarthenshire has a higher rate of cardiovascular disease, coronary heart disease and deaths from stroke than the Wales average. However, mortality rates are similar in Carmarthenshire to the rest of Wales.
- Older people; low income/low socioeconomic groups; people with disabilities; and those with long term illness/care needs are particularly vulnerable to health effects from the community and health profiles.

The assessment of effects considers each of the determinants of health during both construction and operational phases. The key outcomes are as follows:-

- Housing quality and design – during the construction phase no existing housing will be demolished or adversely affected. The operational phase will result in a positive impact in this respect as a key aspect of the LWLV is to provide a range of housing to satisfy various healthcare needs.
- Access to healthcare services and other social infrastructure – during the construction phase access to existing social infrastructure will not change therefore there will be no effect. The operational phase will result in long term major beneficial effects as access to health care services, community health facilities and recreational opportunities will be vastly improved.

- Access to open space and nature – during the construction phase there will be a short term negative minor effect by stopping up or diverting existing walking routes albeit the development will be phased allowing some parts of the site to remain open. When completed and operational, the quality and accessibility to open space will be vastly improved. The landscape will be enhanced, especially to the northern side of the lake, more choice will be available and it will be accessible to all. It is therefore envisaged that there will be a long term, beneficial and moderate effect.
- Air quality, noise and neighbourhood activity – this looks at the combined effects of noise, air emissions, traffic and visual impacts on the quality and amenity of the local environment and therefore cross references with other Chapters of the ES in this respect. During the construction phase it concludes that the combined effects from noise, air and landscape effects, i.e. overall amenity effects, are considered to be short term, moderate adverse effects. When operational the effect on amenity as a result of combined air, noise, landscape and visual effects is considered to be less than those experienced during the construction phase. However, they do remain as long-term, minor adverse effects.
- Accessibility and active travel – during the construction phase, access to public transport will not be effected and therefore the effect in this respect will be neutral. In terms of active travel (walking, cycling) there will be a short term minor adverse effect as increased vehicle movements may discourage people to use active travel. When operational the scheme is looking to improve public transport links by locating bus stops within the scheme. There will be a range of active travel opportunities with increased connectivity, pathways and enhanced recreational space. The operational phase effects are assessed to be long term, minor and beneficial.
- Crime reduction and community safety - During the construction phase it is considered that there would be no changes to any crime rates or to community safety as the site would initially be fenced off from public access and site security would be in place. Despite this, fear of crime may persist due to perceptions about construction sites, and the presence of hoarding, footpath diversions etc. This is assessed as having a short term, minor, negative effect. When operational, Residents of LWLV would predominantly be older people who feel more vulnerable to crime, or other vulnerable people within the community (e.g. those with learning disabilities) who may be at greater risk to being victims of crime. It is likely that the fear of crime experienced by residents of LWLV would reduce due to the assisted living nature of the development. Psychologically this would help residents, but it also likely to act as a physical deterrent to crime due to the added security this provides residents. This is assessed as having a long term, minor, beneficial effect.
- Access to healthy food - No effects on access to healthy foods have been identified for the construction phase. When operational the assisted living/care home element of the proposed LWLV would increase the likelihood that residents (older people and people with long-term limiting illness) have access to health and nutritious food. It is considered that this would represent a long term, moderate beneficial effect for these people. Community health programmes to be run from within the development will also promote healthy eating.
- Access to work and training – being in employment is generally expected to be positive in health terms, and training is a form of work to improve chances of employment and career progression. With this in mind the creation of new job opportunities during the

construction phase of the proposed development would have a positive effect on health and wellbeing for those that secure jobs. However, it is not considered that the health benefits from this would be much more than a neutral effect. The health benefits from job creation during operation are likely to be similar to those of the construction phase, but more long term. Whilst many of the jobs are likely to require specialist skills which may need to be imported from outside the study area, there would also be opportunities for other roles within the care homes, leisure facilities and community space that would be easier to fill from the local community. This would bring long term, beneficial health effects.

- Social cohesion and lifetime neighbourhoods – The development site does not currently have a function in social cohesion or in the contribution to lifetime neighbourhoods and therefore the construction phase is not predicted to have any effect on this determinant of health. There may be a short term, minor adverse effect on new residents in the early phases as construction activities continue. Once complete, the proposed LWLV may offer opportunities for people within the wider community to use these facilities for community based activities such as sports and training. The enhanced physical environment will also contribute towards improved social cohesion. The assessment identifies that there is likely to be an overall minor beneficial effect on the social cohesion and lifetime neighbourhoods' health determinant.
- Use of resources – During construction there is no demolition required so there will be no waste disposal from demolition. In terms of general construction waste, it is assumed that best practices would be followed to maximise resource use efficiency, thereby minimising resource use, minimising waste generation and maximising recycling. A neutral effect is therefore anticipated as a result from changes to use of resources. During operation of the proposed LWLV it is anticipated that a waste management plan would be implemented to deal with waste from across the site. It is not anticipated that the vehicle movements from such waste management operations would be significantly higher than expected for such developments and therefore a neutral effect is predicted.
- Climate change – It is anticipated that the construction phase would result in the emission of 57.0 ktCO<sub>2</sub>-e of greenhouse gas emissions. This represents 4.7% of the annual emissions from Carmarthenshire local authority area. It is considered that this is not likely to result in any effects on health. Due to the outline nature of the proposal, it is not yet possible to state what the energy strategy for the buildings and facilities would be. Whilst materials are yet to be fixed building techniques will need to accord with relevant Building Regulations. In the first year of operation (2023), the annual emissions will be 9.8 ktCO<sub>2</sub>-e, equivalent to 0.8% of the annual emissions from the Carmarthenshire local authority. It is considered that this would not result in any health effects.

According to the matrix diagrams included within the ES, the operational phase impacts are largely positive in terms of health, wellbeing and recreation.

However as the assessment has identified both positive and adverse impacts in terms of health and wellbeing of the local population, the ES proposes a number of mitigation and enhancement measures which include:-

- Housing quality and design - An assessment of health and care needs within the catchment for the development should be carried out in order to identify specialist care and assisted living needs that may be required.

- Access to healthcare services and social infrastructure - Community facilities should be made available on an equitable basis to all sectors of the community.
- Access to open space and nature – during construction where footpaths are closed alternative routes should be identified. The design of open space should be inclusive to all.
- Air quality – Construction Environmental Management Plan to be prepared which includes measures for managing dust and emissions.
- Noise – Building insulation measures to reduce the impact from construction and traffic noise for residents that move in during early phases.
- Accessibility and active travel – construction traffic to be routed away from existing pedestrian routes. New public transport, and active travel opportunities to be introduced.
- Crime reduction and community safety – design to include good lighting, clear lines of sight, passive surveillance and cctv.
- Access to healthy food - Community services being considered for the site should be reviewed in order to integrate healthy eating options.
- Access to work and training - Training for jobs could be targeted within the local community to enhance employment take up from within the local community. Links to universities, local colleges and job centres should be encouraged.
- Social cohesion - The developing landscape strategy should seek to enhance connectivity and creation of place both within the site and at the interface to the surrounding area.
- Use of resources - It is recommended that a waste management plan for the site be prepared and implemented in order to maximise recycling rates.
- Climate change - Building design should consider climate change resilience.

Whilst there are no relevant statutory consultation responses in terms of health and wellbeing, this Chapter of ES cross references with many others and therefore some of the consultation responses already mentioned in this report are of relevance. Whilst some negative impacts have been identified, primarily during the construction phase, such impacts are short lived whilst the ES proposes a number of mitigation and enhancement measures in this respect.

No significant adverse effects were identified. When operational, the LWLV project would result in a number of significant benefits for improving the health of the community. These include improving housing quality and design, increasing access to healthcare services and other social infrastructure (including education), improving access to open space and nature, improving access to healthy food (particularly for long term sick and people with physical / learning difficulties) and improving access to work and training.

In addition to this Chapter of the ES, the applicant themselves have undertaken a separate Health Impact Assessment in line with the requirements on public bodies of the Public Health Wales Act (2017). Whilst separate to the ES, such an Assessment will be closely aligned.

## Climate Change

This chapter of the Environmental Statement provides the context, baseline data, methodology and approach, assessment results and mitigation measures for the three assessments under the climate change topic namely:

- Greenhouse gas (GHG) emissions assessment;
- Climate change resilience (CCR) assessment;
- In-combination climate change impact (ICCI) assessment.

In terms of the baseline environment, as the site is currently undeveloped there are no greenhouse gas emissions at present. With regards to current climate conditions, the ES states that Llanelli has historically been affected by flooding as a result of extreme rainfall events, whilst the predicted future climate conditions for Llanelli appear to be similar to that of the rest of the country with warmer/drier summers, wetter winters and increased potential for extreme weather events expected.

The Greenhouse Gas Assessment quantifies the potential GHG emissions associated with the construction and operation of the proposed development and identifies mitigation measures to reduce these emissions. In this respect the GHG assessment identified a potential average increase of 0.9% of the annual emissions from the local authority area during the five-year construction period and an increase equivalent to 0.8% of the annual emissions from the Carmarthenshire local authority area during operation.

The measures proposed to mitigate the impact of GHG emissions from the construction phase include reducing quantity of materials through good design; implementing the principles of designing out waste; selecting more sustainable materials; and using local suppliers. During operation a number of design related mitigation measures are proposed to mitigate the impact of GHG including sustainable and energy efficient design of buildings; use of durable and low maintenance materials; install renewable energy generators; and develop strategies to encourage sustainable modes of transport.

The Climate Change Resilience (CCR) assessment evaluates the effectiveness and feasibility of adaptation measures integrated into the proposed development to avoid or reduce hazards and / or increase resilience of the proposed development to climate change impacts. In this regard, the CCR assessment did not identify any significant risks associated with climate change. This is particularly a result of mitigation being built in to the designs, for example designing drainage capacity to be able to deal with extreme flood events that may occur in the future.

The in-combination Climate Change Impact (ICCI) assessment evaluates the combined effect of the proposed development and potential climate change impacts on the receiving environment during construction and operation. The ICCI assessment did not identify any significant effects.

Due to the uncertainties involved in adapting to future climate change, the ES recommends that a pathways approach is adopted for monitoring and managing climate risks into the future. Further measures to reduce climate risks over the long-term, other than the mitigation measures outlined in this and other environmental topic sections of the ES, are not currently recommended for implementation as they may result in maladaptive outcomes that limit future adaptation options.

The LPA has not drawn reference to any specific consultee responses in this section of the report, however responses received from consultees and referred to in other sections of the report are relevant e.g. NRW's response to flood risk.

## **Cumulative Effects**

In accordance with the EIA Regulations, the final chapter of the ES provides an assessment of the cumulative effects arising from the proposed development in combination with the enabling schemes and other reasonably foreseeable projects in the local area.

The Zone of Influence (ZOI) refers to the spatial area over which an effect from a project is likely to be experienced. The ZOI for the proposed LWLV varies for each environmental topic listed within the ES. For example the potential impact in terms of noise and biodiversity will be relatively localised in comparison to the socio-economic and health and wellbeing impacts which are likely to be county wide.

The list of other projects considered within the cumulative effects assessment has been obtained through consultation with the LPA and through desktop research. The list primarily mirrors the developments that have been included within the traffic model for the scheme.

The chapter discusses the cumulative effects for each environmental topic within the ES in relation to the relevant Cumulative Developments. Consideration is given to both cumulative construction and cumulative operational effects. Any proposed mitigation is also set out.

**Socio-economic** – during construction works, the size of the workforce locally and the strong links that Llanelli has with neighbouring labour markets, will reduce the potential for cumulative effects in relation to workforce demand and displacement if projects were to coincide.

The traffic, noise and vibration, and air quality assessments indicate that there is the potential for cumulative effects on amenity for local businesses and residents during construction. The preceding sections of the report have recommended mitigation measures where relevant in this respect.

The ES states that there may be the potential for some cumulative benefits from the combined construction workforce, associated with direct employment and training opportunities, and indirect effects such as workforce expenditure and additional local income.

Once the cumulative developments are operational, there may also be the potential for cumulative benefits in terms of access to opportunities for leisure and recreation for local residents, particularly in relation to the Machynys Eco Park development.

**Traffic** – The Transport Assessment referred to in the traffic section of this report has already considered the cumulative impacts of other committed developments in the locality.

**Noise and Vibration** - None of the cumulative developments are within the noise impact zone of influence of 600m for the assessment of construction effects. Due to the distance of the cumulative developments, no cumulative effects from construction site noise or vibration are expected to arise.



The cumulative road traffic noise effects when operational have already been addressed in the preceding section on noise and are concluded to be not significant.

**Air Quality** - None of the cumulative developments are within the air quality zone of influence of 350m for the assessment of construction effects. Due to the distance of the cumulative developments, no cumulative effects during construction are expected to arise.

The traffic associated with the cumulative developments when operational has been included in the traffic data used in the air quality assessment of future year scenarios. Therefore, cumulative air quality effects arising from traffic have already been assessed in earlier sections of this report.

**Water Resources** - Except for the proposed LWLV development none of the cumulative developments are expected to drain into the New Dafen River therefore if a pollution incident occurred on site it is expected that no cumulative effect would be anticipated on the river itself.

An FCA has been undertaken and it is expected that the proposed development will not cause detriment to other surrounding properties. It is expected that the other developments will only be permitted if the flood risk is managed and they do not cause detriment to other properties. Therefore, it is expected that no cumulative effect would arise in conjunction with the proposed development.

The foul water drainage of the proposed development will only be permitted to connect into DCWW's Northumberland PS when sufficient capacity is confirmed, whilst a surface water removal scheme within the catchment has been undertaken. It is expected that the other developments will only be permitted if there is sufficient capacity and appropriate compensation measures are agreed to reduce surface water flows into the network. Therefore, providing such measures are implemented, it is expected that no cumulative effect would arise in conjunction with the proposed development.

**Ground Conditions** - The cumulative developments are outside of the 300m radius for the assessment of construction effects to ground conditions. Due to the distance of the cumulative developments, no cumulative effects during construction are expected to arise and impact ground conditions at the site.

**Biodiversity** - Based on the existing knowledge on ecological receptors identified within the site, cumulative impacts are not considered likely to raise the levels of the predicted impacts within the existing ES ecology chapter.

**Archaeology and Cultural Heritage** - The proposed development will adversely impact upon archaeological remains within the site. Further potential archaeological remains are indicated within the footprint of these cumulative schemes, but there is no clear association between the archaeological remains within the site and those within the cumulative schemes. As such, no cumulative effects have been identified in this regard.

The proposed development results in no harm to the significance of designated historic assets through changes to their setting. As such, harm to the significance of such assets through any of the above schemes will derive from that development alone, and no cumulative effect would arise in conjunction with the proposed development.

**Landscape and Visual** - The cumulative assessment that has been carried for the proposed development considers the other developments agreed upon. Only the cumulative visual effects from the Machynys Hotel (S/22567) and the proposed LWLV are assessed as being significant adverse. The other developments considered are more distant from the application site.

**Health and Wellbeing** – Health and well-being effects from the cumulative developments have not been assessed. However, the effects from developments that are relatively close to the proposed LWLV are likely to have similar effects to those outlined in the health and wellbeing assessment chapter. For this reason, should the developments be constructed at the same time as LWLV, it is likely that the effects noted would be intensified. This is also likely to be the case once all developments have been completed.

**Climate** - There is no information available on the anticipated climate change impacts of the cumulative developments. Strategies to reduce greenhouse gas (GHG) emissions are outlined in the Seaside Primary School DAS. The cumulative developments are of a smaller scale than the proposed LWLV.

A threshold for significance has not been defined in the GHG assessment, as any carbon emissions associated with the proposed development can be deemed significant. Based on the scale of the proposed developments it can be estimated that they would cumulatively contribute GHG emissions of the same order of magnitude as the proposed LWLV. As noted by IEMA, 'the GHG emissions from all projects will contribute to climate change; the largest interrelated cumulative environmental effect

No significant cumulative impacts have been identified from a climate change risk (CCR) or in-combination climate impacts (ICCI) perspective.

Therefore the ES concludes that there is no significant cumulative effect associated with the proposed development.

Following detailed consideration of the supporting documents and review of responses received from relevant consultees, the LPA agrees with the above conclusions of the ES. Mitigation measures proposed, where relevant will reduce the impact of the proposed development. Other developments that may come forward in the area in future will implement their own good practice and mitigation measures where necessary to avoid any potential cumulative impact.

## **ALIGNMENT WITH NATIONAL AND STRATEGIC OBJECTIVES**

### **Well-being of Future Generations Act (2015)**

The Well-being of Future Generations Act (Wales) 2015 imposes a duty on public bodies to carry out sustainable development.

The sustainable development principle is:

*'... the public body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.'*

The Act deals with improving the social, economic, environmental and cultural well-being of Wales with an overarching aim of creating a Wales we all want to live in, now and in the future. In this respect the Act sets out the following 5 ways of working:-

5 Ways of Working in the Act are:-

- Prevention;
- Integration;
- Involvement;
- Collaboration;
- Long Term.

And puts in place the following 7 well-being goals:-

- A prosperous Wales;
- A resilient Wales;
- A healthier Wales;
- A more equal Wales;
- A Wales of cohesive communities;
- A Wales of vibrant culture and thriving Welsh language, and
- A globally responsible Wales.

The proposed development represents a true multi agency and multi sectoral approach, which is well aligned with the collaborative aims of the Act. Community involvement has been encouraged throughout, whereby in advance of the formal Pre-Application Consultation process the applicant held a public exhibition to invite community comments. The scheme focusses on integrating services on one site, with the aim to improve health and well-being in the longer term and prevent hospital admissions. As such the LPA considers that the proposal accords with the 5 ways of working required in the Act.

The LWLV will offer a broad range of employment, training and education opportunities within both the locality itself and regionally. Health and well-being are at the heart of the proposals, and the scheme will offer a breadth of opportunity for sports, recreation and community engagement. The focus on a landscape led scheme will also provide opportunities to mitigate and enhance biodiversity interest. The LPA therefore considers that the proposed development will have social/cultural, environmental and economic benefits that align with the 7 well-being goals of the Act.

In order to comply with the requirements of WFGA (2015), Carmarthenshire County Council has set the following 14 Well-being objectives, which CCC must take all reasonable steps to meet:-

- 1 Best start in life;
- 2 Healthy children;
- 3 Improve learner attainment;
- 4 Reduce not in education, training or employment;
- 5 Tackle poverty;
- 6 More jobs and growth;
- 7 Affordable homes;
- 8 Help adults live healthy lives;
- 9 Support families and communities;
- 10 Support older people's dignity and independence;

- 11 County wide approach to Ageing Well;
- 12 Looking after the environment now and in the future;
- 13 Improving the highway and transportation infrastructure and connectivity;
- 14 Welsh Language and Culture.

These objectives place a lot of emphasis upon health, education/employment, supporting communities and the environment, which as aforementioned the LPA considers that the LWLV will positively contribute towards.

In light of the above, the LPA considers that the proposed development fully aligns with the requirements of the Well-being of Future Generations Act (2015).

### **The Environment Act (2016)**

The Environment (Wales) Act 2016 received Royal Assent in March 2016 and has been designed to complement the Wellbeing of Future Generations (Wales) Act by applying the principles of sustainable development to the management of Wales' natural resources.

The Act puts the ecosystem approach into statute through a set of Sustainable Management of Natural Resources (SMNR) principles, which are based on the 12 principles (Ecosystem Approach principles) contained in the UN Convention on Biological Diversity (CBD).

The Environment Act enhances the former NERC Act duty to require all public authorities, when carrying out their functions in Wales, to seek to "maintain and enhance biodiversity" where it is within the proper exercise of their functions. In doing so, public authorities must also seek to "promote the resilience of ecosystems".

In relation to the requirements of this Act, the original Environmental Statement was informed by a number of ecological surveys, whilst further survey work was undertaken post planning submission and subsequently submitted for consideration as part of the ES Addendum. These surveys, which propose mitigation and enhancement measures where relevant, have been considered in detail by the Authority's Planning Ecologist who raises no objection to the proposed development subject to conditions. The further information received, and the Authority's Appropriate Assessment are currently being considered by NRW.

### **Welsh Government and Carmarthenshire County Council Strategies**

"Taking Wales Forward (2016-2021)" Sets out how the Welsh Government will deliver more and better jobs through a stronger, fairer economy, improve and reform its public services, and build a united, connected and sustainable Wales.

"Prosperity for All: The National Strategy" explains how, although Wales as a whole has grown strongly out of recession, there are areas of the country which have not seen the full benefits of growth. This has left some communities struggling to prosper and feeling isolated from other parts of Wales. Government has a key role in stimulating economic growth in areas of greatest need.

Creation of jobs and economic growth is a key focus of the Welsh Government. This is unsurprising with recent press releases advising that unemployment in Wales has risen to 5% (76,000 people), above the UK average of 4.3%.

This focus on job creation and economic development has cascaded down to Carmarthenshire County Council's strategic objectives. On the 9<sup>th</sup> September, 2015, the Authority adopted its 'Corporate Strategy 2015-2020', which details the Council's Strategic priorities and aspirations. The document is aligned with the 'Integrated Community Strategy for Carmarthenshire 2011-2016' and states that *'our vision is for a Carmarthenshire that enables people to live healthy and fulfilled lives by working together to build strong, bilingual and sustainable communities'*. The document goes on to outline what the Authority plans to do to achieve its vision for Carmarthenshire by identifying key priorities, one of which is to create a *'stronger and more prosperous economy'*.

The economic priority outlined in the Corporate Strategy is cascaded down through the economic development strategy launched for Carmarthenshire in November 2015 entitled 'A Strategic Regeneration Plan for Carmarthenshire 2015-2030 – Transformations'. This aims to create 5000 jobs in the County over the next 10 years, and the strategy focuses on 6 key development areas within the County, including Llanelli.

In the document titled 'Moving Forward – The Next 5 years' – the executive board of Carmarthenshire County Council has set 100 priority projects to deliver over the next 5 years with the delivery of the Llanelli Life Science and Wellness Village being one.

As aforementioned in this report, the area to the south of Llanelli town centre in which this proposed development is located, forms part of the Carmarthenshire Communities First Area, and along with adjacent wards record relatively high levels of multiple deprivation. The £200 million investment into the area, and the creation of between 1500 to 1800 jobs associated with the proposed LWLV is certainly welcomed and the LPA considers that the proposal strongly aligns with the above WG and CCC strategic objectives.

## **CONCLUSION**

The strategic importance of Llanelli, and especially the former heavily industrialised coastline of South Llanelli, is recognised at a national level in the Wales Spatial Plan, and locally in the Adopted LDP and accompanying SPG on South Llanelli.

The proposal will make a significant contribution towards realising the vision and strategic objectives of the LDP. The intention to deliver the development of Delta Lakes, which is a key component of a wider key strategic zone for the LDP, is duly welcomed in this regard.

Those relevant extracts from the LDP vision are as follows:

“CARMARTHENSHIRE 2021:

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 ...*”

It is encouraging to see the emphasis placed on respecting and maximising the outstanding environmental quality of the area within this application. Whilst the application is not akin to

a traditional B1/B2/B8 employment use, its potential contribution in terms of job creation and diversifying the overall employment sectoral base is readily apparent. As such, the application is reflective of policy GA2/MU9 in that the LDP seeks to set the framework for employment land use which reflects a multi sectoral emphasis. When taken alongside those well-established yet contrasting employment areas such as Bynea and Dafen, this site has potential to contribute to the delivery of a wider range and mix of the employment related offer across Llanelli and the wider City region.

The indicative masterplan submitted in support of this application identifies that the housing allocation to the east at The Avenue will accommodate some of the assisted living aspects of the overall scheme. In this regard, the application complies with the direction of travel provided by the LDP. Further assisted living is shown to the east of the site, but whilst no allowance is made within the mixed use allocation for the site in the LDP, the nature of this residential element is considered to be integral to the overall Wellness Village concept.

Whilst the northern extremity of the application site area (to the north of Afon Dafen) is located outside of the development limits of the LDP, it is noted that the uses proposed here demonstrate an acceptable compliance with the policy context, particularly its potential to augment and improve the overall open space/recreational offer.

It should also be noted that in seeking to facilitate the delivery of the Delta Lakes site in developmental terms, and indeed acknowledging its strategic contribution to the delivery of the Plan's strategy, the area's allocation within the LDP was also testimony to the potential localised regeneration benefits for the South Llanelli area. To this end, reference is made to the particular social, economic and environmental opportunities and challenges that are present within this area of Llanelli. It is considered important that wherever possible, those social/economic and spatial linkages are made with the local community so that the impact of this keynote project can be truly transformational for all. It is important that the ongoing developments within the area are connected to those established communities within Glan y Mor and the south of Llanelli. The site's development provides an opportunity to close the gap in urban form between recent developments at Machynys to the south and Morfa and the established urban form to the north in a permeable and legible manner. The development of this site offers considerable potential in this regard, as well as offering opportunities to improve linkages with those keynote transportation hubs, notably Llanelli Train Station.

In addition to the employment and health care provision focus of the development being fully compliant with the LDP aspirations for this strategic site, this report has also shown how the proposal complies with relevant legislation e.g. WFGA (2015) and aligns with strategic objectives of both Welsh Government and Carmarthenshire County Council.

The proposal represents one of the largest economic regeneration schemes in South West Wales, making efficient re-use of previously developed land and resulting in a development that will have significant health and wellbeing benefits. The proposal will not only provide a broad range of employment generating uses both during construction and when operational, a range of new community and education facilities will be provided.

The LDP allocation process would have considered the potential impact upon Welsh Language and Culture, but nevertheless there will be further opportunities to promote and enhance this as the scheme evolves through detailed design.

The application has been accompanied by a very detailed Environmental Statement and subsequent technical surveys and reports. These have been considered in depth by the LPA and relevant consultees, and it is noted that there is no objections from statutory consultees or any technical reason not to grant planning permission for the development proposed. There are no historic assets or environmental reasons that would preclude development taking place on the application site.

The application site is considered to be located in a highly accessible location on both a local and regional scale, whilst opportunities are available to enhance transport links further as part of detailed design.

As aforementioned clear opportunities present themselves to improve the recreational and ecological qualities of the site, and enhance links with the adjacent coastal path to the south. The new open space and recreational areas will provide positive benefits to the local community.

The masterplan drawing submitted with the application, whilst only being indicative at this stage, does serve to show how the site could potentially be developed in a comprehensive manner. It provides building frontages to public spaces and existing streets, optimising passive surveillance. The public buildings shown have the potential to spill-out onto outdoor spaces increasing levels of activity. Detailed consideration will be given at subsequent reserved matters stages to how building locations, heights and massing reflect and relate to the immediate context. The LPA does however consider that there is scope for the two main hub buildings to be quite significant in scale, with scale and massing reduced towards the urban fringes to the east and south.

It is considered that there are no loss of amenity issues associated with the proposed development, whilst it is considered that the issues of concern and objection raised have adequately been addressed as part of the above appraisal.

The project is intergenerational and has whole society provision at its heart, tackling many different aspects of social exclusion and health inequality. It has a central role to play in the sustainable, socioeconomic and physical regeneration of South Llanelli and beyond, creating a destination in its own right, but one that unites what has already been developed locally both physically and in terms of the existing employment, residential, tourism and leisure opportunities.

On balance after careful examination of the site and its surrounding environs in the context of this application, together with the representations received to date it is considered that the proposal does accord with the Policies contained within the Adopted LDP. As such the application is put forward with a recommendation for approval.

Members of the Planning Committee are respectfully asked to resolve to approve the application and grant the Head of Planning plenary powers to release the planning permission subject to Natural Resources Wales signing off the Appropriate Assessment.

## **RECOMMENDATION – APPROVAL**

### **CONDITIONS**

- 1 The permission now granted relates to the land defined by the 1:2500 scale location plan received on the 12<sup>th</sup> March, 2018.

- 2 Application for approval of reserved matters must be made to the local planning authority before the expiration of three years from the date of this permission, and the development must be commenced not later than whichever is the later of the following:-
- a) the expiration of five years from the date of this outline planning permission;
  - b) the expiration of two years from the date of approval of the last of the reserved matters to be approved.
- 3 Development shall not commence until detailed plans of the access; appearance; landscaping; layout; and scale of each building stated in the application, have been submitted, and received the written approval of the local planning authority.
- 4 The details to be submitted pursuant to Condition 2 above shall comply with the scale parameters set within both the description of development, and as shown on the Illustrative Masterplan and Building Dimensions 1:1250 @ A1 drawing received on the 12<sup>th</sup> March, 2018.
- 5 The development hereby approved shall be undertaken in accordance with the phasing plan drawing 1:2500 @ A3 received on the 30<sup>th</sup> October, 2018.
- 6 No development shall commence on each respective phase until a qualified and competent archaeologist has submitted a written scheme of investigation (WSI) for approval in writing by the local planning authority. This WSI will describe the different stages of the work and demonstrate that it has been fully resourced and given adequate time. On behalf of the local planning authority, their archaeological advisors (DAT DM) will monitor all aspects of this work through to the final discharging of the condition. This work will not be deemed complete until all aspects of the WSI have been addressed and the final report submitted and approved.
- 7 Prior to the commencement of development on each respective phase and in accordance with the recommendations made in the Geotechnical and Geo-Environmental Desk Study undertaken by Arup on the 8<sup>th</sup> November, 2016 and received by the local planning authority on the 12<sup>th</sup> March, 2018, the following need to be submitted for the written approval of the local planning authority:-
- The submission of a scheme of intrusive site investigations for both the mine entries and the shallow workings;
  - The undertaking of that scheme of intrusive site investigations;
  - The submission of a report of findings arising from the intrusive site investigations;
  - The submission of a scheme of remedial works for approval.
- Any remedial works required will need to be undertaken in strict accordance with the approved scheme.
- 8 Prior to the commencement of development on each respective phase approved by this planning permission, the following components of a scheme to deal with the risks



associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

- (i) A preliminary risk assessment which has identified:
  - all previous uses;
  - potential contaminants associated with those uses;
  - a conceptual model of the site indicating sources, pathways and receptors;
  - potentially unacceptable risks arising from contamination at the site.
- (ii) A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
- (iii) The site investigation results and the detailed risk assessment (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
- (iv) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

- 9 Prior to occupation of any part of the respective phase of the development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a “long-term monitoring and maintenance plan”) for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, and for the reporting of this to the local planning authority.
- 10 Reports on monitoring, maintenance and any contingency action carried out in accordance with a long-term monitoring and maintenance plan shall be submitted to the local planning authority as set out in that plan. On completion of the monitoring program a final report demonstrating that all long- term site remediation criteria have been met and documenting the decision to cease monitoring shall be submitted to and approved in writing by the local planning authority.
- 11 If, during development, contamination not previously identified is found to be present at the site then no further development shall be carried out until the developer has submitted and obtained written approval from the local planning authority for, an amendment to the remediation strategy detailing how this unsuspected contamination shall be dealt with.
- 12 No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the local planning authority, which may be given for

those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

- 13 Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater.
- 14 All roof downpipes must be sealed to reduce the risk of any polluting substances entering controlled waters.
- 15 During the demolition and construction phases, no works or demolition or construction shall take place other than within the hours of 07:30 – 18:00 Monday – Friday, Saturday 08:00 – 14:00 and not at all on Sundays, Bank or Public Holidays. As the proposed developments are situated in a primarily residential area, it is recommended to minimise noise disturbance that the construction work be undertaken in compliance with BS: 5228 Noise Vibration and Control on Construction and Open Sites.
- 16 The proposed residential dwellings shall be designed so as not to exceed the noise criteria based on current figures by BS8233 conditions given below:
  - Dwellings indoors in daytime: 35 dB LAeq,16 hours;
  - Outdoor living area in day time: 55 dB LAeq,16 hours;
  - Inside bedrooms at night-time: 30 dB LAeq,8 hours (45 dB LAmax);
  - Outside bedrooms at night-time: 45 dB LAeq,8 hours (60 dB LAmax).

Such detail and appropriate consequential noise mitigation measures shall have been agreed, in writing, by the local planning authority prior to the commencement on relevant phases of the development and shall be implemented prior to occupation of the building on the site and shall be maintained as agreed thereafter.

- 17 The rating level of sound emitted from the proposed development as a whole/emitted from any fixed part or machinery associated with the development shall not exceed the existing background sound level. The rating sound levels shall be determined at the nearest noise sensitive premises or at another location that is deemed suitable by the authority. Measurements and assessments shall be made in accordance with BS 4142: 2014 Methods for Rating and Assessing Industrial and Commercial Sound and/or its subsequent amendments.
- 18 Following the receipt of a justifiable complaint, within 28 days from the receipt of written request from the local planning authority, the operator of the development shall, at its own expense, employ an independent consultant approved by the local planning authority to assess the level of sound immissions arising from the development to determine whether they exceed the sound levels specified in condition 17. The assessment shall be undertaken under the supervision of the local authority.
- 19 In the event that Condition 17 is exceeded then the submitted survey shall also include mitigation measures to ensure compliance with the sound level specified in condition 17. These measures will then be implemented forthwith.

- 20 Prior to the importation of any soil a copy of the certificate of analysis, details of the source of the topsoil and an interpretation of the analytical results by a suitably qualified individual shall be submitted to and approved in writing by the local planning authority.
- 21 The development shall be undertaken in strict accordance with the dust mitigation measures outlined in Section 7.10 of the Environmental Statement Main Report March 2018 (Mitigation and Enhancement, Mitigation of effects from Construction).
- 22 Prior to the use of any access road by vehicular traffic, visibility splays in compliance with Technical Advice Note 18 (Transport) page 44 shall be formed and thereafter retained in perpetuity, either side of the centre line of the access road in relation to the nearer edge of carriageway.
- 23 Prior to the commencement of development on each respective phase the written approval of the local planning authority shall be obtained for a scheme of parking and turning facilities within the curtilage of the site, and this shall be dedicated to serve the proposal. The approved scheme is to be fully implemented prior to any part of the phase being brought into use, and thereafter shall be retained, unobstructed, in perpetuity. In particular, no part of the parking or turning facilities is to be obstructed by non-motorised vehicles.
- 24 Prior to the commencement of development on each respective phase the written approval of the local planning authority should be obtained for a scheme detailing the provision and frequency of use of facilities for washing down the wheels of construction vehicles prior to entering the public highway. Thereafter the scheme shall be implemented in full and in accordance with the approved details.
- 25 Prior to the commencement of development on each respective phase a detailed Construction Traffic Management Plan should be submitted for the written approval of the local planning authority and thereafter shall be implemented in full and in accordance with the approved details.
- 26 Prior to the commencement of development on each respective phase a detailed Travel Plan and Signing Strategy, setting out ways of reducing car usage, increasing walking and cycling and directing traffic to and from the development, shall be submitted to and agreed in writing by the local planning authority. The detailed Travel Plans shall be implemented and monitored on a yearly basis in accordance with the approved details at a timescale to be approved in writing by the local planning authority.
- 27 Prior to the beneficial occupation of each respective phase of the development, a Travel Plan Coordinator must be assigned to supervise the Travel Plan in perpetuity.
- 28 Prior to the commencement of development on Phase 3 an offsite Highways Mitigation Plan in relation to Trostre Roundabout and Halfway Traffic Signals shall be submitted to and approved in writing by the local planning authority. The approved works shall subsequently be implemented in full prior to the beneficial occupation of Phase 3.
- 29 Prior to beneficial occupation of any part of Phases 1 & 2 of the development herewith approved, provision of a public bus service to serve the site together with necessary

bus stop infrastructure shall be submitted for the written approval of the local planning authority. Thereafter the approved detail should be implemented and made available prior to the beneficial use of any of these phases.

- 30 Prior to beneficial occupation of any part of Phases 1 & 2 of the development herewith approved, the Walking and Cycling elements of the overall transport strategy for the site including crossing points along the B4304 Coastal Link Road and The Avenue shall be submitted for the written approval of the local planning authority. Thereafter the approved detail should be implemented and made available prior to the beneficial use of any of these phases.
- 31 No development shall commence on each respective phase, including site clearance, until a phase Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The CEMP should include:
- Construction methods: details of materials used in construction; details of how waste generated will be managed.
  - General Site Management: details of the construction programme including timetable, details of site clearance; details of site construction drainage site set-up plan detailing how sensitive receptors will be protected from harm e.g. fencing, containments areas, appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.
  - Biodiversity Management during construction: details of habitat retention and protection; invasive species management; species and habitat protection, avoidance and mitigation measures (as detailed with the ES and in addition mitigation measures regarding disturbance to Cetti's warbler).
  - Soil Management: details of topsoil strip, storage and amelioration for re-use.
  - CEMP Masterplan: details of the extent and phasing of development; location of landscape and environmental resources; design proposals and objectives for integration and mitigation measures.
  - Control of Nuisances: details of restrictions to be applied during construction including timing, duration and frequency of works; details of measures to minimise noise and vibration from piling activities, for example acoustic barriers; details of dust control measures; measures to control light spill.
  - Resource Management: details of fuel and chemical site storage and containment; details of waste generation and its management; details of the consumption of water, wastewater and energy use.
  - Traffic Management: details of site deliveries access points, storage and use of plant on site, details of wheel wash facilities.

- Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan.
- Details of the persons and bodies responsible for activities set out in the CEMP and emergency contact details. For example, contract manager, site manager, contractors, visitors, site environmental advisor, landscape clerk and ecological clerk of works to ensure construction compliance with approved plans and environmental regulations.
- Any environmental management and mitigation requirements for the construction phase as referenced in the environmental statement and associated documents.

The CEMP shall be implemented as approved during the site preparation and construction phases of the development.

- 32 No development shall commence on each respective phase until an ecological clerk of works has been appointed in consultation with the relevant planning authority. The ecological clerk of works shall be a suitably qualified environmental professional and shall be retained throughout the duration of civil construction works on site to advise on minimising ecological effects of the construction activities.
- 33 No development shall commence on each respective phase until details of the surface water drainage system (including means of pollution control, management and maintenance) have been submitted to and approved by the relevant planning authority. The surface water drainage system shall be constructed in accordance with the approved details. No building shall be occupied on each respective phase until the sustainable drainage system for the appropriate phase of the development has been completed in accordance with the approved details. The sustainable drainage system shall be managed and maintained thereafter in accordance with the agreed management and maintenance plan.
- 34 Prior to the commencement of development on each respective phase, an external lighting scheme shall be submitted for the consideration and written approval of the local planning authority. The scheme shall take into account all of the lighting needs and mitigation requirements associated with the development during operational hours and shall be the minimum required to perform the relevant lighting task. It shall be specifically designed to minimise the risk of light spillage beyond the development site boundary and within ecologically sensitive areas. The scheme shall include:
- A report, prepared by a lighting engineer, setting out the technical details of the luminaires and columns, including their location, type, shape, dimensions and, expected luminance output and specifically explaining what design attributes have been chosen to minimise light pollution.
  - A plan illustrating illuminance levels across the development site and at the boundary of the site. The level of illuminance should be appropriate to the character of the surrounding area as a whole.
  - A statement which demonstrates how the lighting scheme will be viewed against the wider landscape and, where appropriate, the potential role of landscaping in minimising the day and night-time visual impact of the installation.

- An Environmental Lighting Impact Assessment against conservation requirements for protected species and designated landscapes.

Once approved in writing, the lighting scheme shall be implemented and thereafter operated in accordance with the approved details.

35 No phase of development, including site clearance, with the potential to impact on otter or water vole or wintering birds shall commence until a pre-construction otter and water vole survey and wintering bird surveys has been carried out for that respective phase of development, the scope of which must be agreed with NRW and the local planning authority. If the survey confirms the presence of otter or water vole or wintering bird features of Burry Inlet SPA and Ramsar site, the results of the survey together with proposed mitigation measures shall be submitted to and approved in writing by the local planning authority. The measures shall be carried out in accordance with the approved details.

36 No development shall commence on each respective phase until a Landscape Ecological Management Plan (LEMP) for the provision, management and maintenance of the landscape and ecological features for a specific phase of the development, has been submitted to and approved by the local planning authority. The LEMP shall include:

- Details of habitats, landscape, environmental and ecological features present or to be created at the site.
- Details of the desired conditions of features (present and to be created) at the site.
- Details of scheduling and timings of activities.
- Details of short and long-term management proposals, monitoring proposals and maintenance operations of new and existing landscape, environmental and ecological features at the site to deliver and maintain the desired landscape and ecological conditions and functions.
- Details of monitoring of landscape and ecological features and required post construction monitoring.
- Details of replacement measures should any landscape or environmental features die, be removed or become seriously damaged or diseased within the lifetime of the development.
- Details of management and maintenance responsibilities.
- Details of timescales, length of plan, the method to review and update plans (informed by monitoring) at specific intervals as agreed between interested parties.
- Mechanisms to be used for reporting.

- The LEMP must deliver all mitigation and enhancement requirements for the operational phase as referenced in the environmental statement and associated documents.

The LEMP shall be carried out in accordance with the approved details.

- 37 No development shall commence on Phase 1 of the development, including site clearance until a suitable buffer zone scheme to protect and enhance the New Dafen River sensitive receptors including the watercourse, water body, island, associated marginal habitats and associated protected species including otter and water vole has been approved in writing by local planning authority and NRW. The scheme must be informed by up to date species survey information in relation to otter and water vole, the scope of which must be agreed with NRW and the local planning authority. The scheme must then be implemented as approved throughout the construction and operation phase of the development.
- 38 Prior to the determination of any application(s) for reserved matters seeking approval of 'layout' or 'landscaping', no trees with trunk/stem diameter exceeding 100 mm, measured at a height of 1.5 metres above ground level, which are located within or on the site boundary shall be cut down, up-rooted, destroyed, topped, lopped or pruned without the prior written approval of the local planning authority. Following such approval all works are to be carried out in accordance with BS3998.
- 39 Any reserved matters application(s) in relation to this outline approval, shall include submission of a Landscape Constraint Plan (LCP) to approval by the local planning authority. The LCP shall define the following:-
- (a) Stem location, canopy spread and root protection area (RPA) of all trees and groups of trees within or on the application boundary, and outside the boundary with a canopy spread which overhangs the boundary;
  - (b) Outer extent of above ground growth or canopy spread; and RPA of all other landscape elements (hedgerows and continuous woodland/scrub/shrub areas) within or on the application boundary.

If the proposed development would result in potential impacts from: construction operations; changes in level; construction phase access; or installation of underground apparatus, within any RPAs defined within the LCP, the following shall also be submitted to approval: -

- (i) Tree survey and Categorisation Report for all trees, groups of trees and other landscape elements subject to potential impacts within the RPAs.
- (ii) Arboricultural Impact Assessment (AIA) which identifies the impacts of the proposed development on all trees, groups of trees and other landscape elements. The AIA shall clearly indicate which are to be retained; which are subject to potential impacts; and which are to be removed. The AIA shall provide appropriate mitigation proposals for all trees, groups of trees and other landscape elements which are to be removed.
- (iii) Arboricultural Method Statement (AMS) which provides details, as necessary, of specific design solutions to enable effective retention of any trees, groups

of trees and other landscape elements which are identified as subject to potential impacts within the AIA.

- (iv) Tree Protection Plan (TPP) which provides details of all protective measures, operations and construction exclusion zones for all trees, groups of trees and other landscape elements to be retained;

All information shall be in compliance with the recommendations of BS5837.

- 40 All site operations shall be undertaken in compliance with the approved landscape constraint and protection information, as submitted to discharge condition 39.

Any construction operations and/or access within the defined construction exclusion zone(s) (CEZ) shall be limited to those undertaken in compliance with the recommendations of BS5837.

CEZ(s) shall be fully implemented prior to the commencement of any works associated with the respective phase of development; and thereafter maintained in entirety, throughout the duration of all development works and until all equipment, machinery and surplus materials have been removed from the site.

Any existing landscape elements, identified for protection, or part thereof, which, within a period of five years after implementation are removed; die; become diseased; damaged or otherwise defective, to such extent that, in the opinion of the local planning authority, the function of the existing landscape elements in relation to this planning approval is no longer delivered, shall be replaced in the next planting season with replacement elements of similar size and specification and in such positions as may be agreed with the local planning authority, and thereafter likewise conditioned for a further period of five years.

- 41 Any reserved matters application(s) in relation to this outline approval, shall include an appropriate and comprehensive detailed Landscape Design Scheme (LDS), which delivers proposals which effectively integrate appropriate site specific landscape, ecological and biodiversity objectives and functions. The scheme shall be in compliance with relevant guidance as provided by the local planning authority and the principles of the landscape and ecological information submitted within the Environmental Statement and Design and Access Statement.

- 42 The approved Landscape Design Scheme (LDS), as submitted to discharge condition 41 shall be fully implemented in the first available planting and seeding seasons following commencement of that respective phase of the development.

Any new landscape elements constructed, planted or seeded; or existing landscape elements retained; in accordance with the approved LDS which, within a period of 5 years after implementation are removed; die; become diseased; damaged or otherwise defective, to such extent that, in the opinion of the local planning authority, the function of the landscape elements in relation to this planning approval is no longer delivered, shall be replaced in the next planting or seeding season with replacement elements of similar size and specification.

- 43 Any reserved matters application(s) in relation to this outline approval, shall include submission of appropriate and comprehensive Landscape Maintenance and



Management (LMM) information to approval by the local planning authority. The information shall include the following:-

- (i) Landscape Maintenance and Management Responsibility Plan which provides clear definition of LMM responsibility for all landscape areas within the application boundary specifically: -
  - Areas subject to transfer to future private residential ownership and management responsibility in terms of private amenity space for the sole benefit of the future owner.
  - Areas of the site proposed for adoption by the local authority.
  - Areas within the site boundary not included in the above.
- (ii) Landscape Maintenance and Management Scheme (LMMS) for all landscape areas within the application boundary which are not subject to private ownership as defined above, or to adoption by the local authority. The LMMS shall include: -
  - Plans, specifications and schedules to cover establishment and long term proposals for landscape maintenance and management.
  - Details of the management agent (body or organisation) responsible for implementation of the LMMS; and the legal and funding mechanism(s) with the identified management agent by which delivery of the LMMS will be secured.

All landscape maintenance and management operations shall be fully implemented as approved.

- 44 No buildings on the application site shall be occupied earlier than 31st March 2020, unless the upgrading of Northumberland Sewage Pumping Station, into which the development shall drain, has been completed and written confirmation of this has been issued to the local planning authority by Dwr Cymru Welsh Water.
- 45 No occupation of the respective phases of development shall be made until the necessary improvements to the public sewerage system as identified in the Hydraulic Modelling Assessment (Ref: 132-SW186) have been completed and confirmed in writing to the local planning authority. These improvements shall align with the following phased approach as detailed in the applicant's latest drainage strategy (October 2018):-
  - Phase 1 shall connect to Delta Lakes Sewage Pumping Station following the delivery of Hydraulic Modelling Assessment Option 4;
  - Phase 2 shall connect by gravity to new manhole MH1 which is upstream of manhole SS51980801;
  - Phase 3 & 4 shall be pumped to new manhole MH1 which is upstream of manhole SS51980801 via a new Sewage Pumping Station and rising main.

- 46 No surface water and/or land drainage shall be allowed to connect directly or indirectly with the public sewerage network.
- 47 The proposed development site is crossed by a 1600mm sewer outfall from Northumberland Sewage Pumping Station. A detailed scheme for its protection shall be submitted to and agreed in writing by the local planning authority in consultation with Dwr Cymru/Welsh Water prior to works commencing on the relevant phase of development.
- 48 No buildings on the application site shall be occupied until a point of connection on the water supply system has been identified by a hydraulic modelling assessment, which shall be first submitted to and approved by the local planning authority. Thereafter the connection shall be made in accordance with the recommended connection option following the implementation of any necessary reinforcement works to the water supply system, as may be identified by the hydraulic modelling assessment.

## **REASONS**

- 1 In the interest of visual amenity.
- 2 Required to be imposed pursuant to Section 91 of the Town and Country Planning Act 1990.
- 3 In order to ensure a satisfactory layout of the site and in the interest of visual amenities.
- 4 To ensure that the details submitted do not exceed the scale of development assessed when granting outline planning permission
- 5 In order to ensure a satisfactory form of development.
- 6 To protect historic environment interests whilst enabling development.
- 7 To investigate any coal mining legacy features and to ensure safety and stability.
- 8 To prevent contamination of controlled waters.
- 9 To demonstrate that the remediation criteria relating to controlled waters have been met, and (if necessary) to secure longer-term monitoring of groundwater quality. This will ensure that there are no longer remaining unacceptable risks to controlled waters following remediation of the site.
- 10 To ensure that longer term remediation criteria relating to controlled waters have been met. This will ensure that there are no longer remaining unacceptable risks to controlled waters following remediation of the site.
- 11 Given the size/complexity of the site it is considered possible that there may be unidentified areas of contamination at the site that could pose a risk to controlled waters if they are not remediated.

- 12 There is an increased potential for pollution from inappropriately located infiltration systems such as soakaways, unsealed porous pavement systems or infiltration basins.
- 13 There is an increased potential for pollution of controlled waters from inappropriate methods of piling.
- 14 To prevent pollution of controlled waters.
- 15 To preserve residential amenity.
- 16-19 To preserve residential amenity.
- 20-21 To protect human health.
- 22-28 In the interest of highway safety.
- 29-30 In the interest of sustainable travel.
- 31 Prevent pollution of controlled waters and the wider environment and in the interest of biodiversity.
- 32 In the interest of biodiversity.
- 33 To ensure a satisfactory means of surface water drainage.
- 34 To minimise disturbance to protected species and minimise light pollution.
- 35 To minimise disturbance to protected species.
- 36 In the interest of biodiversity and visual amenity.
- 37 In the interest of biodiversity.
- 38-40 To ensure that the development retains, incorporates and does not adversely affect existing landscape or other features which contribute to local qualities and distinctiveness: thus delivering the objectives of CLDP policies: - SP1 d) and i); SP14 e); GP1 b) and f); and EQ5; and pursuant to section 197 (a) of the Town and Country Planning Act 1990.
- 41-42 To ensure that the development enhances the character and appearance of the site and ensures the use of good quality hard and soft landscaping and embraces opportunities to enhance biodiversity and ecological connectivity: thus delivering the objectives of CLDP policies: - SP1 d) and i); GP1 a), f) and i); EQ5; and where appropriate EQ6.
- 43 To ensure the long term delivery of the approved development proposals which enhance the character and appearance of the site; ensure the use of good quality hard and soft landscaping and embrace opportunities to enhance biodiversity and ecological connectivity: thus ensuring long term delivery of the objectives of CLDP policies: - SP1 d) and i); GP1 a), f) and i); EQ5; and where appropriate EQ6.

- 44-46 To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment.
- 47 To protect the integrity of the public sewer and avoid damage thereto, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment.
- 48 To prevent hydraulic overloading of the water supply system, to and ensure no detriment to existing residents and the environment.

## **REASONS FOR GRANTING PLANNING PERMISSION**

The decision to grant planning permission has been taken in accordance with Section 38 of the Planning and Compulsory Purchase Act 2004, which requires that, in determining a planning application the determination must be in accordance with the Development Plan unless material considerations indicate otherwise.

- It is considered that the proposal complies with Policy SP1 of the LDP in that the proposed development is environmentally sustainable
- It is considered that the proposal complies with Policy SP2 of the LDP in that the proposed development is resilient to the impact of climate change and accords with the provisions of TAN15
- It is considered that the proposal complies with Policy SP3 of the LDP in that the proposed development accords with the LDP's settlement framework
- It is considered that the proposal complies with Policy SP4 of the LDP in that it will ensure that a strategic site is developed in an appropriate manner thus contributing to the implementation of the LDP strategy
- It is considered that the proposal complies with Policy SP5 of the LDP in that it involves the development of a housing allocation in an appropriate manner
- It is considered that the proposal complies with Policy SP7 of the LDP in that it will ensure that an employment allocation is developed in an appropriate manner
- It is considered that the proposal complies with Policy SP9 of the LDP in that the proposed development is located in a sustainable location, accessible by a variety of transport means
- It is considered that the proposal complies with Policy SP11 of the LDP in that there is scope to incorporate energy efficiency measures and renewable energy production technologies within the scheme
- It is considered that the proposal complies with Policy SP13 of the LDP in that the proposed development respects, and will not adversely affect the built and historic environment or its setting
- It is considered that the proposal complies with Policy SP14 of the LDP in that proposed development protects and does not adversely affect the natural environment

- It is considered that the proposal complies with Policy SP15 of the LDP in that the tourism element of the proposed development accords with the locational hierarchy and is acceptable in terms of scale and type of development
- It is considered that the proposal complies with Policy SP16 of the LDP in that the proposal will involve the provision of new community facilities
- It is considered that the proposal complies with Policy SP17 of the LDP in that the proposed development will be served by appropriate infrastructure
- It is considered that the proposal complies with Policy SP18 of the LDP in that the interests of the Welsh language will be safeguarded and promoted
- It is considered that the proposal complies with Policy H1 of the LDP in that it involves the development of a housing allocation in an appropriate manner
- It is considered that the proposal complies with Policy EMP2 of the LDP in that the proposal will result in a new significant employment generator on a site identified for employment uses
- It is considered that the proposal complies with Policy EMP5 of the LDP in that it involves developing the Delta Lakes mixed use allocated site in an appropriate manner
- It is considered that the proposal complies with Policy GP1 of the LDP in that the proposed development is sustainable and will enhance the character and appearance of the area
- It is considered that the proposal complies with Policy GP2 of the LDP in that the majority of the site is located within the defined settlement limits of the growth area of Llanelli
- It is considered that the proposal complies with Policy GP3 of the LDP in that the application will be subject to a Planning Obligation to meet the requirements arising from the development
- It is considered that the proposal complies with Policy GP4 of the LDP in that adequate infrastructure is proposed to serve the proposed development
- It is considered that the proposal complies with Policy TR1 of the LDP in that the proposal does not restrict traffic movement or compromise safety of the primary road network
- It is considered that the proposal complies with Policy TR2 of the LDP in that the proposed development is located in a highly accessible and sustainable location
- It is considered that the proposal complies with Policy TR3 of the LDP in that the proposed development would not be detrimental to highway safety or cause significant harm to the amenity of residents
- It is considered that the proposal complies with Policy EQ1 of the LDP in that the proposed development preserves the built and historic environment

- It is considered that the proposal complies with Policy EQ4 of the LDP in that the proposed development will not have an adverse impact on priority species, habitats and features of principal importance
- It is considered that the proposal complies with Policy EQ5 of the LDP in that the proposal does not adversely affect ecological corridors, networks and features of distinctiveness
- It is considered that the proposal complies with Policy EP1 of the LDP in that the proposed development will not lead to a deterioration of either the water environment and/or the quality of controlled waters
- It is considered that the proposal complies with Policy EP2 of the LDP in that the proposed development will not result in any adverse pollution issues
- It is considered that the proposal complies with Policy EP3 of the LDP in that the impact of surface water drainage and the effectiveness of incorporating SUDS has been fully investigated
- It is considered that the proposal complies with Policy EP5 of the LDP in that the proposed development in this coastal location will not increase the risk of erosion, flooding or land instability
- It is considered that the proposal complies with Policy EP6 of the LDP in that there are no land instability issues
- It is considered that the proposal complies with Policy REC1 of the LDP in that the proposal will protect and enhance open space provision

## NOTES

- 1 Please note that this consent is specific to the plans and particulars approved as part of the application. Any departure from the approved plans will constitute unauthorised development and may be liable to enforcement action. You (or any subsequent developer) should advise the Council of any actual or proposed variations from the approved plans immediately so that you can be advised how to best resolve the matter.

In addition, any Conditions which the Council has imposed on this consent will be listed above and should be read carefully. It is your (or any subsequent developers') responsibility to ensure that the terms of all Conditions are met in full at the appropriate time (as outlined in the specific condition).

The commencement of development without firstly meeting in full the terms of any Conditions which require the submission of details prior to the commencement of development will constitute unauthorised development. This will necessitate the submission of a further application to retain the unauthorised development and may render you liable to formal enforcement action.

Failure on the part of the developer to observe the requirements of any other Conditions could result in the Council pursuing formal enforcement action in the form of a Breach of Condition Notice.

- 2 Comments and guidance received from consultees relating to this application, including any other permissions or consents required, is available on the Authority's website ([www.carmarthenshire.gov.uk](http://www.carmarthenshire.gov.uk)).
- 3 The planning permission hereby granted has been subject to a commuted sum financial contribution of £40,000 towards highway improvements at Sandy Roundabout, and £47,000 towards providing an Active Travel link between Copperhouse Roundabout and the junction with Northumbria Road.

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